

The Honorable Robert S. Lasnik
The Honorable David G. Estudillo
The Honorable Lawrence Van Dyke

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

BENANCIO GARCIA III.,

Plaintiff,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, and
STATE OF WASHINGTON,

Defendants.

NO. 3:22-cv-5152-RSL-DGE-LJCV

DECLARATION OF
ANDREW HUGHES IN SUPPORT
OF STATE OF WASHINGTON'S
RESPONSE TO PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT

NOTE FOR MOTION CALENDAR:
MARCH 31, 2023

ANDREW HUGHES, hereby declare the following:

1. I am an Assistant Attorney General with the Office of the Attorney General of Washington, representing Defendant State of Washington, in the above captioned matter. The following statement are based on my own personal knowledge and the records and files in this case.

2. Attached hereto as Exhibit A is a true and correct copy of the Partial Consent Decree entered in *Glatt v. City of Pasco*, No. 4:16-CV-05108-LRS, ECF No. 16 (E.D. Wash. Sep. 2, 2016).

3. Attached hereto as Exhibit B is a true and correct copy of the Memorandum Opinion and Order entered in *Glatt v. City of Pasco*, No. 4:16-CV-05108-LRS, ECF No. 40 (E.D. Wash. Jan. 27, 2017).

4. Attached hereto as Exhibit C is a true and correct copy of the Complaint filed in *Aguilar v. Yakima County*, No. 20-2-0018019 (Kittitas Cnty. Super. Ct.).

5. Attached hereto as Exhibit D is a true and correct copy of excerpts of the Declaration of Annabelle Harless in Support of Plaintiffs' Motion to Approve Settlement and Enter Final Judgment filed in *Aguilar v. Yakima County*, No. 20-2-0018019 (Kittitas Cnty. Super. Ct.).

6. Attached hereto as Exhibit E is a true and correct copy of the Order Approving Settlement and Entering Final Judgment entered in *Aguilar v. Yakima County*, No. 20-2-0018019 (Kittitas Cnty. Super. Ct. Oct. 29, 2021).

7. Attached hereto as Exhibit F is a true and correct copy of an email string between Ali O'Neil and Kenneth Fockele, which includes an October 21, 2021 press release sent on behalf of Brady Walkinshaw.

8. Attached hereto as Exhibit G is a true and correct copy of a September 24, 2021 email from Adam Hall to Brady Walkinshaw, among others.

9. Attached hereto as Exhibit H is a true and correct copy of a September 28, 2021 email from Dominique Meyers to April Sims, with an attachment.

10. Attached hereto as Exhibit I is a true and correct copy of a March 25, 2021 email string between Osta Davis and April Sims.

11. Attached hereto as Exhibit J is a true and correct copy of a January 2020 report from MGGG entitled *Analysis of county commission elections in Yakima County, WA*.

12. Attached hereto as Exhibit K is a true and correct copy of a report by Dr. Matt Barreto dated February 6, 2013.

1 13. Attached hereto as Exhibit L is a true and correct copy of an October 15, 2021
2 report by Dr. Matt Barreto entitled *Assessment of Voting Patterns in Central/Eastern*
3 *Washington and Review of Federal Voting Rights Act, Section 2 Issues*.

4 14. Attached hereto as Exhibit M is a true and correct copy of an October 25, 2021
5 press release sent on behalf of Brady Walkinshaw.

6 15. Attached hereto as Exhibit N is a true and correct copy of a November 13, 2021
7 email string between April Sims and Paul Graves, among others.

8 16. Attached hereto as Exhibit O is a true and correct copy of a November 11, 2021
9 email string between Paul Graves and April Sims, among others.

10 17. Attached hereto as Exhibit P is a true and correct copy of the Supreme Court of
11 Washington's Order Regarding the Washington State Redistricting Commission's Letter to the
12 Supreme Court on November 16, 2021 and the Commission Chair's November 21, 2021,
13 Declaration, Order No. 25700-B-676 (Dec. 3, 2021).

14 18. Attached hereto as Exhibit Q is a true and correct copy of the Sworn Declaration
15 of Sarah Augustine, Chair of the Washington State Redistricting Commission, filed in the
16 Washington Supreme Court in response to Order Regarding the Washington State Redistricting
17 Commission's Letter to the Supreme Court on November 16, 2021.

18 19. Attached hereto as Exhibit R is a true and correct copy of the expert report of
19 Dr. John Alford from *Soto Palmer v. Hobbs*, No. 22-cv-05035-RSL (W.D. Wash.).

20 20. Attached hereto as Exhibit S is a true and correct copy of Dr. Loren
21 Collingwood from *Soto Palmer v. Hobbs*.

22 21. Attached hereto as Exhibit T is a true and correct copy of Dr. Mark Owens from
23 *Soto Palmer v. Hobbs*.

24 22. Attached hereto as Exhibit U is a true and correct copy of a June 24, 2021 email
25 string between Joe Fain and Paul Campos.
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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 27th day of March, 2023 in Seattle, Washington.

4
5 s/ Andrew R.W. Hughes

6 ANDREW R.W. HUGHES, WSBA No. 49515
7 Assistant Attorney General
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DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 27th day of March, 2023 at Seattle, Washington

s/ Andrew R.W. Hughes

ANDREW R.W. HUGHES, WSBA No. 49515
Assistant Attorney General