

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EAST ST. LOUIS BRANCH NAACP, *et al.*,

Plaintiffs,

v.

ILLINOIS STATE
BOARD OF ELECTIONS, *et al.*,

Defendants.

Civil Action No. 1:21-cv-05512

**Circuit Judge Michael B. Brennan
Chief District Judge Jon E. DeGuilio
District Judge Robert M. Dow, Jr.**

**Three-Judge Court
Pursuant to 28 U.S.C. § 2284(a)**

**DECLARATION OF ELIZABETH M. WRIGHT IN SUPPORT OF
PLAINTIFFS' BRIEF IN COMPLIANCE WITH COURT ORDER
DIRECTING PARTIES TO RESPOND TO DEFENDANTS' REMEDIAL HOUSE
LEGISLATIVE MAP AND IN SUPPORT OF PLAINTIFFS' REMEDIAL MAPS**

I, Elizabeth M. Wright, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney at the law firm of Cooley LLP, counsel for Plaintiffs East St. Louis Branch of the NAACP, Illinois State Conference of the NAACP, and United Congress of Community and Religious Organizations in the above captioned action. I am admitted *pro hac vice* to practice before this Court in this matter. I am familiar with the proceedings in this case. I make the following statements based on personal knowledge of the facts and circumstances set forth herein.

2. I respectfully submit this declaration in support of Plaintiffs' Brief in Compliance with Court Order Directing Parties to Respond to Defendants' Remedial House Legislative Map and in Support of Plaintiffs' Remedial Maps and to transmit true and correct copies of the following documents:

Exhibit	Document
1.	Transcript of Illinois Senate and House of Representatives Redistricting Subcommittee hearing, dated April 19, 2021
2.	Excerpts of the transcript of the Joint Committee Redistricting Hearing, dated May 25, 2021 (Bates DemDefs-00001931)
3.	Excerpts of the deposition transcript of Jonathan Maxson, dated November 3, 2021
4.	Excerpts of the deposition transcript of Joseph Sodowski, dated November 4, 2021
5.	Illinois House Resolution 385
6.	Illinois Legislative Redistricting Summary (Bates DemDefs-00001116)
7.	House Plan v2 Data (Bates DemDefs-00001118)
8.	Illinois State House and Senate, 2021 Minority Members (Bates DemDefs-00001123)
9.	Email from Allan Lichtman, dated June 27, 2021 (Bates DemDefs-00001129)
10.	Email from Jessica Basham, dated March 12, 2021 (Bates DemDefs-00001358)
11.	Email from Michael Kasper, dated March 5, 2021 (Bates DemDefs-00001555)
12.	Email from Giovanni Randazzo, dated March 12, 2021 (Bates DemDefs-00001560)
13.	Email from Justin Cox, dated April 8, 2021 (Bates DemDefs-00001590)
14.	Email from Justin Cox, dated April 9, 2021 (Bates DemDefs-00001594)
15.	Email from Giovanni Randazzo, dated May 12, 2021 (Bates DemDefs-00001627)
16.	Undated Zoom Meeting invitation from Giovanni Randazzo (Bates DemDefs-00001636)
17.	2021 Reconfigured Districts spreadsheet (Bates DemDefs-00001902)
18.	Summary table containing select election results for HD 112 and HD 113

3. Exhibit 1 is a true and correct copy of the transcript of the Illinois Senate and House of Representatives Redistricting Committee hearing, dated April 19, 2021.

4. Exhibit 2 is a true and correct copy of excerpts from the transcript of the Joint Committee Redistricting hearing, dated May 25, 2021, which was produced by Defendants at Bates DemDefs-00001931.

5. Exhibit 3 is a true and correct copy of excerpts of the deposition transcript of Jonathan Maxson, dated November 3, 2021.

6. Exhibit 4 is a true and correct copy of excerpts of the deposition transcript of Joseph Sadowski, dated November 4, 2021.

7. Exhibit 5 is a true and correct copy of Illinois House Resolution 385, which was downloaded from the Illinois General Assembly website on November 10, 2021 at <https://www.ilga.gov/legislation/97/HR/PDF/09700HR0385lv.pdf>.

8. Exhibit 6 is a true and correct copy of an Illinois Legislative Redistricting Summary, which was produced by Defendants at Bates number DemDefs-00001116 to DemDefs-00001117.

9. Exhibit 7 is a true and correct copy of a House Plan v2 Data spreadsheet, which was produced by Defendants at Bates number DemDefs-00001118 to DemDefs-00001121.

10. Exhibit 8 is a true and correct copy of an Illinois State House and Senate, 2021 Minority Members, which was produced by Defendants at Bates number DemDefs-00001123 to DemDefs-00001124.

11. Exhibit 9 is a true and correct copy of an email chain from Allan Lichtman to Giovanni Randazzo and Michael Kasper, dated June 27, 2021, which was produced by Defendants at Bates number DemDefs-00001129.

12. Exhibit 10 is a true and correct copy of an email chain from Jessica Basham to Jessica Basham and BCC recipients, which was produced by Defendants at Bates number DemDefs-00001358 to DemDefs-000013570.

13. Exhibit 11 is a true and correct copy of an email chain from Michael Kasper to Justin Cox and Giovanni Randazzo, dated March 5, 2021, which was produced by Defendants at Bates number DemDefs-00001555 to DemDefs-00001559.

14. Exhibit 12 is a true and correct copy of an email chain from Giovanni Randazzo to Allan Lichtman, dated March 12, 2021, which was produced by Defendants at Bates number DemDefs-00001560 to DemDefs-00001584.

15. Exhibit 13 is a true and correct copy of an email chain from Justin Cox to Allan Lichtman, dated April 8, 2021, which was produced by Defendants at Bates number DemDefs-00001590 to DemDefs-00001592.

16. Exhibit 14 is a true and correct copy of an email chain from Justin Cox to Allan Lichtman, dated April 9, 2021, which was produced by Defendants at Bates number DemDefs-00001594 to DemDefs-00001678.

17. Exhibit 15 is a true and correct copy of an email chain from Giovanni Randazzo to Allan Lichtman, dated May 12, 2021, which was produced by Defendants at Bates number DemDefs-00001627.

18. Exhibit 16 is a true and correct copy of an email chain from Giovanni Randazzo to Justin Cox Allan Lichtman; and Michael Kasper, dated May 13, 2021, which was produced by Defendants at Bates number DemDefs-00001636 to DemDefs-00001641.

19. Exhibit 17 is a true and correct copy of a 2021 Reconfigured Districts spreadsheet, which was produced by Defendants at Bates number DemDefs-00001902 to DemDefs-00001904.

20. Exhibit 18 is a true and correct copy of election results from 2012 to 2020 for the House legislative races in HD 112 and HD 113. These results were obtained from searching the

Illinois State Board of Elections website, which provides searchable and downloadable election results, at <https://www.elections.il.gov/electionoperations/votetotalsearch.aspx>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 10, 2021, in Boston, Massachusetts.

/s/ Elizabeth M. Wright
Elizabeth M. Wright