STATE 2b

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON., *et al.* Plaintiffs, v. KYLE ARDOIN, IN HIS OFFICIAL CAPACITY AS LOUISIANA SECRETARY OF STATE, *et al* Defendant and Intervenor-Defendants,	Case No.: 3:22-cv-00211-SDD-SDJ
AND	(c/w)
EDWARD GALMON, SR., *et al.* Plaintiffs, v. KYLE ARDOIN, IN HIS OFFICIAL CAPACITY AS LOUISIANA SECRETARY OF STATE, *et al.* Defendant and Intervenor-Defendants.	Case No.: 3:22-cv-00214-SDD-SDJ

NOTICE OF CORRECTED DATA

Intervenor-Defendant the State of Louisiana (the "State") by and through Jeff Landry, Attorney General, respectfully filed this Notice of Corrected Data and states as follow:

1. On May 5, 2022, the State's demographic expert, Thomas M. Bryan prepared a Supplemental Expert Report where he assessed Mr. William Cooper's new Illustrative 4 Plan that was first presented to him in Mr. Cooper's rebuttal report. In

Mr. Bryan's assessment, he performed a detailed measurement of multi-race population associated the new Illustrative Plan 4.

2. As part of this supplemental assessment, Mr. Bryan provided an Appendix 2, which provided an analysis of the place splits in Illustrative Plan 4. Mr. Bryan provided similar documents as appendixes to his original report where he reviewed the place splits in Plaintiffs' other illustrative plans.

3. Following the submission of his supplemental report, Mr. Bryan discovered a small computation error that had no effect on his final determinations that arose from his analysis contained in Appendix 2.

4. In his May 5, 2022 submitted supplemental report, the Black values were divided by the total population in each row, rather than being divided by the share of Black (which adds to 100%). While not necessarily an error, this computation was inconsistent with how Mr. Bryan calculated percentages in his original report (divided by share of Black). As such, Mr. Bryan has provided a consistent computation for Appendix 2 of his supplemental report (replacing page 17 of that report), which is attached hereto as Exhibit A.

5. There are no other known computation errors in Mr. Bryan's supplemental report.

6. A Declaration of Thomas M. Bryan is attached hereto as Exhibit B.

Dated: May 10, 2022

Respectfully Submitted,

Jeff Landry
Louisiana Attorney General

/s/Angelique Duhon Freel

Jason B. Torchinsky (DC 976033)*
Phillip M. Gordon (DC 1531277)*
Dallin B. Holt (VSB 97330)*
Holtzman Vogel Baran
Torchinsky & Josefiak, PLLC
15405 John Marshall Highway
Haymarket, VA 20169
(540) 341-8808 phone
(540) 341-8809 fax
jtorchinsky@holtzmanvogel.com
pgordon@holtzmanvogel.com
dholt@holtzmanvogel.com

*admitted *pro hac vice*
** admission *pro hac vice* forthcoming

Elizabeth B. Murrill (LSBA No. 20685)
Shae McPhee (LSBA No. 38565)
Morgan Brungard (CO Bar No. 50265)*
Angelique Duhon Freel (LSBA No. 28561)
Carey Tom Jones (LSBA No. 07474)
Jeffery M. Wale (LSBA No. 36070)
Office of the Attorney General
Louisiana Department of Justice
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6000 phone
(225) 326-6098 fax
murrille@ag.louisiana.gov
freela@ag.louisiana.gov
walej@ag.louisiana.gov
jonescar@ag.louisiana.gov
mcphees@ag.louisiana.gov
brungardm@ag.louisiana.gov

Counsel for Intervenor-Defendant the State of Louisiana

CERTIFICATE OF SERVICE

I CERTIFY I have served the foregoing was served on counsel for the parties via electronic means on May 10, 2022.

/s/Phillip M. Gordon
Phillip Gordon
Counsel for the State of Louisiana

EXHIBIT A

Appendix 2 Illustrative 4 Plan Place Splits Analysis

Place Name	District	Total	Total Percent	# Black	Black % (Original by Row)	Black % (Revised by Column)
Alexandria city	4	10,793	23.8%	1,939	18.0%	7.5%
	5	34,482	76.2%	23,792	69.0%	92.5%
Arnaudville town	1	39	3.9%	5	12.8%	3.8%
	5	970	96.1%	127	13.1%	96.2%
Ball town	4	31	0.8%	6	19.4%	1.1%
	5	3,930	99.2%	516	13.1%	98.9%
Baton Rouge city	5	143,479	63.1%	105,132	73.3%	83.4%
	6	83,991	36.9%	20,965	25.0%	16.6%
Broussard city	1	190	1.4%	25	13.2%	1.1%
	3	13,227	98.6%	2,323	17.6%	98.9%
Carencro city	3	29	0.3%	3	10.3%	0.1%
	5	9,243	99.7%	4,561	49.3%	99.9%
Eunice city	3	302	3.2%	31	10.3%	0.9%
	5	9,120	96.8%	3,487	38.2%	99.1%
Kenner city	1	56,858	85.6%	9,803	17.2%	62.0%
	2	9,590	14.4%	6,021	62.8%	38.0%
Lafayette city	3	82,561	68.0%	12,482	15.1%	31.7%
	5	38,813	32.0%	26,872	69.2%	68.3%
Mandeville city	1	0	0.0%	0	0.0%	0.0%
	6	13,192	100.0%	707	5.4%	100.0%
Morgan City city	1	0	0.0%	0	0.0%	0.0%
	3	11,472	100.0%	2,766	24.1%	100.0%
New Iberia city	1	25,204	88.3%	12,460	49.4%	93.8%
	3	3,351	11.7%	830	24.8%	6.2%
New Orleans city	1	33,047	8.6%	2,459	7.4%	1.1%
	2	350,950	91.4%	216,510	61.7%	98.9%
Pineville city	4	289	2.0%	48	16.6%	0.9%
	5	14,095	98.0%	5,085	36.1%	99.1%
West Monroe city	4	8,264	63.1%	1,737	21.0%	35.4%
	5	4,839	36.9%	3,164	65.4%	64.6%
Zachary city	5	19,303	99.9%	9,040	46.8%	100.0%
	6	13	0.1%	0	0.0%	0.0%

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON., *et al.* Plaintiffs, v. KYLE ARDOIN, IN HIS OFFICIAL CAPACITY AS LOUISIANA SECRETARY OF STATE, *et al* Defendant and Intervenor-Defendants,	Case No.: 3:22-cv-00211-SDD-SDJ
AND	(c/w)
EDWARD GALMON, SR., *et al.* Plaintiffs, v. KYLE ARDOIN, IN HIS OFFICIAL CAPACITY AS LOUISIANA SECRETARY OF STATE, *et al.* Defendant and Intervenor-Defendants.	Case No.: 3:22-cv-00214-SDD-SDJ

DECLARATION OF EXPERT THOMAS M. BRYAN

Comes Now Thomas M. Bryan, and states as follows:

1. I have been retained by the State of Louisiana in the above referenced matter to provide my expert opinion as to the demographic characteristics and impacts of the Louisiana Enrolled Plan and the Plaintiff's Illustrative Plans. I am over the age of 18 and of sound mind.

2. I make the statements below based on my personal knowledge, information, and belief.

3. On or about May 5, 2022, I prepared a Supplemental Expert Report where I assessed Mr. William Cooper's new Illustrative 4 Plan that was first presented to me in Mr. Cooper's rebuttal report. In my assessment, I performed a detailed measurement of multi-race population associated the new Illustrative Plan 4.

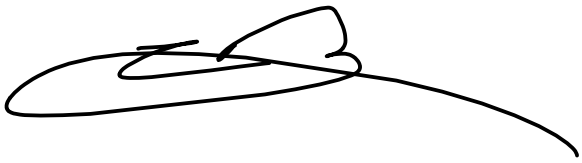
4. As part of this supplemental assessment, I provided an Appendix 2, which provided an analysis of the place splits in Illustrative Plan 4. I provided similar documents as appendixes to my original report where I reviewed the place splits in Plaintiffs' other illustrative plans.

5. As I reviewed this analysis following its submission, I discovered a small computation error that had no effect on my final determinations that arose from this analysis.

6. In my May 5, 2022 submitted supplemental report, the Black values were divided by the total population in each row, rather than being divided by the share of Black (which adds to 100%). While not necessarily an error, this computation was inconsistent with how I calculated percentages in my original report (divided by share of Black). As such, I have provided a consistent computation for Appendix 2 of my supplemental report which is attached hereto as Ex. 1.

7. There are no other computation errors I have identified in my supplemental report.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 10th day of May 2022.



By: Thomas M. Bryan