

**Errata to the Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated
November 20, 2025**

I am thankful to Dr. Barber for pointing out a problem with the underlying geographic boundary file used to conduct redistricting simulations in Eastern North Carolina in my Supplemental Rebuttal Report, dated November 18, 2025. In an effort to include the newest election results in my analysis, I created a new geographic boundary file for North Carolina VTDs. It did not include county identifiers, so I overlaid a geographic boundary file for counties and attempted to apply county identifiers to the VTDs. However, due to the representation of Albermarle Sound and the rivers, estuaries, and marshland in the county boundary file I used, some counties were given the wrong identifiers. This could indeed be a problem for conducting simulations, because as Dr. Barber pointed out, “the algorithm cannot minimize county divisions correctly.” It is possible that a handful of plans may have allowed unnatural configurations, although it should be noted that none of the plans produced non-contiguous districts.

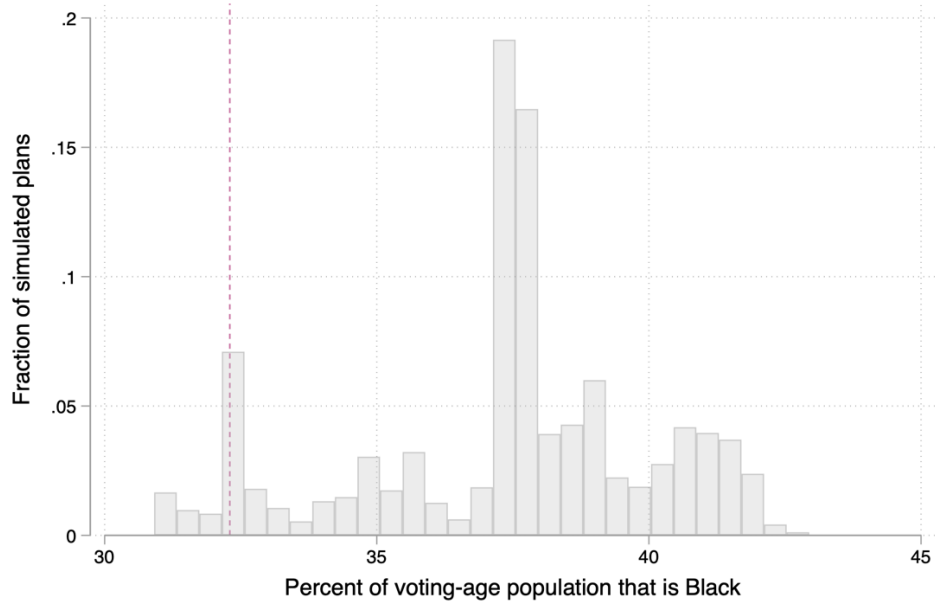
I have rectified this mistake by going back to exactly the VTD boundary files used by Dr. Barber in his original report, which includes correct county identifiers, and likewise, I use the same census and election data as Dr. Barber’s original report, with election results up to the 2022 General Election.

Dr. Barber also points out a much smaller problem. I used a population equality standard that was relatively strict. This had the impact of reducing the diversity of the plans. That is to say, it was possible to optimize the parameters of the algorithm so that it discovers a wider range of plans with only a single county split than in the original ensemble I produced. I have slightly tuned the parameters so that the “resample efficiency” described by Dr. Barber is now above 96 percent, and there are now no discernible bottlenecks.

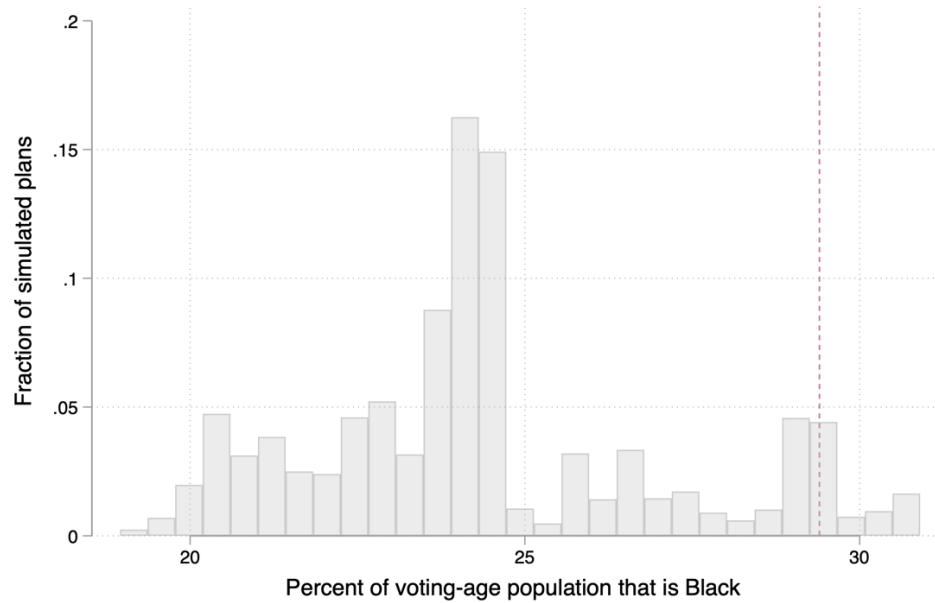
Using this new set of simulations, I reproduce the figures related to the simulations below. The inference drawn from these alternative simulations is the same as in my earlier report, although the numbers are slightly different. My previous report found that “a highest-ranked BVAP of 32.3 percent is indeed quite unusual in the ensemble of race-blind plans. Only around 4.9 percent of all plans have a similar or lower BVAP in their highest-ranked district.” ECF No. 206-4 at 12. In the new simulations, that number is 3.8 percent. In my previous report, I wrote that in the ensemble of simulated plans, “the BVAP is higher in the second-ranked district than in all but 4.3 percent of the plans.” *Id.* With the new simulations, this number is 4.1 percent.

I previously wrote that 1,429 simulated plans (around 29 percent of the ensemble) produced two Republican districts. *Id.* at 14. With the new simulations, the number is 1,002 (20 percent). I previously wrote that of those, 1,184 (around 83 percent) had a BVAP in the higher-ranked district greater than the 2025 Plan’s District 1’s BVAP of 32.3 percent. *Id.* That number is now 812 (81 percent). These are small differences, and they do not lead me to alter the conclusions in my earlier report.

Errata Figure 4a: Histograms of BVAP in Ensemble of Two-District Eastern North Carolina Plans, *Highest* BVAP District



Errata Figure 4b: Histograms of BVAP in Ensemble of Two-District Eastern North Carolina Plans, *Lowest* BVAP District



Executed on November 20, 2025

A handwritten signature in black ink, appearing to read 'Jonathan Rodden', written in a cursive style.

Jonathan Rodden