IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

GOLDEN BETHUNE-HILL, et al.,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS, *et al.*,

Defendants.

VIRGINIA HOUSE OF DELEGATES, *et al.*

Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-AWA-BMK

PLAINTIFFS' NOTICE OF PROPOSED SPECIAL MASTER CANDIDATES

Plaintiffs submit this response to the Court's September 14, 2018 order instructing the parties to propose candidates to serve as Special Master.

Prior to their submission of this response, Plaintiffs had an opportunity to review the submission of the State Defendants. The State Defendants propose Professor Bernard Grofman and Professor Nathaniel Persily and set out relevant information regarding these candidates. At this time, Plaintiffs have no significant concerns with either candidate.

In particular, Plaintiffs would submit the appointment of Professor Grofman given his recent experience serving as a special master in this Court. Professor Grofman's familiarity with the Commonwealth's redistricting data and this Court would facilitate an efficient remedial process.

Dated: September 20, 2018

Respectfully submitted,

By: /s/ Aria C. Branch

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September, 2018, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

Respectfully submitted,

By <u>/s/ Aria C. Branch</u> Aria C. Branch (VSBNo. 83682) Perkins Coie LLP 700 13th St. N.W., Suite 600 Washington, D.C. 20005-3960 Phone: (202) 654-6338 Fax: (202) 654-9106 Email: ABranch@perkinscoie.com

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