

The Honorable Robert S. Lasnik

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

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, et al.,

Defendants.

JOSE TREVINO, et al.

Intervenor-Defendants.

NO. 3:22-cv-05035-RSL

DEFENDANT SECRETARY OF STATE
STEVEN HOBBS'S RESPONSE TO
PLAINTIFFS' BRIEF IN SUPPORT OF
REMEDIAL PROPOSALS

Secretary Hobbs takes no position on whether to adopt any of Plaintiffs' proposed remedial maps. Secretary Hobbs submits this brief for the purpose of providing information about the proposals and defers to the Court regarding whether and how the information should be utilized by the Court in selecting a remedial map. Specifically, this brief provides two pieces of information regarding each remedial map: (1) the counties affected; and (2) the districts in which incumbents would be displaced. This information was identified through an analysis performed by the Office of the Secretary of State. Decl. of Nick Pharris.

Plaintiffs' Remedial Proposal 1

Plaintiffs' first remedial proposal would affect 13 counties: Adams, Benton, Chelan, Clark, Douglas, Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.

Plaintiffs' first remedial proposal would displace 8 incumbents in the following positions, Pharris Decl., ¶ 7:

LD 8 Representative, Position 1

LD 12 Senator

LD 14 Representative, Position 1

LD 14 Representative, Position 2

LD 14 Senator

LD 15 Senator

LD 31 Representative, Position 1

LD 31 Senator

Plaintiffs' Remedial Proposal 2

Plaintiffs' second remedial proposal would affect 11 counties: Adams, Benton, Clark, Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.

Plaintiffs' second remedial proposal would displace 5 incumbents in the following positions, Pharris Decl., ¶ 8:

LD 8 Representative, Position 1

LD 14 Representative, Position 1

LD 14 Representative, Position 2

LD 14 Senator

LD 15 Senator

Plaintiffs' Remedial Proposal 3

Plaintiffs' third remedial proposal would affect 12 counties: Adams, Benton, Chelan, Clark, Douglas, Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.

Plaintiffs' third remedial proposal would displace 7 incumbents in the following positions, Pharris Decl., ¶ 9:

LD 8 Representative, Position 1

LD 12 Senator

LD 14 Representative, Position 1

LD 14 Representative, Position 2

LD 14 Senator

LD 15 Senator

LD 31 Senator

Plaintiffs' Remedial Proposal 4

Plaintiffs' fourth remedial proposal would affect 10 counties: Adams, Benton, Clark, Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.

Plaintiffs' fourth remedial proposal would displace 5 incumbents in the following positions, Pharris Decl., ¶ 10:

LD 8 Representative, Position 1

LD 14 Representative, Position 1

LD 14 Representative, Position 2

LD 14 Senator

LD 15 Senator

Plaintiffs' Remedial Proposal 5

Plaintiffs' fifth remedial proposal would affect 3 counties: Benton, Klickitat, and Yakima. Pharris Decl., ¶ 5.

Plaintiffs' fifth remedial proposal would displace 4 incumbents in the following positions, Pharris Decl., ¶ 11:

LD 14 Representative, Position 1

LD 14 Representative, Position 2

LD 15 Representative, Position 1

LD 15 Representative, Position 2

RESPECTFULLY SUBMITTED this 22nd day of December, 2023.

ROBERT W. FERGUSON
Attorney General

s/ Karl D. Smith
KARL D. SMITH, WSBA 41988
Deputy Solicitor General
KATE S. WORTHINGTON, WSBA 47556
Assistant Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200
Karl.Smith@atg.wa.gov
Kate.Worthington@atg.wa.gov

Attorneys for Defendant Steven Hobbs

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 22nd day of December 2023, at Olympia, Washington.

s/ Leena Vanderwood
Leena Vanderwood
Paralegal
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200
Leena.Vanderwood@atg.wa.gov