

The Honorable Robert S. Lasnik

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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

SUSAN SOTO PALMER, et al.,  
  
  Plaintiffs,  
  
  v.  
  
STEVEN HOBBS, in his official capacity  
as Secretary of State of Washington, and  
the STATE OF WASHINGTON,  
  
  Defendants,  
  
  and  
  
JOSE TREVINO, et al.,  
  
  Intervenor-Defendants.

NO. 3:22-cv-5035-RSL  
  
STATE OF WASHINGTON’S  
RESPONSE TO PLAINTIFFS’  
REMEDIAL PROPOSALS

Pursuant to this Court’s October 4, 2023 Order (Dkt. # 230), the State of Washington submits the following response to the proposed remedial maps submitted by Plaintiffs.

The State does not dispute Plaintiffs’ assertion that each map “is a complete and comprehensive remedy to Plaintiffs’ Section 2 harms . . . .” Dkt. # 245 at p. 2. The State defers to the Court on which remedial map best provides Latino voters with an equal opportunity to elect candidates of their choice while also balancing traditional redistricting criteria and federal law.

1           Additionally, as the Court is well aware, one key consideration in creating LD 15 was  
2 respecting the sovereign interests of the Yakama Nation. These interests should likewise be  
3 respected in any court-ordered remedial map. To the extent the Yakama Nation wishes to be  
4 heard on the matter, the State defers to them to express their own sovereign interests.

5           DATED this 22nd day of December 2023.

6  
7    ROBERT W. FERGUSON  
  Attorney General

8    /s/ Andrew R.W. Hughes  
9    ANDREW R.W. HUGHES, WSBA #49515  
  Assistant Attorney General  
10   800 Fifth Avenue, Suite 2000  
11   Seattle, WA 98104  
  (206) 464-7744  
  andrew.hughes@atg.wa.gov

12   CRISTINA SEPE, WSBA #53609  
13    Deputy Solicitor General  
14   1125 Washington Street SE  
15   PO Box 40100  
  Olympia, WA 98504-0100  
  (360) 753-6200  
  cristina.sepe@atg.wa.gov

16    *Attorneys for Defendant State of Washington*

17    I certify that this memorandum contains 149 words,  
18 in compliance with the Local Civil Rules.

**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 Seattle, Washington.

/s/ Andrew R.W. Hughes  
ANDREW R.W. HUGHES, WSBA #49515  
Assistant Attorney General

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26