

**PARR BROWN GEE & LOVELESS**

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**IN THE THIRD JUDICIAL DISTRICT COURT  
 IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

LEAGUE OF WOMEN VOTERS OF  
 UTAH, MORMON WOMEN FOR  
 ETHICAL GOVERNMENT, STEFANIE  
 CONDIE, MALCOLM REID, VICTORIA  
 REID, WENDY MARTIN, ELEANOR  
 SUNDWALL, and JACK MARKMAN,

Plaintiffs,

v.

UTAH STATE LEGISLATURE et al.,

Defendants.

**PLAINTIFFS' NOTICE OF MAP  
 SUBMISSION**

Case No. 220901712

Honorable Dianna Gibson

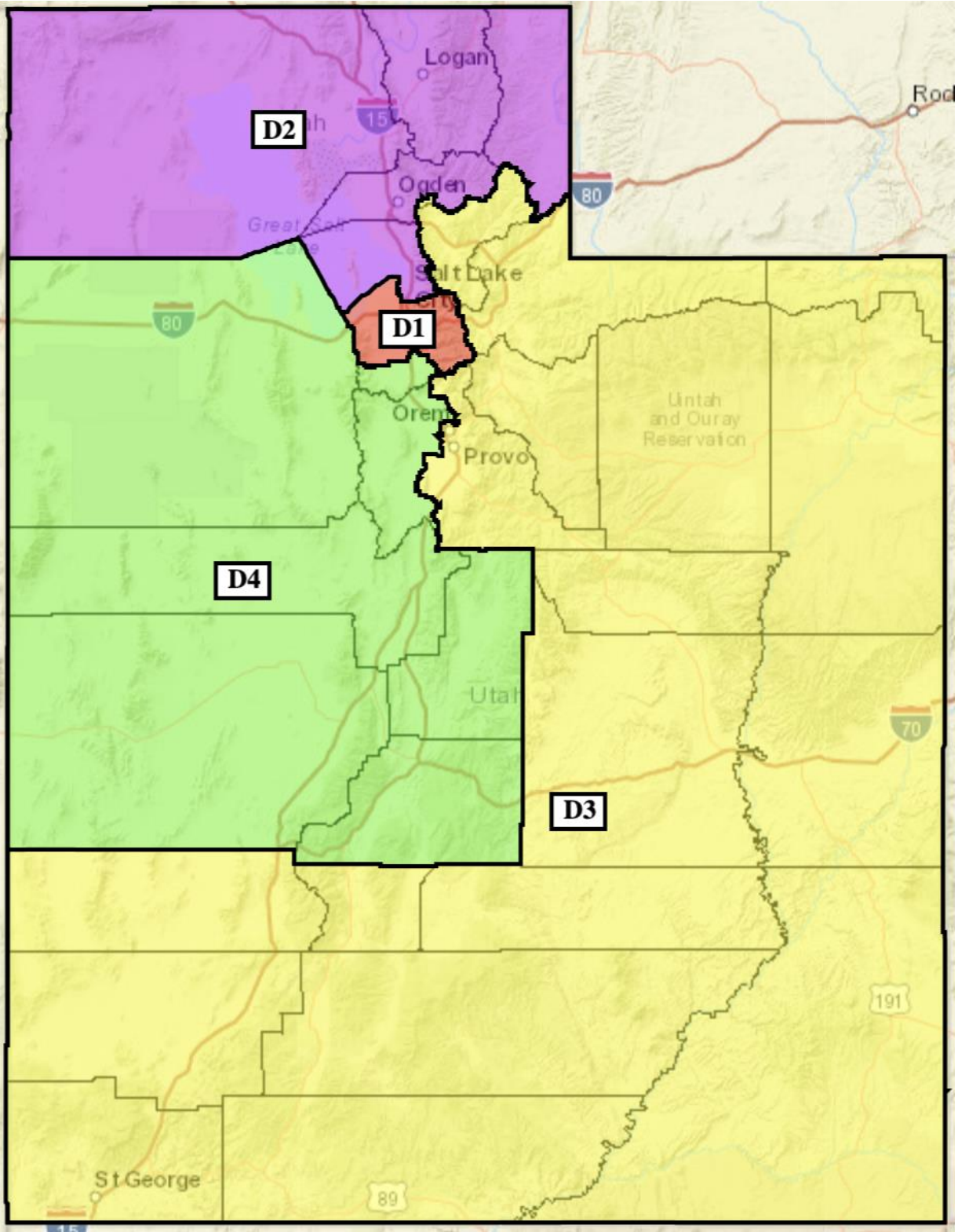
Pursuant to this Court’s September 6, 2025 Order adopting the parties’ stipulated remedial schedule, Plaintiffs respectfully submit two maps for consideration by the Court. These maps are submitted because the map enacted by the Legislature on October 6, 2025 fails to abide by and conform to Proposition 4’s requirements. Plaintiffs will submit their supporting brief and expert reports on October 17 per the scheduling order, but briefly describe the features of their proposed maps.

Plaintiffs’ **Map 1** is derived from an ensemble of 10,000 maps generated by a computer algorithm designed to comply with Proposition 4’s priority-ordered redistricting criteria in a partisan-blind manner. Map 1, which splits only one municipality, was selected because minimizing municipal splits is the highest priority criterion in Proposition 4 after population equality and compliance with federal law. Notably, Map 1 has substantial population overlap with the Commission’s Orange and Purple Maps, with an average of 84.6% population overlap with the Orange Map’s districts and 80.6% population overlap with the Purple Map’s districts.

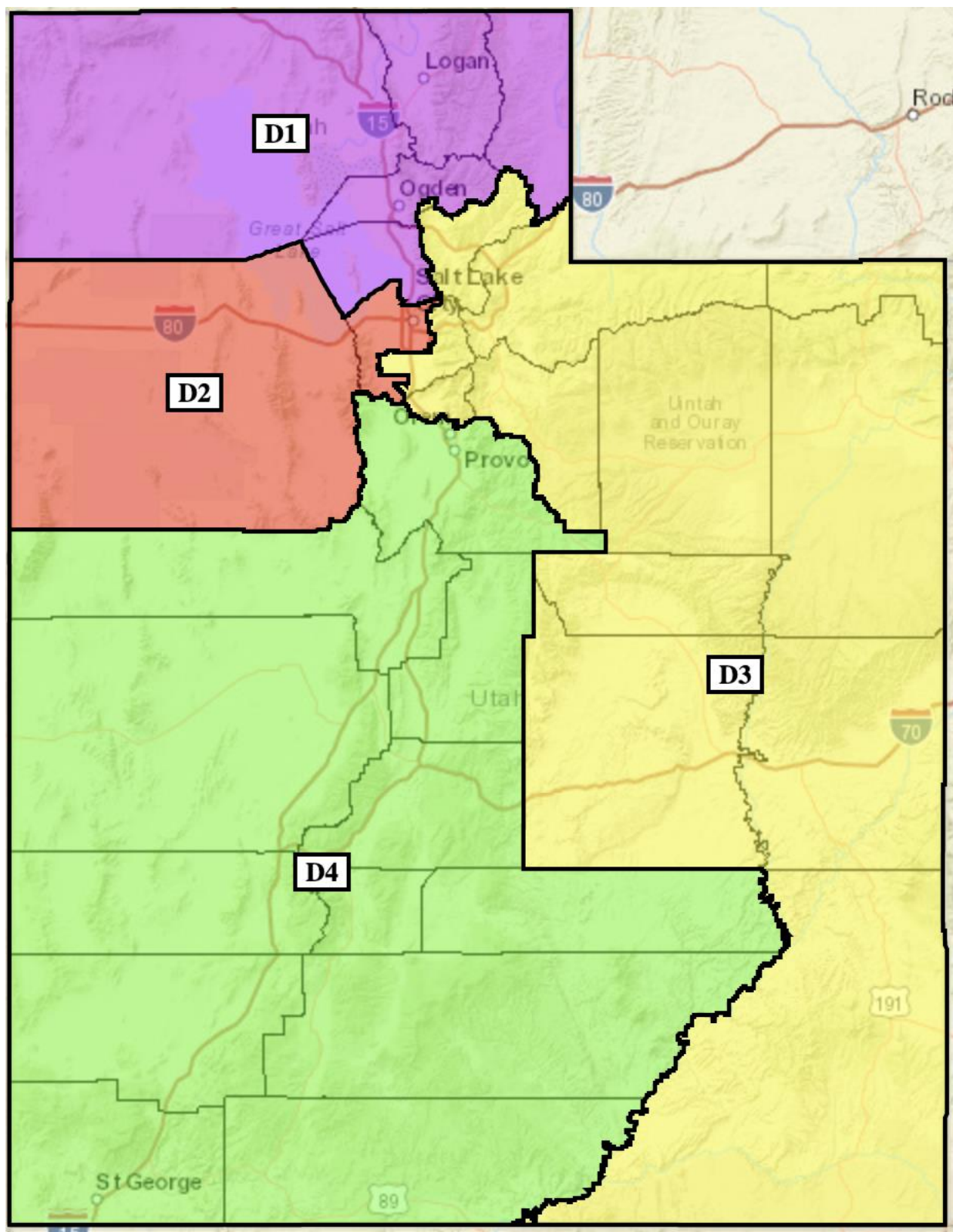
Plaintiffs’ **Map 2** is based on the Legislature’s adopted remedial map and is intended to be a “least change” map while also correcting the enacted map’s failure to abide by and conform to Proposition 4’s requirements. In particular, it corrects the enacted map’s failure to minimize municipal and county splits to the greatest extent practicable and the enacted map’s failure to comply with Proposition 4’s prohibition against purposefully or unduly favoring or disfavoring political parties. Map 2 has an average of 84.1% population overlap with the Legislature’s enacted map. Map 2 also has substantial population overlap with the Commission’s Purple (82.0%) and Orange (77.8%) maps.

Plaintiffs’ maps and corresponding geographic files can be accessed at: <https://campaignlegal.org/document/plaintiffs-map-submission>. Map images and summary comparison data are presented below.

PLAINTIFFS' MAP 1



## PLAINTIFFS' MAP 2



### Map Submission Comparison Chart

|                                              | <b>Plaintiffs’<br/>Map 1</b> | <b>Plaintiffs’<br/>Map 2</b> | <b>Legislature’s<br/>Map C</b>  |
|----------------------------------------------|------------------------------|------------------------------|---------------------------------|
| <b>Population Deviation</b>                  | 0                            | 0                            | 0                               |
| <b>Municipal Splits</b>                      | 1 municipality into 2 pieces | 1 municipality into 2 pieces | 3 municipalities into 11 pieces |
| <b>Municipal Splits (Pieces)</b>             |                              |                              |                                 |
| Midvale                                      | 2                            | 0                            | 0                               |
| Millcreek                                    | 0                            | 0                            | 6                               |
| North Salt Lake                              | 0                            | 0                            | 2                               |
| Pleasant Grove                               | 0                            | 2                            | 3                               |
| <b>County Splits</b>                         | 3 counties into 6 pieces     | 3 counties into 6 pieces     | 3 counties into 7 pieces        |
| <b>County Splits (Pieces)</b>                |                              |                              |                                 |
| Salt Lake                                    | 2                            | 2                            | 2                               |
| Utah                                         | 2                            | 2                            | 3                               |
| Weber                                        | 2                            | 2                            | 2                               |
| <b>Compactness<br/>(Reock/Polsby-Popper)</b> | Mean: .49/.44                | Mean: .49/.37                | Mean: .49/.40                   |
| District 1                                   | .53/.41                      | .45/.42                      | .45/.43                         |
| District 2                                   | .45/.42                      | .52/.43                      | .55/.52                         |
| District 3                                   | .44/.36                      | .36/.23                      | .36/.22                         |
| District 4                                   | .55/.56                      | .61/.41                      | .61/.41                         |
| <b>Boundary Agreement*</b>                   |                              |                              |                                 |
| State House                                  | 56                           | 54                           | 51                              |
| State Senate                                 | 13                           | 13                           | 12                              |
| State School Board                           | 3                            | 2                            | 3                               |
| <b>Map C Core Retention**</b>                | N/A                          | 84.1%                        | N/A                             |
| <b>UIRC Core Retention**</b>                 |                              |                              |                                 |
| <b>Orange</b>                                | 84.6%                        | 77.8%                        | 65.7%                           |
| <b>Purple</b>                                | 80.6%                        | 82.0%                        | 66.2%                           |

\* Boundary agreement with existing state legislative and school board boundaries is measured by the number of districts in those plans kept whole in the congressional map.

\*\*Core retention with the Legislature’s submission (Map C) and any Utah Independent Redistricting Commission maps is not a requirement of Proposition 4 and is provided for informational purposes only.

In addition to adhering to the Proposition 4 criteria noted in the chart above, Plaintiffs' Maps 1 and 2 are contiguous, preserve communities of interest, and follow natural and geographic boundaries as required by Proposition 4. Neither map purposefully nor unduly favors or disfavors any political party, as Plaintiffs will demonstrate in their forthcoming brief and expert reports.

RESPECTFULLY SUBMITTED this 6th day of October 2025.

/s/ David C. Reymann

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