

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.

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

**PLAINTIFFS' MEMORANDUM IN SUPPORT
OF THEIR PROPOSED REMEDIAL PLANS**

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I. INTRODUCTION

Plaintiffs respectfully submit this memorandum in support of their proposed remedial plans pursuant to the Court’s Order dated October 19, 2018 (Dkt. No. 278). The plans—labeled Plaintiffs’ Remedial Plan A (“Plan A”) and Plaintiffs’ Remedial Plan B (“Plan B”)—are attached to the accompanying Declaration of Kevin J. Hamilton.¹

Given the number of districts at issue and the strict 1% population equality standard utilized by the General Assembly—which Plaintiffs follow here—there is admittedly no single and perfect solution to the racial gerrymander of Districts 63, 69, 70, 71, 74, 77, 80, 89, 90, 92, and 95 (the “Challenged Districts”). Plaintiffs offer two remedial maps that are broadly similar, but which tackle the challenge of redressing the baseless application of the 55% Black Voting Age Population (“BVAP”) rule to the Challenged Districts in a handful of different ways.

Both proposed remedial plans cure the unconstitutional racial gerrymander of the Challenged Districts and rebalance the population of affected house districts while respecting traditional redistricting criteria. Plaintiffs’ remedial plans are both more compact than the existing plan and split far fewer political subdivisions. The ease with which the Challenged Districts and the surrounding districts can be redrawn in more sensible configurations illustrates the unnecessary lengths to which the General Assembly went to enforce the mandatory 55% BVAP floor in the Challenged Districts in the first place. For all the reasons stated below, Plaintiffs respectfully ask the Court to adopt one of their proposed remedial plans.²

¹ Plaintiffs have separately filed with the Court hard copies of Plaintiffs’ proposed remedial maps with accompanying data files.

² Plaintiffs do not have a strong preference between the two alternatives. The primary difference between the two proposed plans is set out on page 3 *infra*.

II. BACKGROUND

Following a second bench trial in this matter on remand from the United States Supreme Court, on June 26, 2018, the Court found in Plaintiffs' favor on the merits of their claim that Virginia's current house legislative districting plan violates the equal protection clause of the Fourteenth Amendment to the United States Constitution. Dkt. Nos. 234, 235. Accordingly, the Court ordered that the "Commonwealth of Virginia is hereby enjoined from conducting any elections after [June 26, 2018] for the office of Delegate in the Commonwealth's House of Delegates in the Challenged Districts until a new redistricting plan is adopted." Dkt. No. 235. The Court gave the political branches until October 30, 2018, to adopt a new remedial plan, although it instructed "[t]he Virginia General Assembly . . . to exercise this jurisdiction as expeditiously as possible." *Id.*

After the General Assembly failed to adopt a new districting plan by this deadline,³ the Court ordered the parties to submit proposed remedial plans no later than November 2, 2018. *See* Dkt. No. 278.

III. ARGUMENT

Accompanying this memorandum, Plaintiffs provide the Court with their proposed remedial plans, maps of Plaintiffs' proposed versions of the Challenged Districts and surrounding environs, and reports of the basic demographic details of Plaintiffs' proposals.

As explained below, Plaintiffs' plans cure the fundamental constitutional deficiency in the existing plan (the "Enacted Plan")—the baseless application of a flat 55% BVAP floor to the various and varied Challenged Districts regardless of their unique geography, communities, and electoral history. Plaintiffs' remedial plans preserve the structure of the Enacted Plan, but are superior to the Enacted Plan with respect to every objective metric. The remedial plans' versions of the Challenged Districts are more compact and split fewer political subdivisions than the Enacted Plan. By following traditional districting principles,

³ Intervenors informed the Court on October 5, 2018, of their view that the political branches would be unable to adopt a remedial plan. *See* Dkt. No. 275-1.

Plaintiffs' remedial plans thus unravel the unconstitutional racial gerrymander while preserving the voting rights of African-American voters.

The major difference between Plaintiffs' proposed Plan A and Plan B is in the treatment of Charles City County. At present, Charles City County is part of an elongated District 74 that stretches through a thin strip of Henrico County down to Charles City County to sweep in sufficient BVAP to meet the 55% BVAP rule. Remedyng District 74 is best done by drawing a more compact district centered in Henrico. That leaves Charles City County in need of a new home.

Plaintiffs offer two alternatives. In Plan A, Plaintiffs move Charles City County into District 62. In Plan B, Plaintiffs move Charles City County into District 70. Each option impacts the nearby Richmond-centered districts in different ways. Briefly stated, Plan A keeps District 70 centered in Richmond City County and Henrico County, but requires a greater split of Henrico County and other alterations of Richmond area districts for population equality reasons, whereas Plan B results in District 70 expanding further to the east but requires a less significant split of Henrico County. Both approaches are reasonable—and provide an effective remedy—but require different tradeoffs. Accordingly, Plaintiffs present both for the Special Master's and the Court's consideration.

A. The Court Need Not—and Should Not—Defer to Proposed Remedial Plans Presented by Either Defendants or Intervenors

In taking up the task of creating a constitutional districting plan, it is important to note at the outset that the Court has no constitutional plan before it that has been duly adopted by the political branches in Virginia. In response to the Court's Memorandum Opinion, the General Assembly did not adopt (or even hold a floor vote on) a remedial plan. Had the political branches adopted a remedial plan themselves, the task before the Court would be quite different. In that instance, the Court would likely have deferred to the map duly adopted under Virginia law. But here the political branches failed to adopt a new map manifesting

their judgment on the configuration of Virginia’s legislative districts in the absence of an unconstitutional racial gerrymander of the Challenged Districts.

The Court therefore has no proposed remedial plan before it that is entitled to the Court’s deference. The Enacted Plan is, as the Court has found, unconstitutional and so must be remedied. *See Abrams v. Johnson*, 521 U.S. 74, 85-86 (1997) (adopted redistricting plan “is not owed . . . deference to the extent the plan subordinated traditional districting principles to racial considerations” because “courts [are] to correct—not follow—constitutional defects in districting plans”).

This said, in drafting their remedial plan, Plaintiffs have still sought to minimize the impact of redistricting on the existing districts. *See Personhuballah v. Alcorn*, 155 F. Supp. 3d 552, 563 (E.D. Va. 2016) (adopting remedy that altered five of eleven congressional districts and noting that the plan would “not alter any districts outside of the Third District and those abutting it, but may make substantial changes to those districts”). Plaintiffs have therefore focused alterations to the Enacted Plan to the Challenged Districts and surrounding districts to the extent possible.

B. Plaintiffs’ Proposed Remedial Plans Fix the General Assembly’s Racial Gerrymander of the Challenged Districts

Plaintiffs’ proposed remedial plans achieve the primary objective of the remedial phase of this litigation—curing the unconstitutional racial gerrymander of the Challenged Districts identified by the Court.

As set out in detail in the Memorandum Opinion, the enacted versions of the Challenged Districts were drawn with race as the predominant factor. What that meant for each individual Challenged District varied. As the Court notes, some Challenged Districts were used as “donor” districts, with BVAP siphoned off to bolster the BVAP in “recipient” districts that otherwise may have fallen short of the 55% BVAP floor. Thus, in some instances, a district was drawn to unite far-flung African-American communities, which

explains, for example, the unusual shape of District 95. *See* Dkt. No. 234 (“Mem. Op.”) at 54-55. In other cases, the record shows that the general configuration of a given district (and thus the surrounding districts) was driven by racial considerations, such as Delegate Jones’ acknowledgment that the “eastward move [of District 71] into District 70 was required to ensure that District 71 had sufficient BVAP to meet the 55% number.” *Id.* at 40. Likewise, the record reflected that the borders between districts were drawn to split political subdivisions to achieve the General Assembly’s racial ends. *See, e.g., id.* at 21-22. This explains why the Challenged Districts as a whole split more political subdivisions than the non-Challenged Districts and contributed to the majority of splits in surrounding districts. *See, e.g., id.* at 22-23.

To address these issues in the configuration of the Challenged Districts, Plaintiffs followed the basic approach that Special Master Dr. Bernard Grofman followed in the *Personhubballah* litigation. *See Personhubballah v. Wittman*, No. 3:13-cv-00678, Report of the Special Master, Dkt. No. 272 (Nov. 15, 2015). That is, rather than using race as the predominant factor (as under the Enacted Plan), Plaintiffs’ remedial maps were drawn “according to good government criteria.” *Id.* at 3. Plaintiffs then—like Dr. Grofman did in *Personhubballah*—did basic backstopping of the resulting maps by ensuring the resulting maps were non-retrogressive and making adjustments to maintain the residences of present incumbents in their districts. *Personhubballah v. Wittman*, No. 3:13-cv-00678, Supplemental Comments to the Report of the Special Master, Dkt. No. 294 at 4-5, 15 (Dec. 11, 2015).⁴

The merits of this approach are evident in the results. Indeed, Plaintiffs’ proposed remedial plans are superior to the Enacted Plan in every meaningful respect. As explained below, Plaintiffs split markedly fewer political subdivisions, and they improve the compactness of the Challenged Districts significantly.

⁴ To the best of Plaintiffs’ knowledge, based on address information they were able to locate, Plaintiffs’ proposed plans do not pair incumbents or draw incumbents out of their existing districts.

The natural consequence of doing so was, generally speaking, to lower the BVAP in various Challenged Districts where the BVAP had been artificially inflated through application of the across-the-board 55% BVAP floor. While the BVAP of all but one district in each plan has been reduced, *see* Hamilton Decl., Ex. C, H,⁵ this approach also avoids retrogression in the ability of African Americans to elect candidates of choice. As reflected in Dr. Palmer's analysis, as credited and explicated by the Court in its Opinion, 55% BVAP was not remotely necessary "in order for black voters to be able to elect their preferred candidates" in any of the Challenged Districts. Mem. Op. at 88. Indeed, even a 45% BVAP would have resulted in victory for African-American preferred candidates in all 11 Challenged Districts ranging from 59.4% to 81% of the vote. *Id.* Plaintiffs' proposed plans do not result in a BVAP lower than 46% in any Challenged District, Ex. C, H, meaning that African-American preferred candidates can be expected to win each of these districts by a supermajority or more.

District	Current District BVAP	Plaintiffs' Plan A BVAP	Plaintiffs' Plan B BVAP
63	60.1%	56.2%	56.2%
69	55.9%	51.4%	50.0%
70	57.1%	59.2%	54.8%
71	56.1%	51.6%	51.6%
74	57.9%	52.9%	59.6%
77	59.4%	47.6%	47.6%
80	57.0%	52.5%	52.5%

⁵ In Plaintiffs' Plan A, the BVAP of District 70 increases modestly. The same is true of District 74 in Plaintiffs' Plan B. Both District 70 and District 74 were used as "donor" districts in the Enacted Plan, Mem. Op. 37, and so it is not surprising that in remedying the existing racial gerrymander by following traditional districting principles, these districts increased in BVAP under some plan configurations.

District	Current District BVAP	Plaintiffs' Plan A BVAP	Plaintiffs' Plan B BVAP
89	56.2%	52.4%	52.4%
90	57.5%	46.1%	46.1%
92	61.9%	59.3%	59.3%
95	61.2%	50.2%	50.2%

As further explained below (and reflected in the maps submitted along with this brief), Plaintiffs unraveled the racial gerrymander of the Challenged Districts by uniting political subdivisions that were split in the Enacted Plan and otherwise adhering to traditional districting principles. Plaintiffs did not seek to adhere to a BVAP target or floor in redrawing the Challenged Districts. Indeed, Plaintiffs' plans demonstrate that no such racial threshold was necessary to maintain African-American voting strength in the Challenged Districts.

C. Plaintiffs' Proposed Remedial Plans Achieve Population Equality

The ideal population for each Virginia House district following the 2010 census is 80,010 persons. Plaintiffs' proposed districts are of equal population, with no more than +1% or -1% variance between districts. *See* Hamilton Decl., Ex. C, H.

D. Plaintiffs' Proposed Remedial Plans Better Adhere to Traditional Redistricting Criteria Than the Enacted Plan

1. Plaintiffs' Remedial Plans Reflect Greater Respect for Political Subdivisions than the Enacted Plan

Plaintiffs' proposed remedial plans substantially reduce the number of split political subdivisions in both the Challenged Districts and the map as a whole.

The Challenged Districts used artful political subdivision splits as a key mechanism for achieving its racial aims. *See, e.g.*, Mem. Op. at 22-24. In comparison to the Enacted Plan, Plaintiffs' proposed remedial plans make marked improvements:

	Enacted Plan	Plaintiffs' Plan A	Plaintiffs' Plan B
# of split counties	59	51	52
Total county splits	197	173	174
# of split VTDs	116	82	82
Total VTD splits	236	166	165

See Hamilton Decl., Ex. E, J (Split Political Subdivisions Report for Plan A and B).

Plaintiffs' proposed plans are a substantial improvement over the Enacted Plan, even though Plaintiffs limited changes to the Challenged Districts and surrounding districts.

Thus, Plaintiffs' remedial plans manifest a greater respect for political subdivisions than the Enacted Plan. This is not surprising. Because the General Assembly used race as the predominant consideration in drawing the Challenged Districts, it paid little heed to political boundaries when drawing the Challenged Districts. Ignoring political subdivisions was one of the primary ways the General Assembly was able to meet the 55% BVAP floor in each Challenged District. In “unwinding” this racial gerrymander fully, Plaintiffs' proposed plans include districts that more closely follow Virginia's geographic and political contours, even without making radical changes to the existing plan.

2. Plaintiffs' Remedial Plans Create Compact Districts

The proof of the General Assembly's predominant use of race was also found in the unusual configuration of many of the Challenged Districts. From the way District 95 snaked up the Peninsula to sweep in African-American voters to the way District 80 wove its way through the South Hampton Roads region, the General Assembly disregarded traditional redistricting principles in service of its racial aims.

In restructuring the Challenged Districts, Plaintiffs improved their compactness. Indeed, with a handful of exceptions, their remedial plans either match or improve the compactness of every Challenged District. *See* Hamilton Decl., Ex. D, I (Measure of Compactness Reports for Plan A and Plan B).

Plaintiffs provide a comparison of the compactness of their proposed remedial plans and the Enacted Plan using three common compactness measures. The Reock test compares each district to an ideal circle (considering the circle the best and most compact shape possible) and computes the ratio of the area of the district to the minimum area of a circle sufficiently large to encompass the district. The Polsby-Popper test compares the ratio of a district's area with the area of a circle sharing the same perimeter. Under these two measures, a larger number means the district is more compact. The Schwarzberg measure compares the ratio of the perimeter of the district to the perimeter of a circle of an equal area to that of the district. Under this measure, a smaller number means the district is more compact.

Taken as a whole, and even given the constraint of limiting changes to the Challenged Districts and their immediate environs, Plaintiffs' proposed remedial plans match or improve on the compactness of the Enacted Plan under each of the three measures. The bolded number shows the most compact plan(s):

Plan	Mean Reock	Mean Polsby- Popper	Mean Schwarzberg
Plaintiffs' Plan A	0.37	.26	1.89
Plaintiffs' Plan B	0.36	.26	1.90
Enacted	0.36	.24	2.00

The superior compactness of Plaintiffs' remedial plans manifests more clearly on a district-by-district comparison of the Challenged Districts. In all but two instances, Plaintiffs' iterations of the Challenged Districts are superior. The measurement in bold again reflects, as to each district, which iteration of the Challenged District is most compact:

District	Reock		Polsby-Popper		Schwartzberg	
	Enacted	Plaintiffs	Enacted	Plaintiffs	Enacted	Plaintiffs
63	.25	Plan A: .59 Plan B: .59	.16	Plan A: .51 Plan B: .51	2.31	Plan A: 1.27 Plan B: 1.27
69	.52	Plan A: .46 Plan B: .46	.34	Plan A: .35 Plan B: .37	1.68	Plan A: 1.65 Plan B: 1.60
70	.40	Plan A: .41 Plan B: .30	.19	Plan A: .19 Plan B: .20	2.19	Plan A: 2.16 Plan B: 1.78
71	.33	Plan A: .38 Plan B: .38	.24	Plan A: .30 Plan B: .29	1.99	Plan A: 1.76 Plan B: 1.78
74	.16	Plan A: .26 Plan B: .21	.12	Plan A: .22 Plan B: .22	2.26	Plan A: 1.96 Plan B: 1.93
77	.19	Plan A: .26 Plan B: .26	.15	Plan A: .25 Plan B: .25	2.49	Plan A: 1.99 Plan B: 1.99
80	.26	Plan A: .39 Plan B: .39	.11	Plan A: .28 Plan B: .28	2.92	Plan A: 1.85 Plan B: 1.85
89	.40	Plan A: .50 Plan B: .50	.20	Plan A: .43 Plan B: .43	2.21	Plan A: 1.47 Plan B: 1.47
90	.46	Plan A: .48 Plan B: .48	.20	Plan A: .46 Plan B: .46	2.17	Plan A: 1.44 Plan B: 1.44
92	.34	Plan A: .32 Plan B: .32	.26	Plan A: .31 Plan B: .31	1.89	Plan A: 1.74 Plan B: 1.74
95	.14	Plan A: .25 Plan B: .25	.14	Plan A: .34 Plan B: .34	2.61	Plan A: 1.69 Plan B: 1.69
Average	.31	Plan A: .39 Plan B: .38	.19	Plan A: .33 Plan B: .33	2.25	Plan A: 1.73 Plan B: 1.69

In sum, in the course of curing the constitutional deficiencies of the Challenged Districts and making necessary adjustments to re-achieve population equality, Plaintiffs were able to improve the compactness of the Challenged Districts and the House map as a whole. Had Plaintiffs departed more freely from the contours of the existing districts, they could have improved the compactness of the districts even further.⁶

⁶ The same is true with regard to the final adjustments Plaintiffs made to their Plans to ensure that incumbents were not drawn out of their districts. For example, Plaintiffs found it necessary to split additional VTDs in District 70 and 89 for this purpose. In doing so, Plaintiffs followed the methodology used by Special Master Grofman in *Personhuballah*. See *supra* at 5.

IV. CONCLUSION

For the reasons stated above, Plaintiffs respectfully request that the Court adopt either Plaintiffs' proposed Plan A or Plan B. Both remedial plans clearly and cleanly fix the unconstitutional racial gerrymander of the Challenged Districts. Moreover, though Plaintiffs did not perform radical surgery on other districts, they were still able to improve the objective characteristics of the map in the course of tweaking districts to achieve population equality. Plaintiffs therefore submit that their proposed remedial plans fairly and adequately remedy the unconstitutional gerrymander of the Challenged Districts.

Dated: November 2, 2018

Respectfully submitted,

By: /s/ Aria C. Branch

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November, 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.

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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-GBL-BMK

DECLARATION OF KEVIN J. HAMILTON

I, Kevin J. Hamilton, state that I have personal knowledge of the matters set forth in this declaration and, if sworn as a witness, would testify as follows:

1. I am an attorney practicing at the firm of Perkins Coie LLP and served as a lead counsel for the plaintiffs in this matter.
2. Attached as Exhibit A is a true and correct copy of region maps for the Richmond, Tri-City, South Hampton Roads, and North Hampton Roads regions in Plaintiffs' Remedial Plan A.
3. Attached as Exhibit B is a true and correct copy of maps of each of the Challenged Districts in Plaintiffs' Remedial Plan A.
4. Attached as Exhibit C is a true and correct copy of a Population Summary and Voting Age Population Summary for Plaintiffs' Remedial Plan A.

5. Attached as Exhibit D is a true and correct copy of a Measures of Compactness report for Plaintiffs' Remedial Plan A.

6. Attached as Exhibit E is a true and correct copy of a Political Subdivisions Split Between Districts report for Plaintiffs' Remedial Plan A.

7. Attached as Exhibit F is a true and correct copy of region maps for the Richmond, Tri-City, South Hampton Roads, and North Hampton Roads regions in Plaintiffs' Remedial Plan B.

8. Attached as Exhibit G is a true and correct copy of maps of each of the Challenged Districts in Plaintiffs' Remedial Plan B.

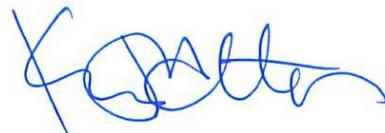
9. Attached as Exhibit H is a true and correct copy of a Population Summary and Voting Age Population Summary for Plaintiffs' Remedial Plan B.

10. Attached as Exhibit I is a true and correct copy of a Measures of Compactness report for Plaintiffs' Remedial Plan B.

11. Attached as Exhibit J is a true and correct copy of a Political Subdivisions Split Between Districts report for Plaintiffs' Remedial Plan B.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed this 2nd day of November, 2018 in Philadelphia, Pennsylvania.



Kevin J. Hamilton

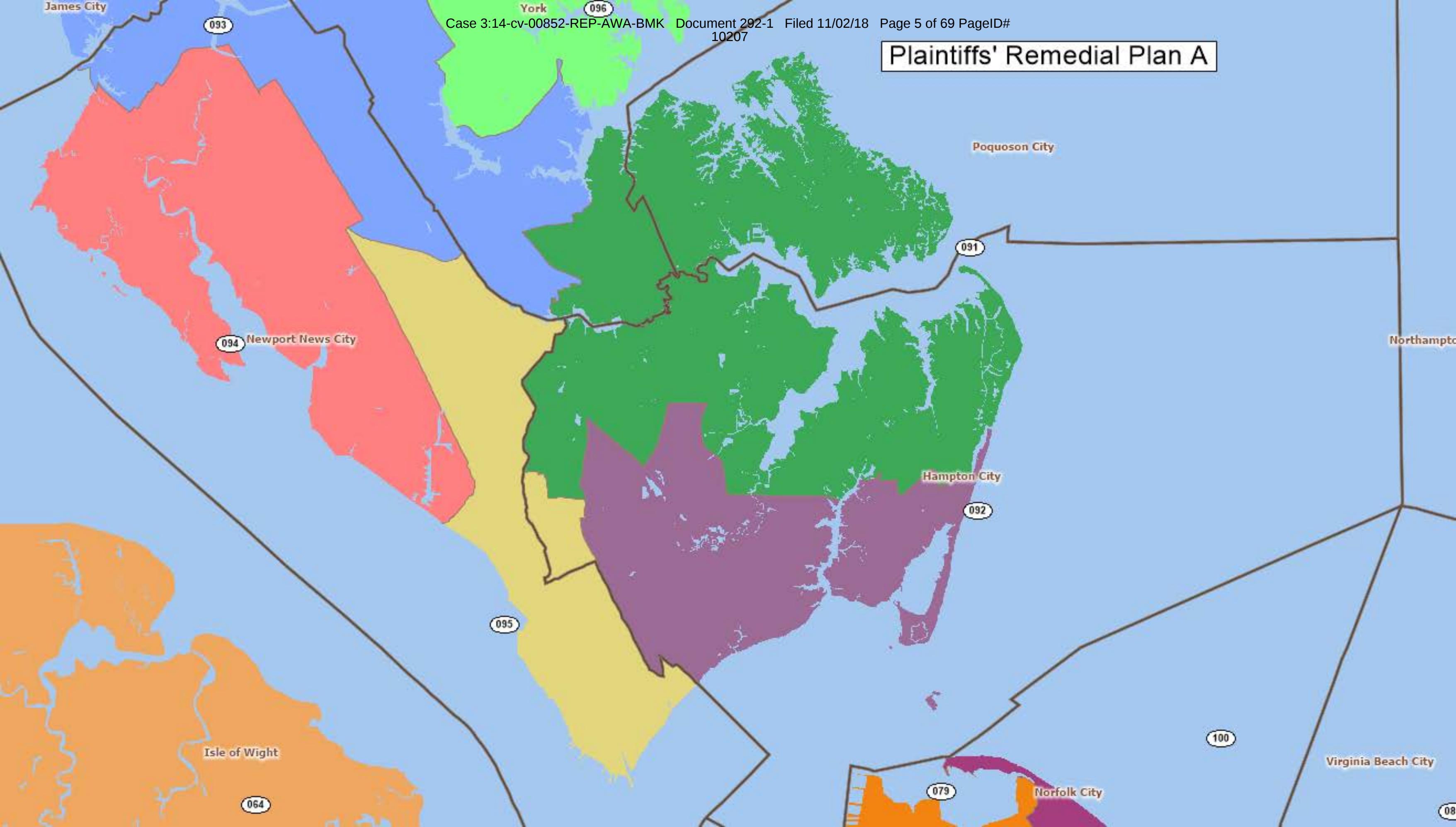
CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a copy to counsel of record.

/s/ Aria Branch
ARIA BRANCH

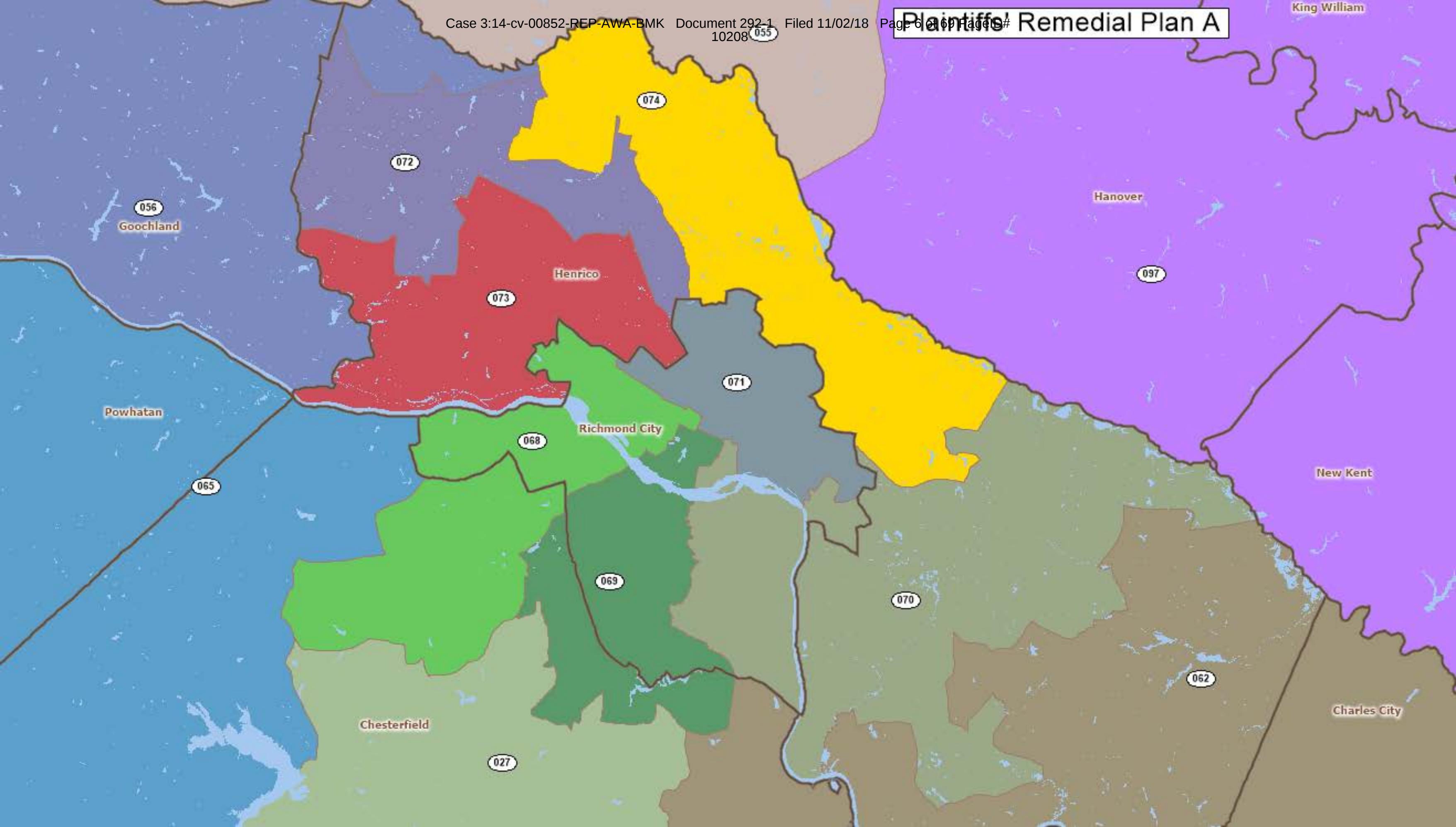
EXHIBIT A

DECLARATION OF KEVIN J. HAMILTON

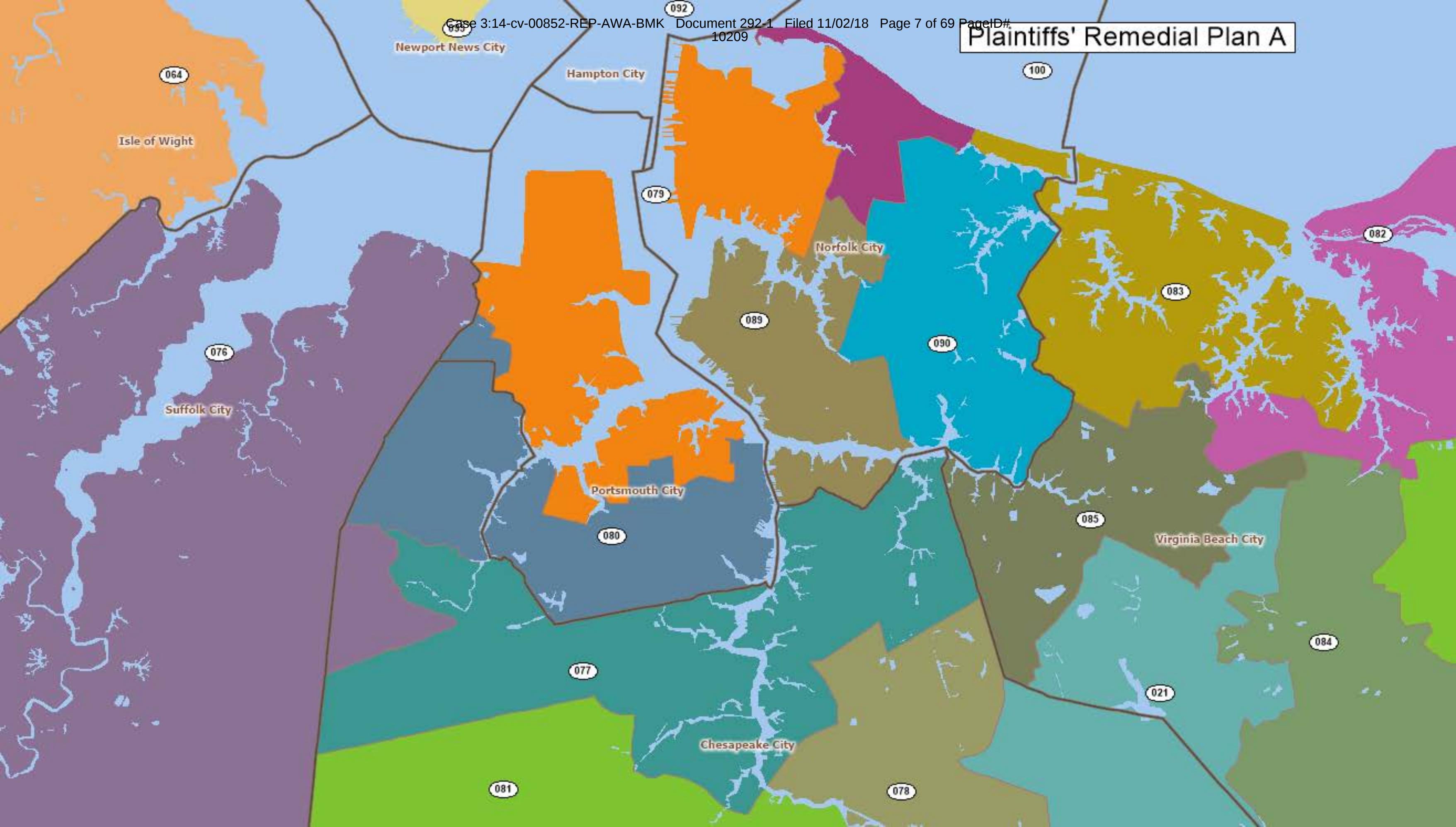


Plaintiffs' Remedial Plan A

King William



Plaintiffs' Remedial Plan A



Plaintiffs' Remedial Plan A

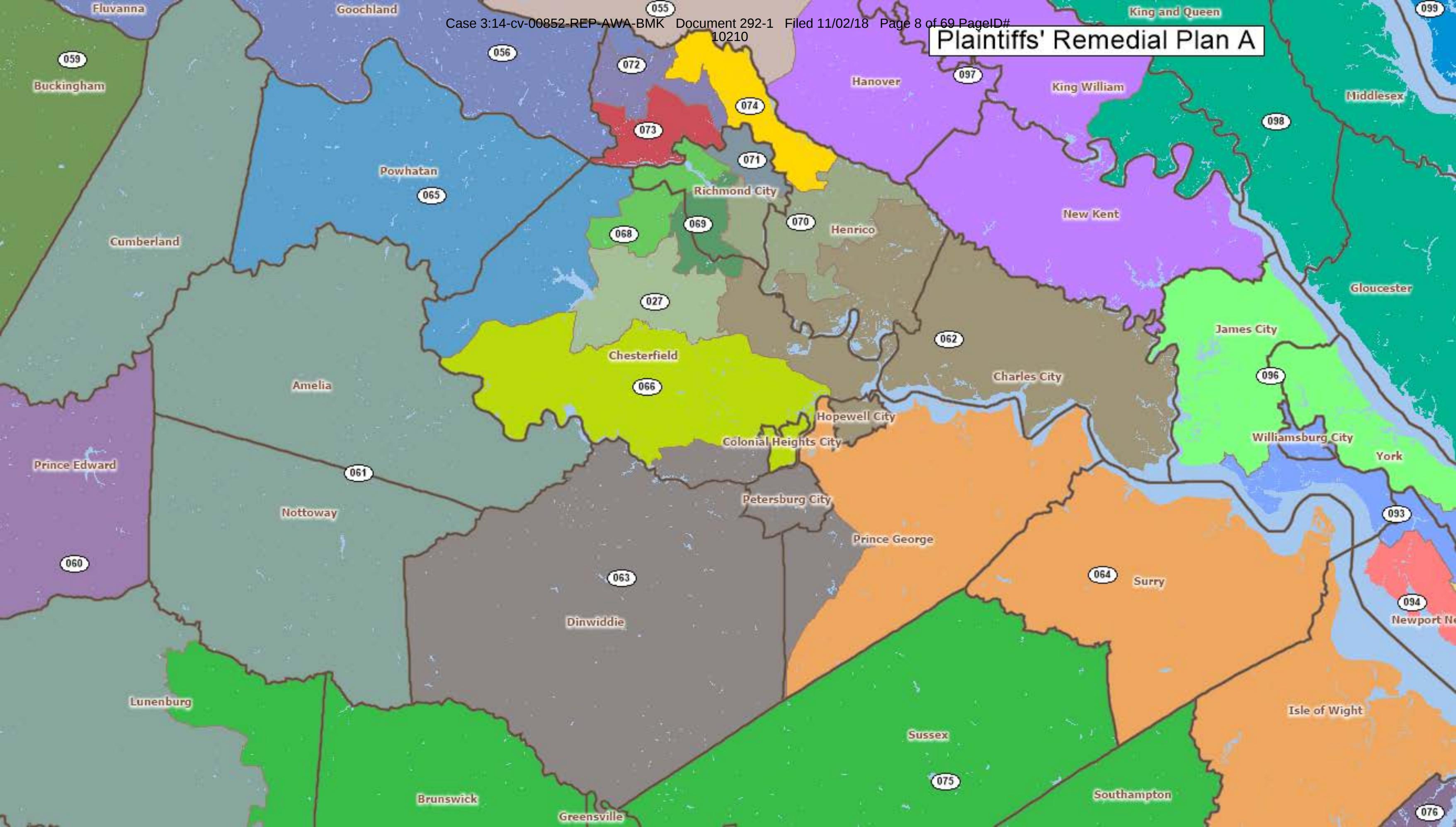
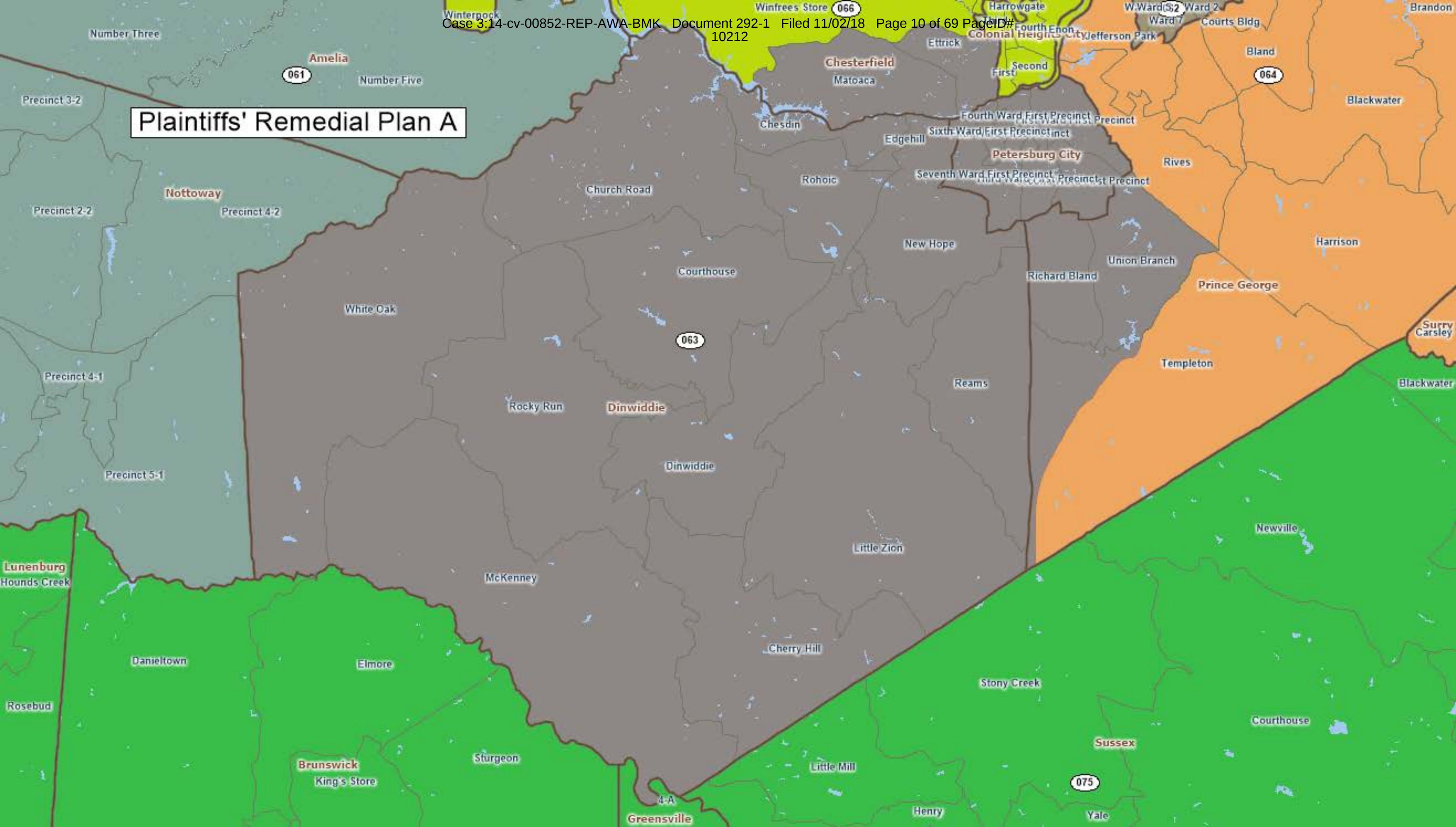


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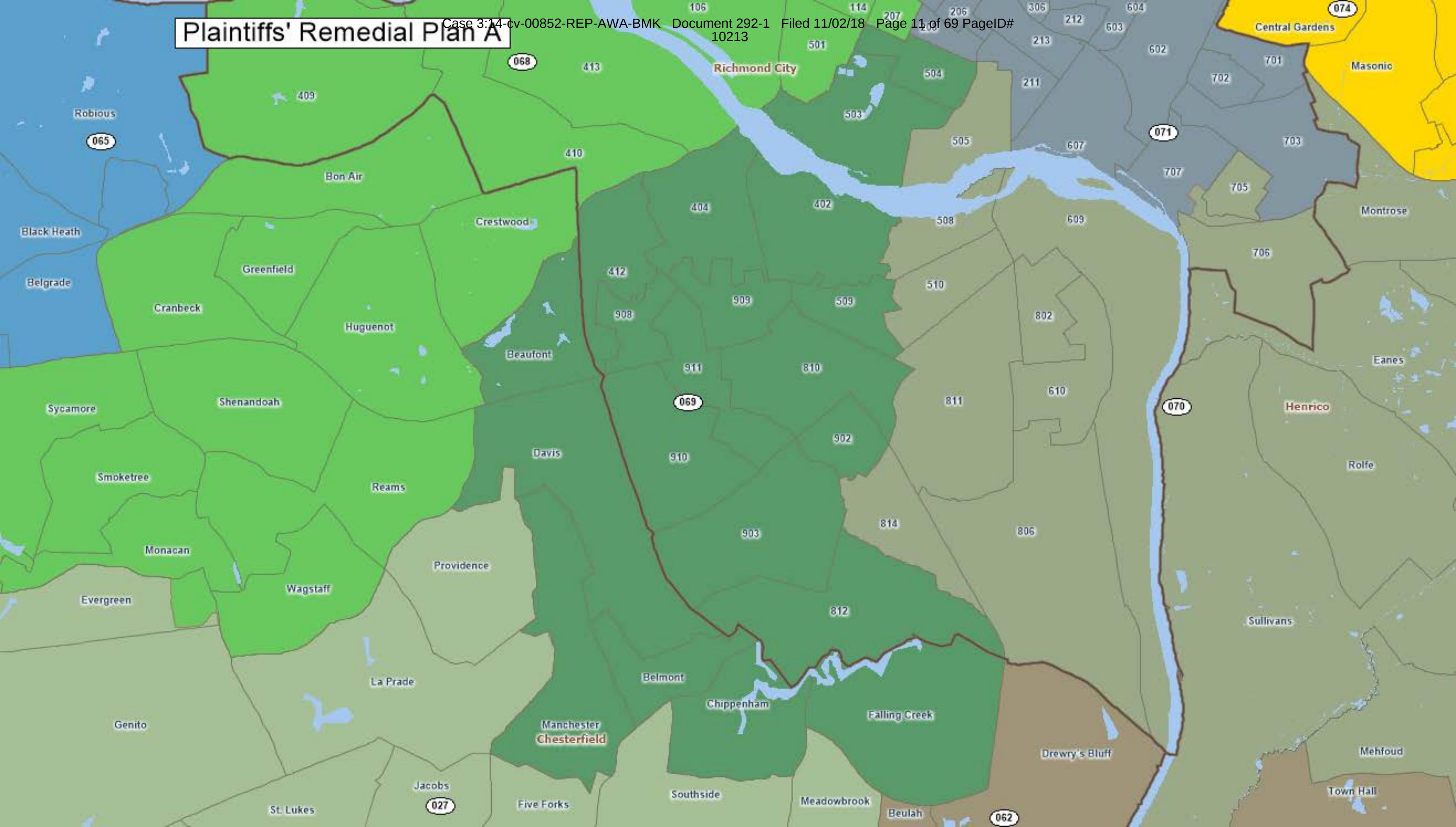
DECLARATION OF KEVIN J. HAMILTON

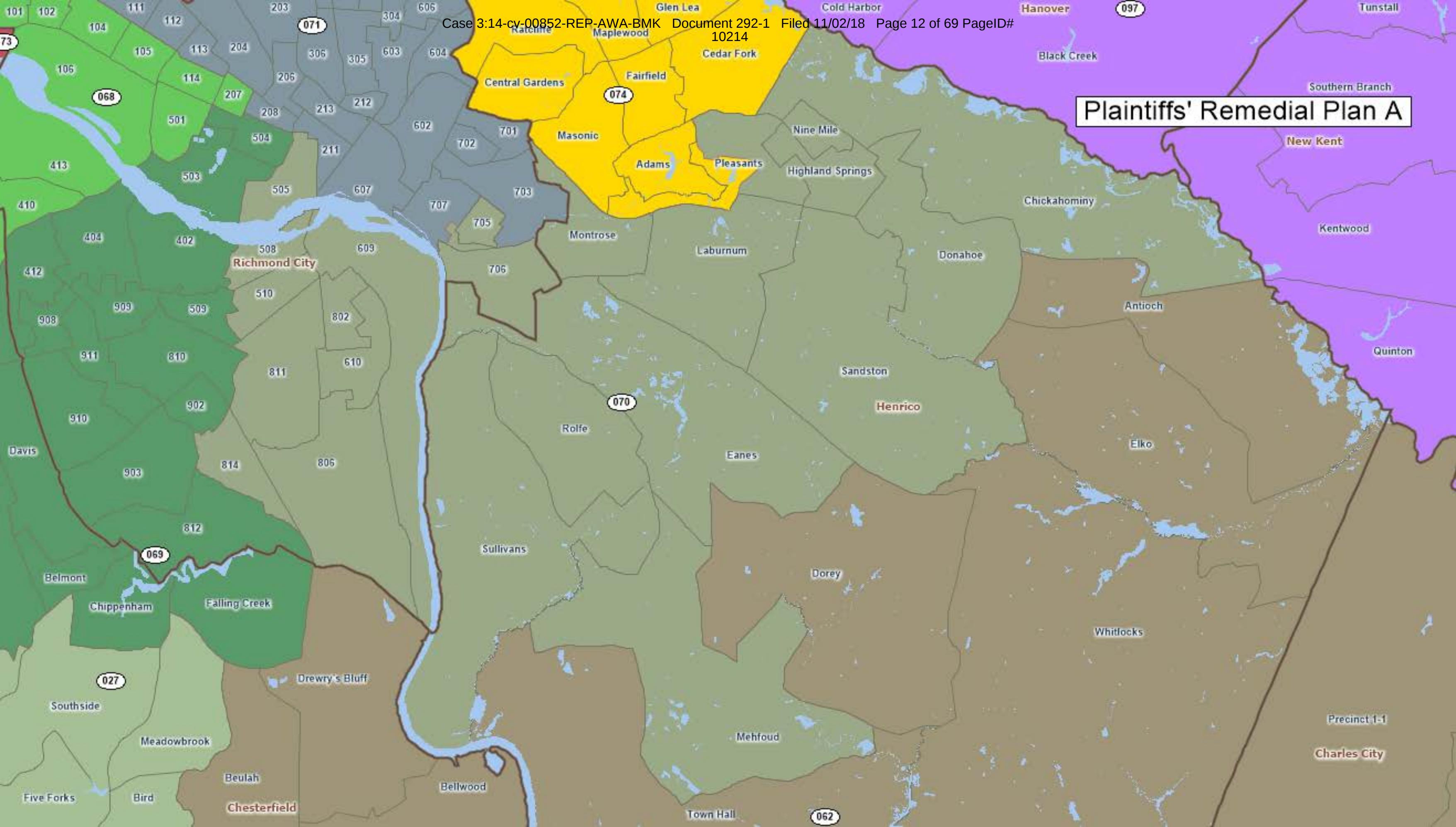
Plaintiffs' Remedial Plan A



Plaintiffs' Remedial Plan A

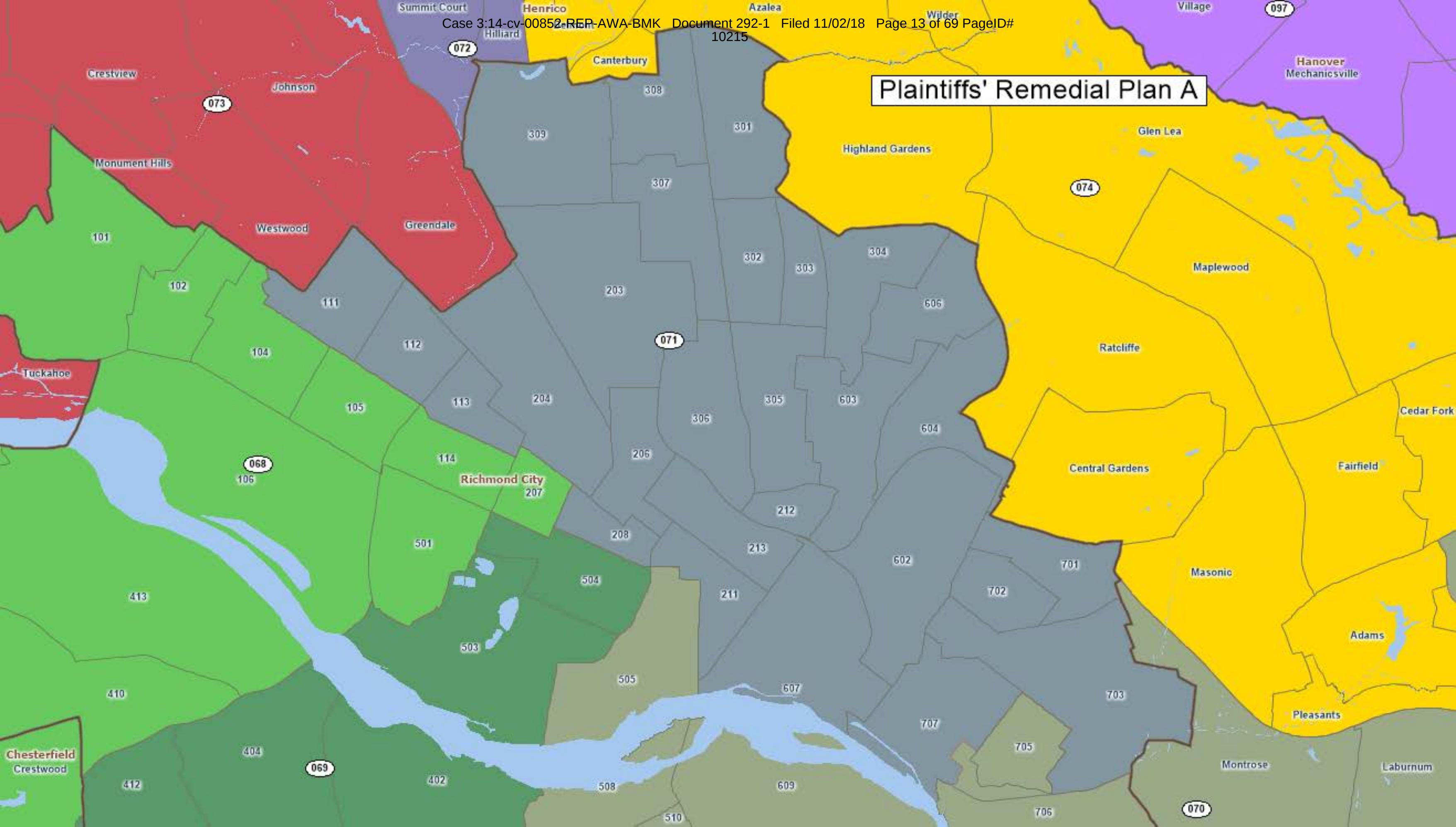
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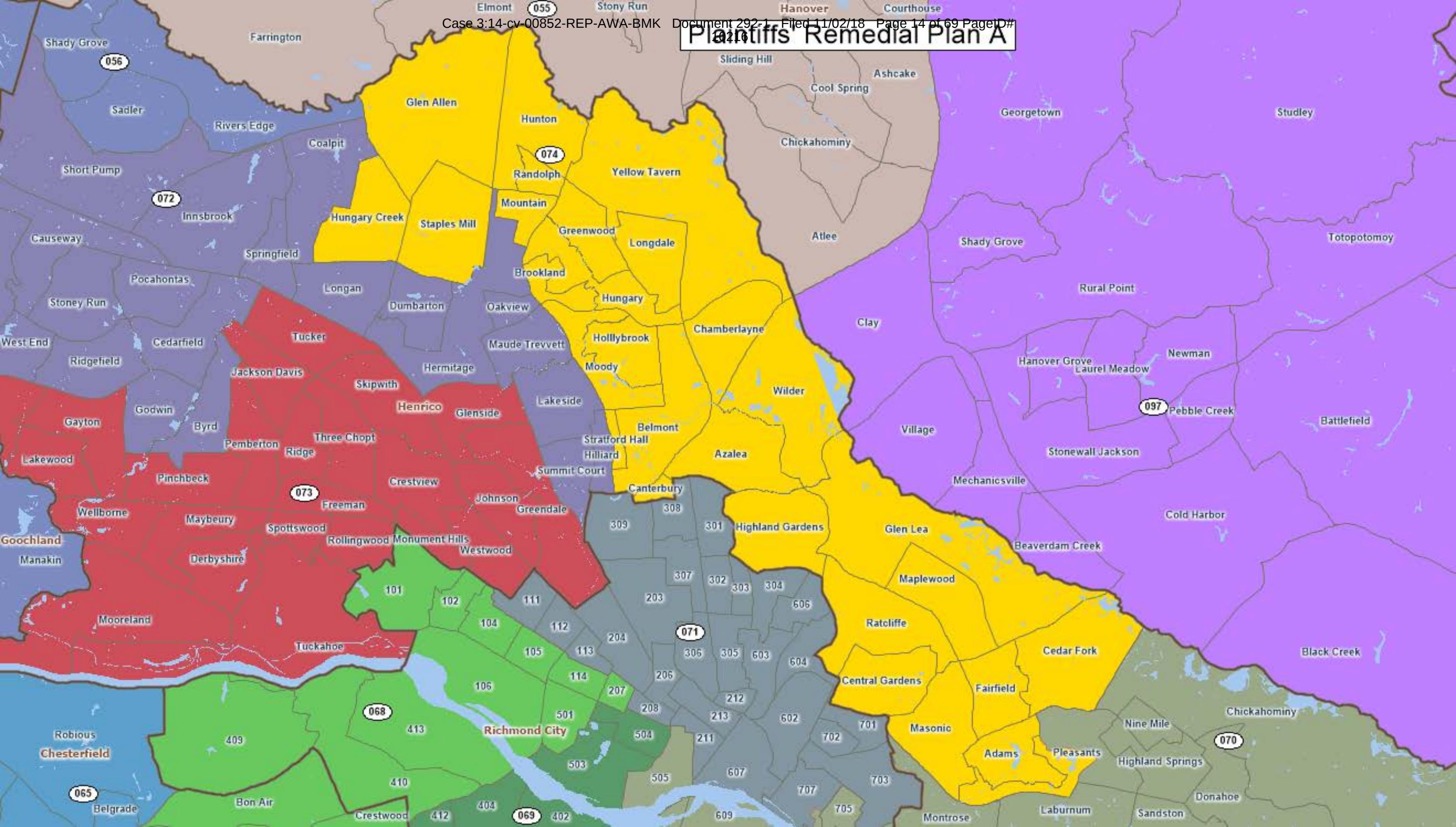


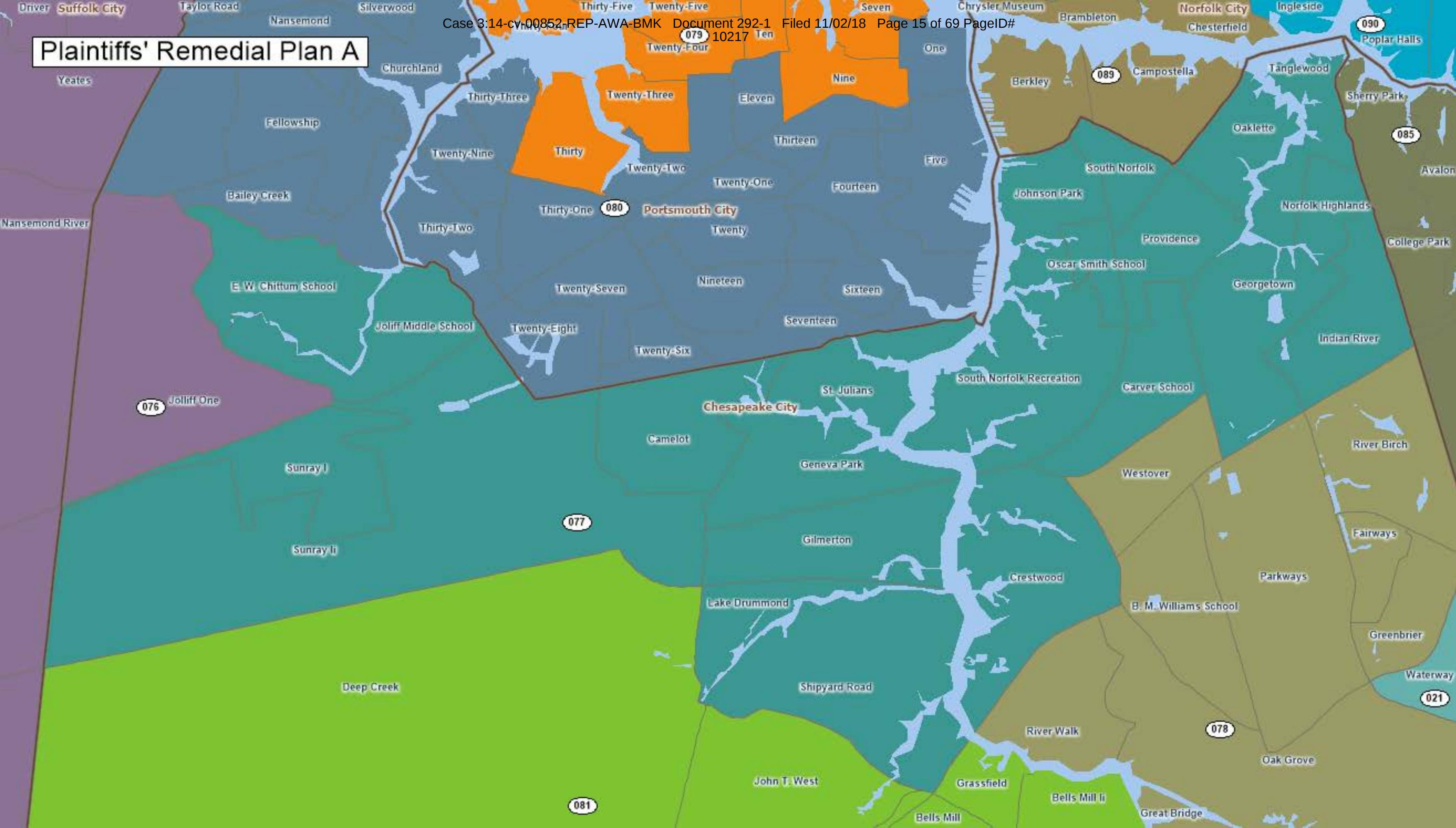
Plaintiffs' Remedial Plan A

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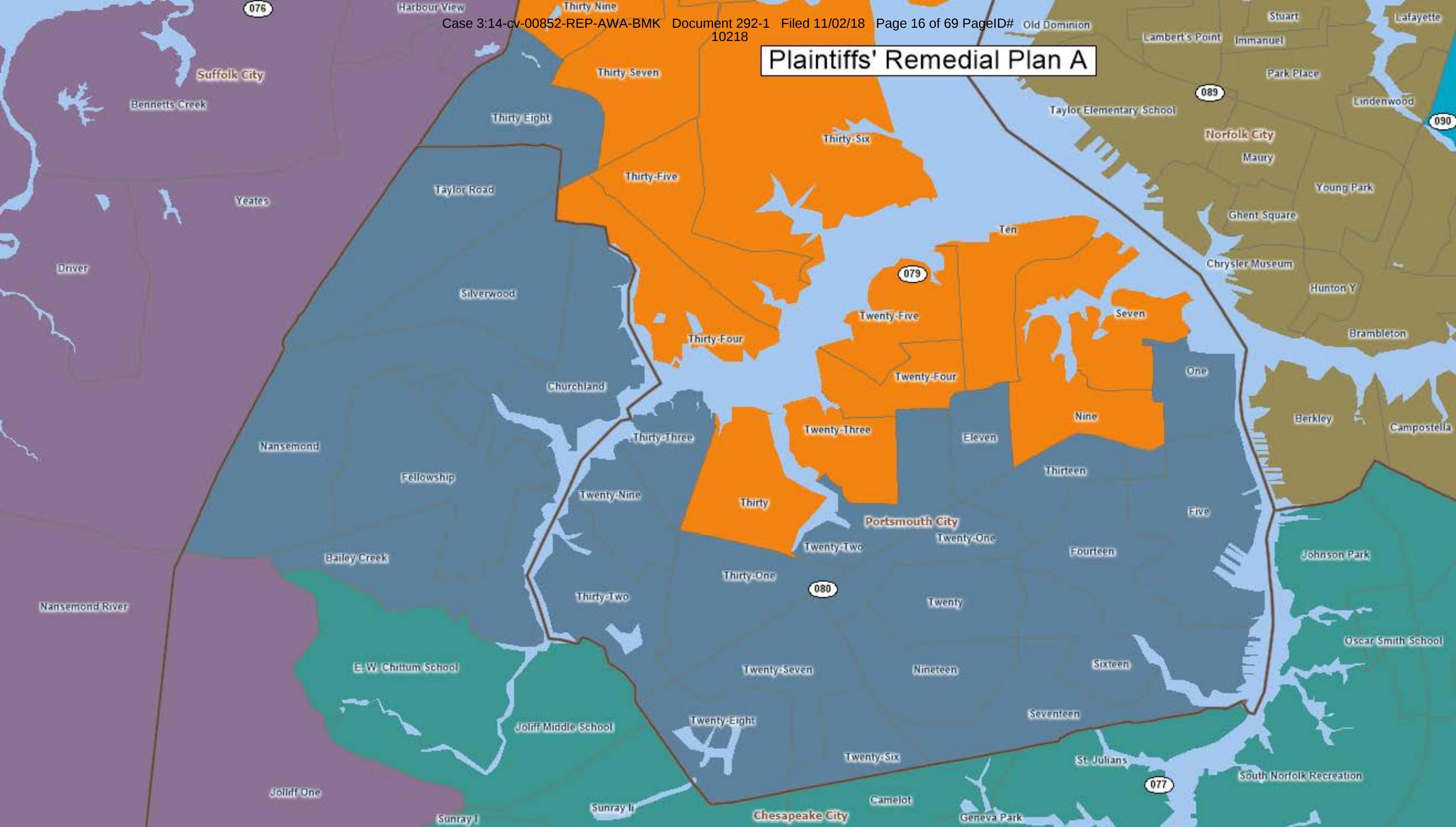


Plaintiffs' Remedial Plan A

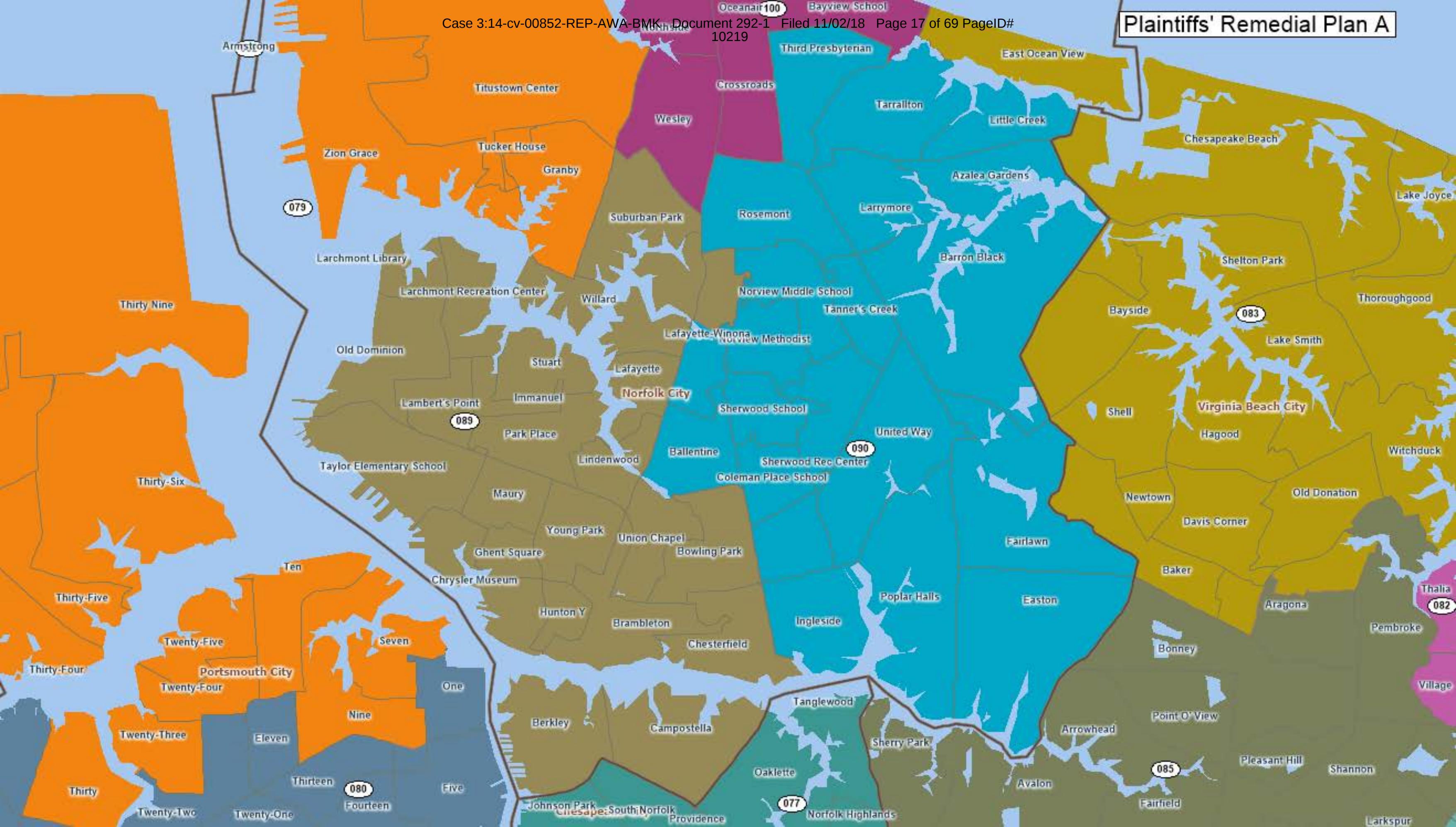




Plaintiffs' Remedial Plan A



Plaintiffs' Remedial Plan A



Plaintiffs' Remedial Plan A

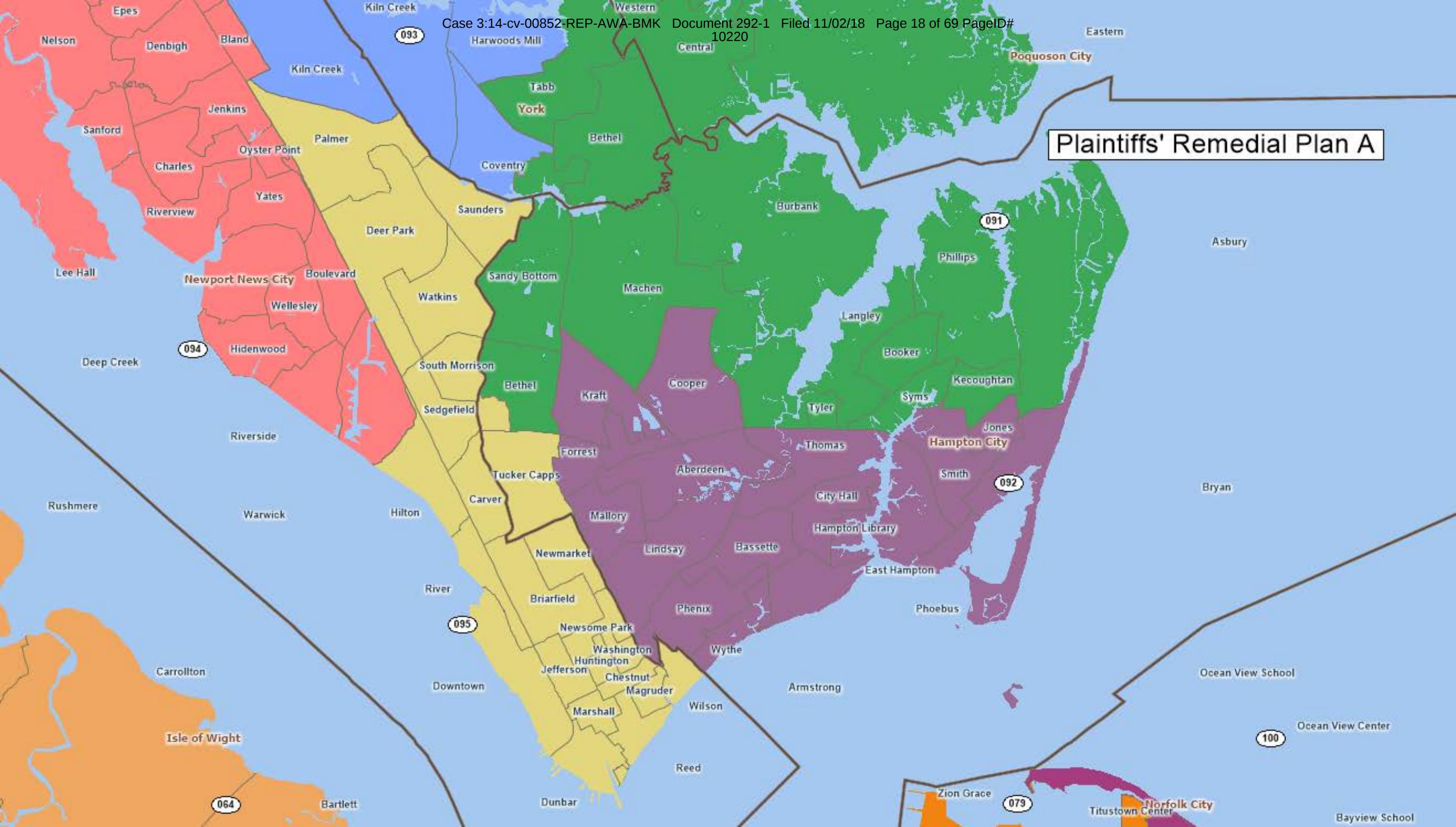


EXHIBIT C

DECLARATION OF KEVIN J. HAMILTON

S1080	79,924	-86	-0.11%	32,607	40.8%	44,098	55.2%	42,761	53.5%	2,389	3.0%	336	0.4%	1,229	1.5%	102	0.1%	820	1.0%
S1081	80,691	681	0.85%	60,992	75.6%	14,384	17.8%	13,174	16.3%	4,450	5.5%	298	0.4%	2,119	2.6%	96	0.1%	1,245	1.5%
S1082	79,504	-506	-0.63%	64,133	80.7%	10,250	12.9%	9,023	11.3%	4,668	5.9%	309	0.4%	2,043	2.6%	98	0.1%	1,350	1.7%
S1083	80,774	764	0.95%	53,040	65.7%	20,669	25.6%	19,256	23.8%	5,123	6.3%	332	0.4%	3,478	4.3%	133	0.2%	1,647	2.0%
S1084	79,655	-355	-0.44%	50,866	63.9%	18,664	23.4%	17,068	21.4%	6,111	7.7%	301	0.4%	5,968	7.5%	160	0.2%	1,730	2.2%
S1085	80,754	744	0.93%	52,551	65.1%	19,037	23.6%	17,489	21.7%	5,050	6.3%	378	0.5%	5,295	6.6%	117	0.1%	1,634	2.0%
S1086	80,747	737	0.92%	46,400	57.5%	7,132	8.8%	6,369	7.9%	17,163	21.3%	351	0.4%	15,998	19.8%	42	0.1%	8,162	10.1%
S1087	79,275	-735	-0.92%	44,093	55.6%	7,429	9.4%	6,483	8.2%	11,761	14.8%	236	0.3%	19,678	24.8%	54	0.1%	5,109	6.4%
S1088	80,191	181	0.23%	60,158	75.0%	12,879	16.1%	11,480	14.3%	7,188	9.0%	261	0.3%	2,108	2.6%	95	0.1%	3,356	4.2%
S1089	80,517	507	0.63%	31,318	38.9%	45,497	56.5%	44,279	55.0%	2,558	3.2%	232	0.3%	1,913	2.4%	56	0.1%	751	0.9%
S1090	79,228	-782	-0.98%	33,391	42.1%	38,860	49.0%	37,049	46.8%	5,285	6.7%	341	0.4%	3,379	4.3%	114	0.1%	1,859	2.3%
S1091	79,503	-507	-0.63%	51,706	65.0%	22,177	27.9%	20,508	25.8%	3,604	4.5%	332	0.4%	2,719	3.4%	94	0.1%	1,009	1.3%
S1092	79,959	-51	-0.05%	27,332	34.2%	49,076	61.4%	47,056	58.9%	3,528	4.4%	347	0.4%	1,317	1.6%	82	0.1%	1,037	1.3%
S1093	79,232	-778	-0.97%	53,806	67.9%	18,041	22.8%	16,524	20.9%	5,061	6.4%	268	0.3%	3,804	4.8%	137	0.2%	1,673	2.1%
S1094	79,268	-742	-0.93%	45,286	57.1%	27,456	34.6%	25,249	31.9%	6,442	8.1%	389	0.5%	2,547	3.2%	159	0.2%	2,051	2.6%
S1095	79,667	-343	-0.43%	32,062	40.2%	42,862	53.8%	40,935	51.4%	4,917	6.2%	367	0.5%	1,271	1.6%	81	0.1%	2,105	2.6%
S1096	79,217	-793	-0.99%	62,755	79.2%	11,949	15.1%	10,948	13.8%	3,357	4.2%	266	0.3%	2,069	2.6%	78	0.1%	1,001	1.3%
S1097	79,386	-624	-0.78%	67,533	85.1%	8,951	11.3%	8,379	10.6%	1,606	2.0%	597	0.8%	947	1.2%	29	0.0%	503	0.6%
S1098	79,251	-759	-0.95%	63,155	79.7%	13,769	17.4%	12,959	16.4%	1,870	2.4%	403	0.5%	519	0.7%	23	0.0%	536	0.7%
S1099	80,332	322	0.40%	56,801	70.7%	20,709	25.8%	19,785	24.6%	2,971	3.7%	353	0.4%	551	0.7%	27	0.0%	1,183	1.5%
S1100	80,680	670	0.84%	50,700	62.8%	24,232	30.0%	23,019	28.5%	6,746	8.4%	403	0.5%	1,280	1.6%	125	0.2%	2,785	3.5%

S1080	60,143	-86	-0.11%	26,160	43.5%	31,588	52.5%	31,021	51.6%	1,616	2.7%	254	0.3%	988	1.6%	73	0.1%	643	0.8%
S1081	59,929	681	0.85%	46,145	77.0%	10,247	17.1%	9,827	16.4%	2,736	4.6%	247	0.3%	1,606	2.7%	75	0.1%	833	1.0%
S1082	62,865	-506	-0.63%	52,024	82.8%	7,125	11.3%	6,572	10.5%	3,146	5.0%	245	0.3%	1,644	2.6%	78	0.1%	973	1.2%
S1083	62,705	764	0.95%	43,306	69.1%	14,282	22.8%	13,702	21.9%	3,440	5.5%	252	0.3%	2,769	4.4%	82	0.1%	1,174	1.5%
S1084	58,375	-355	-0.44%	38,245	65.5%	12,905	22.1%	12,315	21.1%	3,880	6.6%	235	0.3%	4,662	8.0%	122	0.2%	1,205	1.5%
S1085	62,044	744	0.93%	42,008	67.7%	13,228	21.3%	12,636	20.4%	3,335	5.4%	294	0.4%	4,279	6.9%	102	0.1%	1,171	1.5%
S1086	59,286	737	0.92%	34,944	58.9%	5,108	8.6%	4,802	8.1%	12,059	20.3%	219	0.3%	11,609	19.6%	33	0.0%	5,779	7.2%
S1087	55,787	-735	-0.92%	32,124	57.6%	5,006	9.0%	4,654	8.3%	7,895	14.2%	147	0.2%	13,563	24.3%	42	0.1%	3,505	4.4%
S1088	58,354	181	0.23%	45,104	77.3%	8,479	14.5%	7,991	13.7%	4,545	7.8%	197	0.2%	1,584	2.7%	78	0.1%	2,206	2.8%
S1089	62,820	507	0.63%	26,850	42.7%	32,912	52.4%	32,204	51.3%	1,899	3.0%	192	0.2%	1,700	2.7%	47	0.1%	577	0.7%
S1090	60,733	-782	-0.98%	27,546	45.4%	27,979	46.1%	27,252	44.9%	3,513	5.8%	273	0.3%	2,736	4.5%	92	0.1%	1,350	1.7%
S1091	58,986	-507	-0.63%	39,836	67.5%	15,250	25.9%	14,558	24.7%	2,217	3.8%	229	0.3%	2,108	3.6%	74	0.1%	671	0.8%
S1092	62,382	-51	-0.06%	22,724	36.4%	36,972	59.3%	35,936	57.6%	2,373	3.8%	282	0.4%	1,067	1.7%	64	0.1%	766	1.0%
S1093	62,281	-778	-0.97%	44,052	70.7%	12,756	20.5%	12,119	19.5%	3,443	5.5%	217	0.3%	3,088	5.0%	101	0.1%	1,169	1.5%
S1094	60,264	-742	-0.93%	36,779	61.0%	18,647	30.9%	17,735	29.4%	4,254	7.1%	305	0.4%	2,030	3.5%	117	0.1%	1,485	1.9%
S1095	60,645	-343	-0.43%	26,657	44.0%	30,437	50.2%	29,594	48.8%	3,319	5.5%	283	0.4%	1,049	1.7%	61	0.1%	1,545	1.9%
S1096	61,067	-793	-0.99%	49,447	81.0%	8,583	14.1%	8,227	13.5%	2,119	3.5%	192	0.2%	1,578	2.6%	57	0.1%	661	0.8%
S1097	60,024	-624	-0.78%	51,473	85.8%	6,626	11.0%	6,433	10.7%	969	1.6%	451	0.6%	702	1.2%	20	0.0%	322	0.4%
S1098	62,740	-759	-0.95%	50,614	80.7%	10,481	16.7%	10,201	16.3%	1,205	1.9%	322	0.4%	395	0.6%	17	0.0%	385	0.5%
S1099	63,534	322	0.40%	46,161	72.7%	15,464	24.3%	15,150	23.8%	1,916	3.0%	278	0.3%	421	0.7%	22	0.0%	747	0.9%
S1100	63,387	670	0.84%	41,814	66.0%	17,524	27.6%	17,066	26.9%	4,344	6.9%	322	0.4%	1,030	1.6%	104	0.1%	1,858	2.3%

EXHIBIT D

DECLARATION OF KEVIN J. HAMILTON

Plan Type:

Date: 11/2/2018

Time: 1:15:03AM

Administrator:

Measures of Compactness

11/2/2018

Sum	N/A	N/A	N/A
Min	0.16	1.23	0.09
Max	0.62	2.95	0.63
Mean	0.37	1.89	0.26
Std. Dev.	0.11	0.31	0.10

DISTRICT	Reock	Schwartzberg	Polby-Popper
51001	0.26	1.69	0.30
51002	0.30	2.17	0.18
51003	0.28	1.84	0.21
51004	0.49	1.97	0.20
51005	0.19	2.29	0.17
51006	0.27	1.82	0.26
51007	0.50	1.81	0.25
51008	0.47	1.83	0.26
51009	0.35	1.83	0.24
51010	0.23	2.16	0.18
51011	0.59	1.80	0.26
51012	0.39	1.95	0.22
51013	0.16	2.53	0.13
51014	0.24	2.34	0.16
51015	0.55	1.52	0.34
51016	0.36	2.11	0.18
51017	0.25	2.95	0.09
51018	0.62	1.92	0.24
51019	0.43	2.09	0.17
51020	0.27	2.28	0.15
51021	0.42	1.74	0.31
51022	0.20	2.59	0.11
51023	0.26	2.25	0.15
51024	0.44	1.78	0.25
51025	0.26	2.14	0.18
51026	0.46	1.57	0.36
51027	0.48	1.75	0.29
51028	0.39	1.82	0.26
51029	0.36	1.98	0.21
51030	0.53	1.49	0.36
51031	0.38	2.11	0.19
51032	0.46	1.64	0.31
51033	0.33	1.89	0.23
51034	0.24	1.91	0.22
51035	0.20	2.11	0.19
51036	0.43	1.66	0.30
51037	0.18	2.24	0.18
51038	0.62	1.44	0.45
51039	0.35	2.16	0.19
51040	0.26	2.20	0.17

DISTRICT	Reock	Schwartzberg	Polisby-Popper
51041	0.36	1.72	0.32
51042	0.35	2.09	0.20
51043	0.22	2.10	0.21
51044	0.43	1.69	0.32
51045	0.29	1.81	0.26
51046	0.52	1.28	0.55
51047	0.41	1.73	0.33
51048	0.18	2.24	0.16
51049	0.24	2.35	0.16
51050	0.46	1.62	0.34
51051	0.24	2.15	0.18
51052	0.23	1.92	0.25
51053	0.46	1.69	0.34
51054	0.47	1.89	0.25
51055	0.57	1.69	0.28
51056	0.45	1.85	0.26
51057	0.45	1.47	0.41
51058	0.32	2.11	0.19
51059	0.30	1.98	0.21
51060	0.38	1.62	0.31
51061	0.32	2.21	0.17
51062	0.34	1.93	0.18
51063	0.59	1.27	0.51
51064	0.29	2.12	0.17
51065	0.49	1.57	0.35
51066	0.30	1.73	0.29
51067	0.32	1.84	0.25
51068	0.34	1.74	0.31
51069	0.46	1.65	0.35
51070	0.41	2.16	0.19
51071	0.38	1.76	0.30
51072	0.29	2.18	0.20
51073	0.39	1.93	0.24
51074	0.26	1.96	0.22
51075	0.41	1.56	0.32
51076	0.45	1.44	0.47
51077	0.26	1.99	0.25
51078	0.44	1.74	0.32
51079	0.44	1.76	0.27
51080	0.39	1.85	0.28
51081	0.37	1.81	0.28
51082	0.55	1.47	0.45
51083	0.44	1.72	0.32
51084	0.41	1.74	0.30
51085	0.39	1.89	0.27
51086	0.35	1.98	0.25
51087	0.22	2.30	0.17
51088	0.28	2.56	0.13
51089	0.50	1.47	0.43
51090	0.48	1.44	0.46
51091	0.48	1.41	0.49
51092	0.32	1.74	0.31
51093	0.21	2.45	0.15
51094	0.48	1.23	0.63
51095	0.25	1.69	0.34
51096	0.20	2.19	0.17

DISTRICT	Reock	Schwartzberg	Polisby-Popper
51097	0.43	1.73	0.21
51098	0.28	1.78	0.26
51099	0.27	1.97	0.21
51100	0.29	1.51	0.39

EXHIBIT E

DECLARATION OF KEVIN J. HAMILTON

Plan Name: Plaintiffs' Remedial Plan A
Plan Type:
Administrator:

Political Subdivisions Split Between Districts

Friday November 2, 2018

12:16 AM

Number of subdivisions not split:

County	83
Voting District	2,291

Number of subdivisions split into more than one district:

County	51
Voting District	82

Number of subdivision splits which affect *no* population:

County	2
Voting District	3

Split Counts

County

Cases where an area is split among 2 Districts: 24
Cases where an area is split among 3 Districts: 14
Cases where an area is split among 4 Districts: 5
Cases where an area is split among 5 Districts: 1
Cases where an area is split among 6 Districts: 2
Cases where an area is split among 7 Districts: 3
Cases where an area is split among 8 Districts: 1
Cases where an area is split among 17 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 80
Cases where an area is split among 3 Districts: 2

County	Voting District	District	Population
<i>Split Counties :</i>			
Albemarle VA		51025	21,420
Albemarle VA		51057	37,303
Albemarle VA		51058	30,929
Albemarle VA		51059	9,318
Alexandria City VA		51045	59,633
Alexandria City VA		51046	80,333
Amherst VA		51023	10,678
Amherst VA		51024	21,675
Arlington VA		51045	14,388

Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties</i> (continued):			
Arlington VA	51047	80,757	
Arlington VA	51048	55,008	
Arlington VA	51049	57,474	
Augusta VA	51020	24,485	
Augusta VA	51024	17,273	
Augusta VA	51025	31,992	
Bedford VA	51019	22,948	
Bedford VA	51022	28,780	
Bedford VA	51023	16,948	
Botetourt VA	51017	4,449	
Botetourt VA	51019	28,699	
Campbell VA	51022	17,154	
Campbell VA	51059	30,664	
Campbell VA	51060	7,024	
Caroline VA	51054	2,484	
Caroline VA	51055	19,742	
Caroline VA	51099	6,319	
Chesapeake City VA	51021	5,030	
Chesapeake City VA	51076	2,057	
Chesapeake City VA	51077	80,448	
Chesapeake City VA	51078	80,037	
Chesapeake City VA	51080	21,946	
Chesapeake City VA	51081	32,691	
Chesterfield VA	51027	79,469	
Chesterfield VA	51062	40,229	
Chesterfield VA	51063	13,302	
Chesterfield VA	51065	51,636	
Chesterfield VA	51066	61,919	
Chesterfield VA	51068	44,427	
Chesterfield VA	51069	25,254	
Clarke VA	51010	4,309	
Clarke VA	51033	9,725	
Culpeper VA	51018	12,895	
Culpeper VA	51030	33,794	
Fairfax VA	51034	53,301	
Fairfax VA	51035	80,213	
Fairfax VA	51036	79,746	
Fairfax VA	51037	57,690	
Fairfax VA	51038	80,758	
Fairfax VA	51039	80,710	
Fairfax VA	51040	66,026	
Fairfax VA	51041	80,792	
Fairfax VA	51042	79,964	
Fairfax VA	51043	80,750	
Fairfax VA	51044	80,796	
Fairfax VA	51045	6,219	
Fairfax VA	51048	24,484	
Fairfax VA	51049	23,135	
Fairfax VA	51053	67,717	
Fairfax VA	51067	70,636	

Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties</i> (continued):			
Fairfax VA		51086	68,789
Fauquier VA		51018	40,915
Fauquier VA		51031	15,101
Fauquier VA		51088	9,187
Fluvanna VA		51056	7,231
Fluvanna VA		51058	18,460
Franklin VA		51009	46,650
Franklin VA		51022	9,509
Frederick VA		51010	13,649
Frederick VA		51029	43,969
Frederick VA		51033	20,687
Fredericksburg City VA		51028	8,950
Fredericksburg City VA		51088	15,336
Hampton City VA		51091	50,673
Hampton City VA		51092	79,959
Hampton City VA		51095	6,804
Hanover VA		51055	50,481
Hanover VA		51097	49,382
Henrico VA		51056	13,165
Henrico VA		51062	9,989
Henrico VA		51070	43,739
Henrico VA		51072	80,432
Henrico VA		51073	79,730
Henrico VA		51074	79,880
Henry VA		51009	15,434
Henry VA		51014	15,368
Henry VA		51016	23,349
James City VA		51093	20,694
James City VA		51096	46,315
King William VA		51097	11,575
King William VA		51098	4,360
Loudoun VA		51010	62,659
Loudoun VA		51032	80,268
Loudoun VA		51033	50,138
Loudoun VA		51034	27,421
Loudoun VA		51067	8,997
Loudoun VA		51086	11,958
Loudoun VA		51087	70,870
Lunenburg VA		51061	8,470
Lunenburg VA		51075	4,444
Lynchburg City VA		51022	23,864
Lynchburg City VA		51023	51,704
Montgomery VA		51007	35,026
Montgomery VA		51008	17,599
Montgomery VA		51012	41,767
Nelson VA		51020	7,776
Nelson VA		51059	7,244
Newport News City VA		51093	28,588
Newport News City VA		51094	79,268
Newport News City VA		51095	72,863

Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties (continued):</i>			
Norfolk City VA	51079	42,660	
Norfolk City VA	51083	5,271	
Norfolk City VA	51089	80,517	
Norfolk City VA	51090	79,228	
Norfolk City VA	51100	35,127	
Pittsylvania VA	51014	20,984	
Pittsylvania VA	51016	42,522	
Portsmouth City VA	51079	37,557	
Portsmouth City VA	51080	57,978	
Prince George VA	51062	0	
Prince George VA	51063	5,713	
Prince George VA	51064	30,012	
Prince William VA	51002	45,961	
Prince William VA	51013	66,306	
Prince William VA	51031	64,109	
Prince William VA	51040	14,703	
Prince William VA	51050	42,856	
Prince William VA	51051	80,372	
Prince William VA	51052	79,290	
Prince William VA	51087	8,405	
Pulaski VA	51007	29,841	
Pulaski VA	51012	5,031	
Richmond City VA	51068	34,791	
Richmond City VA	51069	54,235	
Richmond City VA	51070	35,673	
Richmond City VA	51071	79,515	
Roanoke City VA	51011	80,132	
Roanoke City VA	51017	16,900	
Roanoke VA	51008	33,094	
Roanoke VA	51017	59,282	
Rockingham VA	51015	4,966	
Rockingham VA	51025	26,599	
Rockingham VA	51026	31,774	
Rockingham VA	51058	12,975	
Russell VA	51003	4,583	
Russell VA	51004	24,314	
Smyth VA	51005	11,877	
Smyth VA	51006	20,331	
Spotsylvania VA	51054	77,671	
Spotsylvania VA	51055	9,355	
Spotsylvania VA	51056	4,780	
Spotsylvania VA	51088	30,591	
Stafford VA	51002	33,530	
Stafford VA	51028	70,354	
Stafford VA	51088	25,077	
Suffolk City VA	51064	7,112	
Suffolk City VA	51076	77,473	
Virginia Beach City VA	51021	74,578	
Virginia Beach City VA	51081	48,000	
Virginia Beach City VA	51082	79,504	

Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties (continued):</i>			
Virginia Beach City VA		51083	75,503
Virginia Beach City VA		51084	79,655
Virginia Beach City VA		51085	80,754
Virginia Beach City VA		51100	0
Warren VA		51015	9,629
Warren VA		51018	18,267
Warren VA		51029	9,679
Washington VA		51004	26,563
Washington VA		51005	28,313
Wise VA		51001	27,786
Wise VA		51004	13,666
York VA		51091	16,680
York VA		51093	15,882
York VA		51096	32,902
<i>Split VTDs :</i>			
Albemarle VA	East Ivy	51025	1,145
Albemarle VA	East Ivy	51057	2,444
Albemarle VA	Free Bridge	51057	4,095
Albemarle VA	Free Bridge	51058	460
Amherst VA	Amelon	51023	1,337
Amherst VA	Amelon	51024	3,458
Amherst VA	Elon	51023	834
Amherst VA	Elon	51024	2,764
Arlington VA	Jefferson	51047	1,410
Arlington VA	Jefferson	51049	3,019
Arlington VA	Oakridge	51045	1,705
Arlington VA	Oakridge	51049	3,511
Augusta VA	Fishersville	51020	707
Augusta VA	Fishersville	51025	4,104
Augusta VA	White Hill	51020	1,157
Augusta VA	White Hill	51024	2,331
Bedford VA	Liberty High School	51019	838
Bedford VA	Liberty High School	51023	2,152
Bedford VA	Thaxton Elem School	51019	765
Bedford VA	Thaxton Elem School	51023	1,843
Chesapeake City VA	Bells Mill Ii	51078	546
Chesapeake City VA	Bells Mill Ii	51081	2,760
Chesterfield VA	Bailey Bridge	51027	4,061
Chesterfield VA	Bailey Bridge	51066	1,849
Chesterfield VA	Enon	51062	3,961
Chesterfield VA	Enon	51066	932
Chesterfield VA	Evergreen	51027	4,161
Chesterfield VA	Evergreen	51065	2,713
Chesterfield VA	Evergreen	51068	358
Clarke VA	Millwood	51010	1,693
Clarke VA	Millwood	51033	78
Fairfax VA	Baileys	51038	4,068
Fairfax VA	Baileys	51049	3,004
Fairfax VA	Belle Haven	51044	3,232

Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split VTDs (continued):</i>			
Fairfax VA	Belle Haven	51045	179
Fairfax VA	Belvoir	51043	3,167
Fairfax VA	Belvoir	51044	2,216
Fairfax VA	Camelot	51039	1,381
Fairfax VA	Camelot	51053	407
Fairfax VA	Flint Hill	51035	2,035
Fairfax VA	Flint Hill	51036	3,897
Fairfax VA	Franklin	51067	1,228
Fairfax VA	Franklin	51086	3,530
Fairfax VA	Hayfield	51043	658
Fairfax VA	Hayfield	51044	3,178
Fairfax VA	Huntington	51043	5,464
Fairfax VA	Huntington	51045	320
Fairfax VA	Kinross	51067	3,186
Fairfax VA	Kinross	51086	3,128
Fairfax VA	Lake Braddock	51039	388
Fairfax VA	Lake Braddock	51041	6,417
Fairfax VA	Lane	51039	3,307
Fairfax VA	Lane	51043	2,015
Fairfax VA	Lees Corner West	51067	3,177
Fairfax VA	Lees Corner West	51086	2,463
Fairfax VA	London Towne West	51037	4,019
Fairfax VA	London Towne West	51040	1,825
Fairfax VA	Lorton	51042	0
Fairfax VA	Lorton	51043	4,353
Fairfax VA	Mosby	51035	2,906
Fairfax VA	Mosby	51037	6,928
Fairfax VA	Pohick	51041	3,303
Fairfax VA	Pohick	51042	2,489
Fairfax VA	Salona	51034	1,236
Fairfax VA	Salona	51048	2,387
Fairfax VA	Stone	51037	3,052
Fairfax VA	Stone	51067	2,902
Fairfax VA	Vale	51036	907
Fairfax VA	Vale	51067	3,094
Fairfax VA	Weyanoke	51038	5,130
Fairfax VA	Weyanoke	51039	1,022
Fairfax VA	Willow Springs	51037	3,327
Fairfax VA	Willow Springs	51040	3,764
Fairfax VA	Woodson	51037	4,956
Fairfax VA	Woodson	51041	2,358
Fairfax VA	Woodyard	51040	1,101
Fairfax VA	Woodyard	51042	1,646
Frederick VA	Parkins Mill	51010	6,942
Frederick VA	Parkins Mill	51029	1,263
Fredericksburg City VA	District 4	51028	698
Fredericksburg City VA	District 4	51088	1,523
Hampton City VA	Bethel	51091	4,800
Hampton City VA	Bethel	51095	548

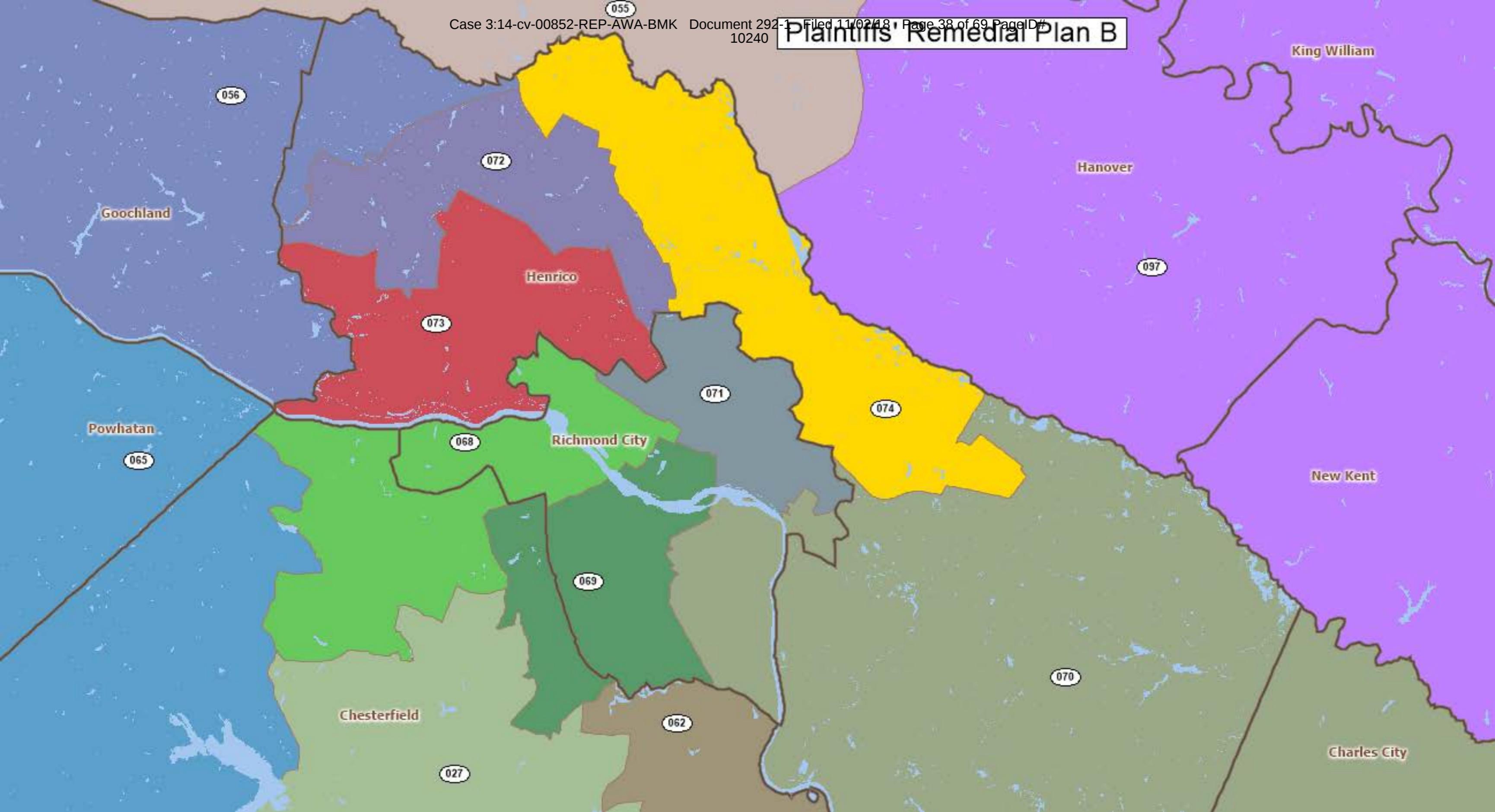
Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split VTDs (continued):</i>			
Henrico VA	Pleasants	51070	4,243
Henrico VA	Pleasants	51074	1,046
Henry VA	Axton	51014	353
Henry VA	Axton	51016	1,782
King William VA	Courthouse	51097	2,129
King William VA	Courthouse	51098	143
Loudoun VA	Belmont Ridge	51010	3,034
Loudoun VA	Belmont Ridge	51032	4,058
Loudoun VA	Countryside	51032	948
Loudoun VA	Countryside	51087	1,928
Loudoun VA	Dulles South	51067	6,329
Loudoun VA	Dulles South	51087	11
Loudoun VA	Mill Run	51032	3,722
Loudoun VA	Mill Run	51087	1,180
Loudoun VA	Park View	51086	2,336
Loudoun VA	Park View	51087	2,766
Loudoun VA	Philomont	51010	1,402
Loudoun VA	Philomont	51033	1,105
Loudoun VA	Pinebrook	51010	2,399
Loudoun VA	Pinebrook	51087	2,325
Lunenburg VA	Brown's Store	51061	1,040
Lunenburg VA	Brown's Store	51075	265
Lunenburg VA	Peoples Community Center	51061	725
Lunenburg VA	Peoples Community Center	51075	207
Lunenburg VA	Rosebud	51061	557
Lunenburg VA	Rosebud	51075	747
Lunenburg VA	Victoria Public Library	51061	1,086
Lunenburg VA	Victoria Public Library	51075	1,336
Montgomery VA	E-1	51007	10,740
Montgomery VA	E-1	51012	654
Newport News City VA	Lee Hall	51093	3,023
Newport News City VA	Lee Hall	51094	6,789
Newport News City VA	McIntosh	51093	2,317
Newport News City VA	McIntosh	51094	2,340
Norfolk City VA	Lafayette-Winona	51089	1,026
Norfolk City VA	Lafayette-Winona	51090	2,339
Portsmouth City VA	Nine	51079	2,752
Portsmouth City VA	Nine	51080	402
Prince George VA	Courts Bldg	51062	0
Prince George VA	Courts Bldg	51064	3,810
Prince George VA	Templeton	51063	1,044
Prince George VA	Templeton	51064	3,579
Prince William VA	Alvey	51040	2,244
Prince William VA	Alvey	51087	4,913
Prince William VA	Battlefield	51013	80
Prince William VA	Battlefield	51040	5,599
Prince William VA	Benton	51031	2,848
Prince William VA	Benton	51051	1,805
Prince William VA	Godwin	51031	3,710

Plan Name:	Plaintiffs' Remedial Plan A	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split VTDs (continued):</i>			
Prince William VA	Godwin	51052	4,449
Prince William VA	Henderson	51031	3,800
Prince William VA	Henderson	51052	2,700
Prince William VA	Minnieville	51031	456
Prince William VA	Minnieville	51052	4,819
Prince William VA	Stonewall	51013	5,472
Prince William VA	Stonewall	51050	1,141
Richmond City VA	707	51070	86
Richmond City VA	707	51071	5,576
Roanoke VA	Penn Forest	51008	1,911
Roanoke VA	Penn Forest	51017	417
Rockingham VA	Plains	51015	1,664
Rockingham VA	Plains	51026	1,998
Russell VA	Honaker	51003	1,463
Russell VA	Honaker	51004	2,591
Spotsylvania VA	Brokenburg	51054	1,530
Spotsylvania VA	Brokenburg	51055	1,384
Spotsylvania VA	Brokenburg	51056	1,562
Stafford VA	Hampton	51028	4,244
Stafford VA	Hampton	51088	1,168
Stafford VA	Whitson	51002	1,537
Stafford VA	Whitson	51088	3,512
Virginia Beach City VA	Aragona	51083	3,841
Virginia Beach City VA	Aragona	51085	3,439
Virginia Beach City VA	Chesapeake Beach	51083	8,310
Virginia Beach City VA	Chesapeake Beach	51100	0
Virginia Beach City VA	London Bridge	51082	4,803
Virginia Beach City VA	London Bridge	51084	763
Wise VA	East Pound	51001	1,168
Wise VA	East Pound	51004	1,416
York VA	Coventry	51091	3,668
York VA	Coventry	51093	5,134
York VA	Edgehill	51093	2,346
York VA	Edgehill	51096	2,989

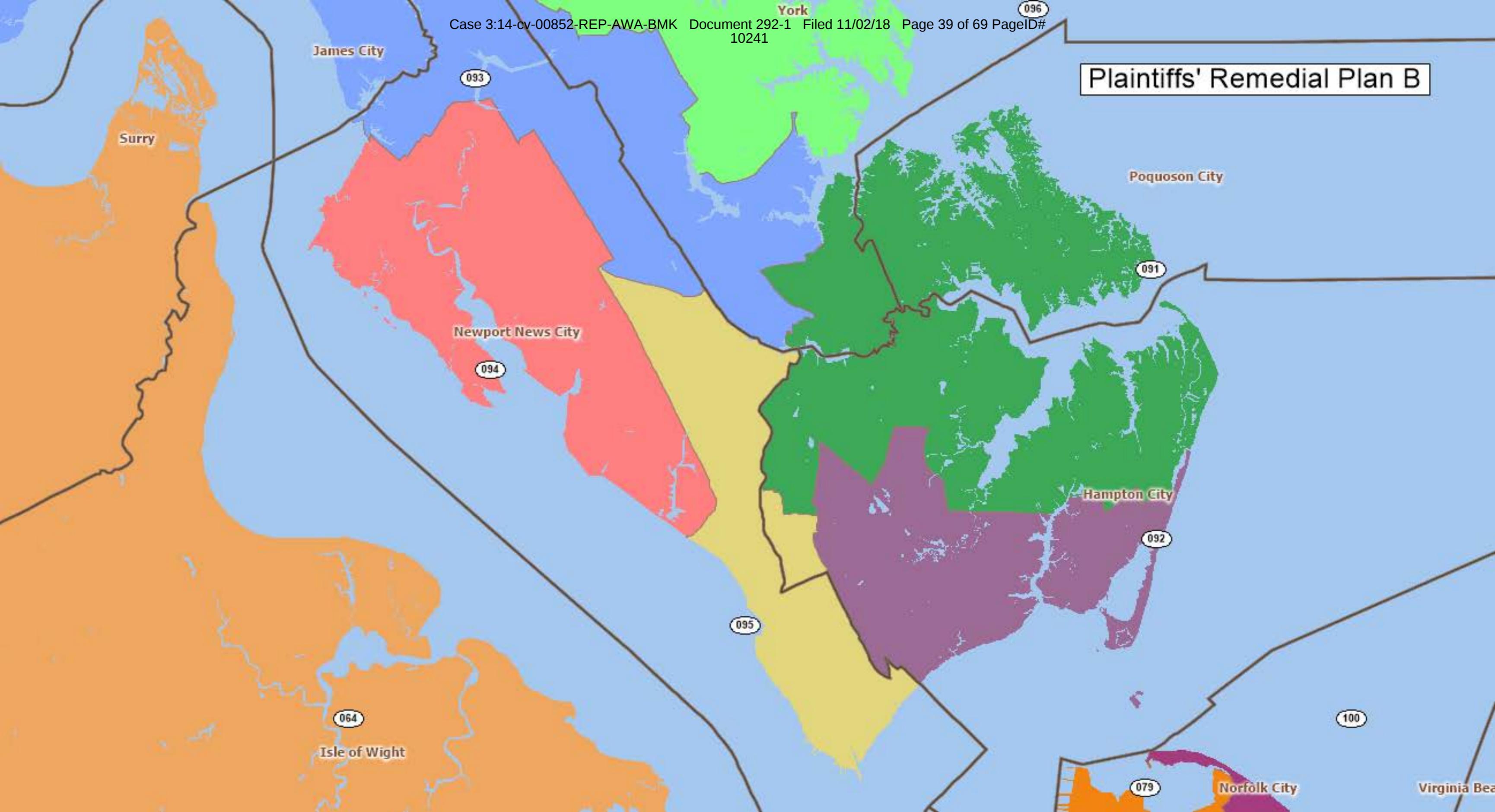
EXHIBIT F

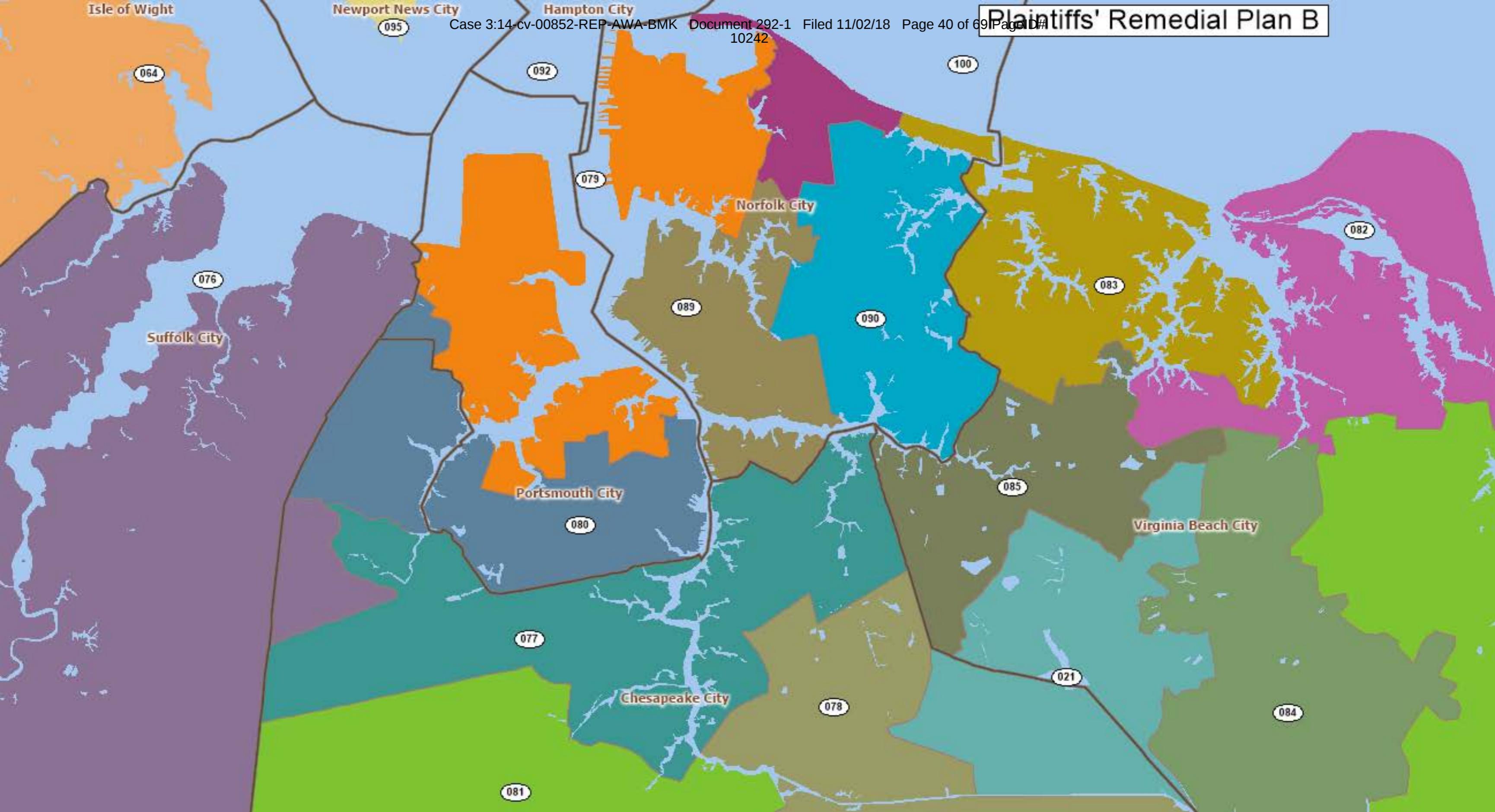
DECLARATION OF KEVIN J. HAMILTON

Plaintiffs' Remedial Plan B



Plaintiffs' Remedial Plan B





Plaintiffs' Remedial Plan B

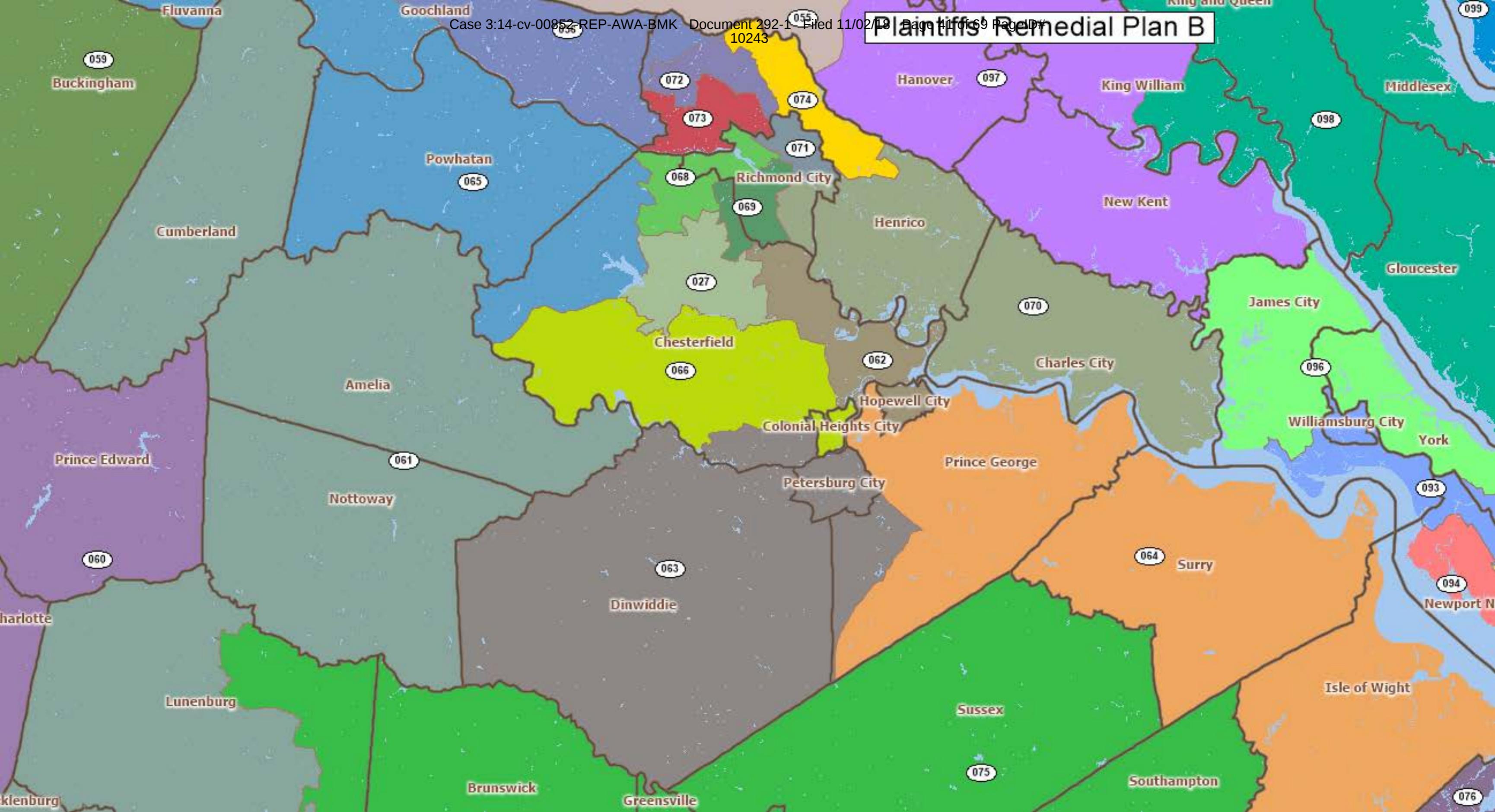
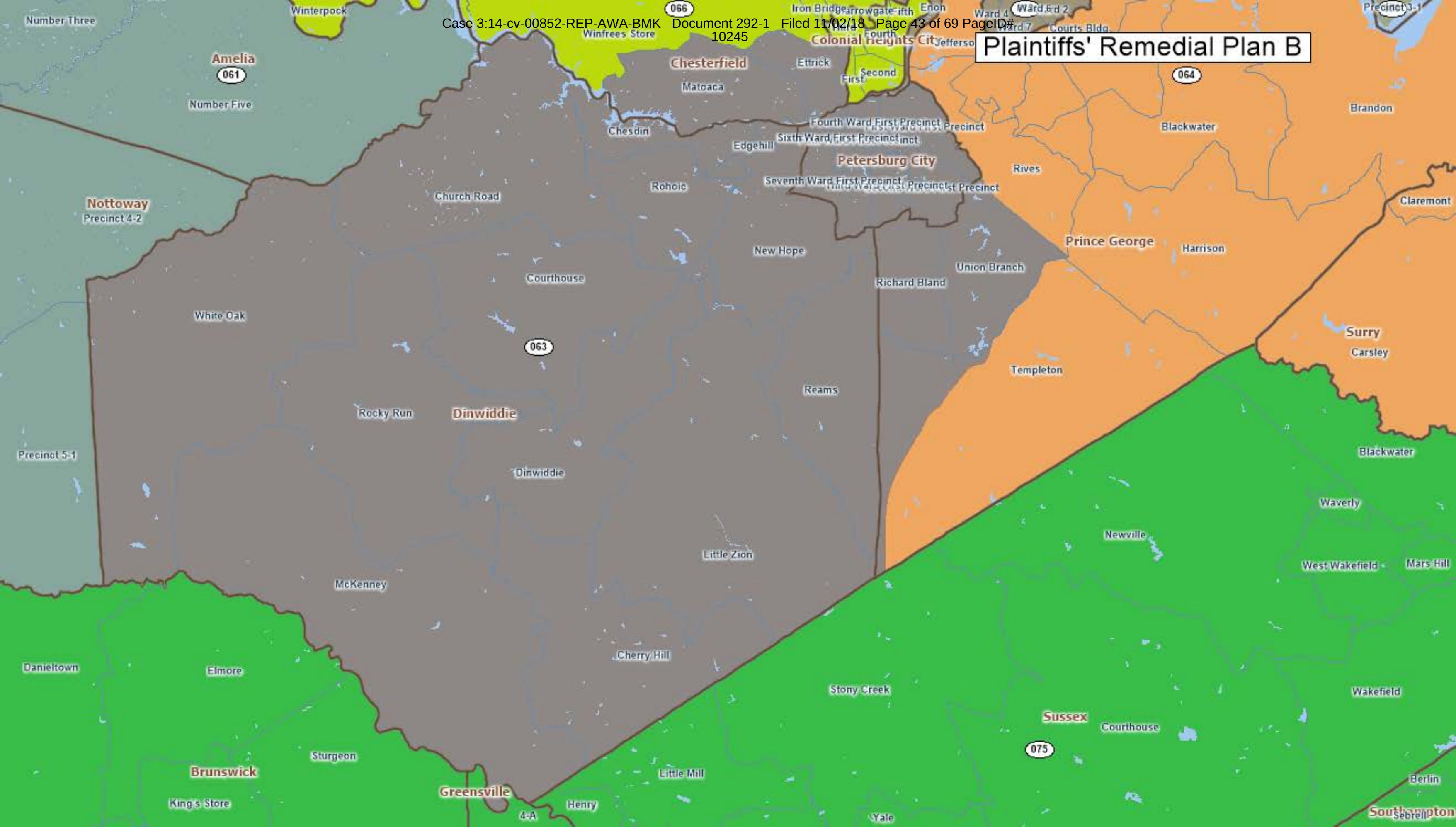
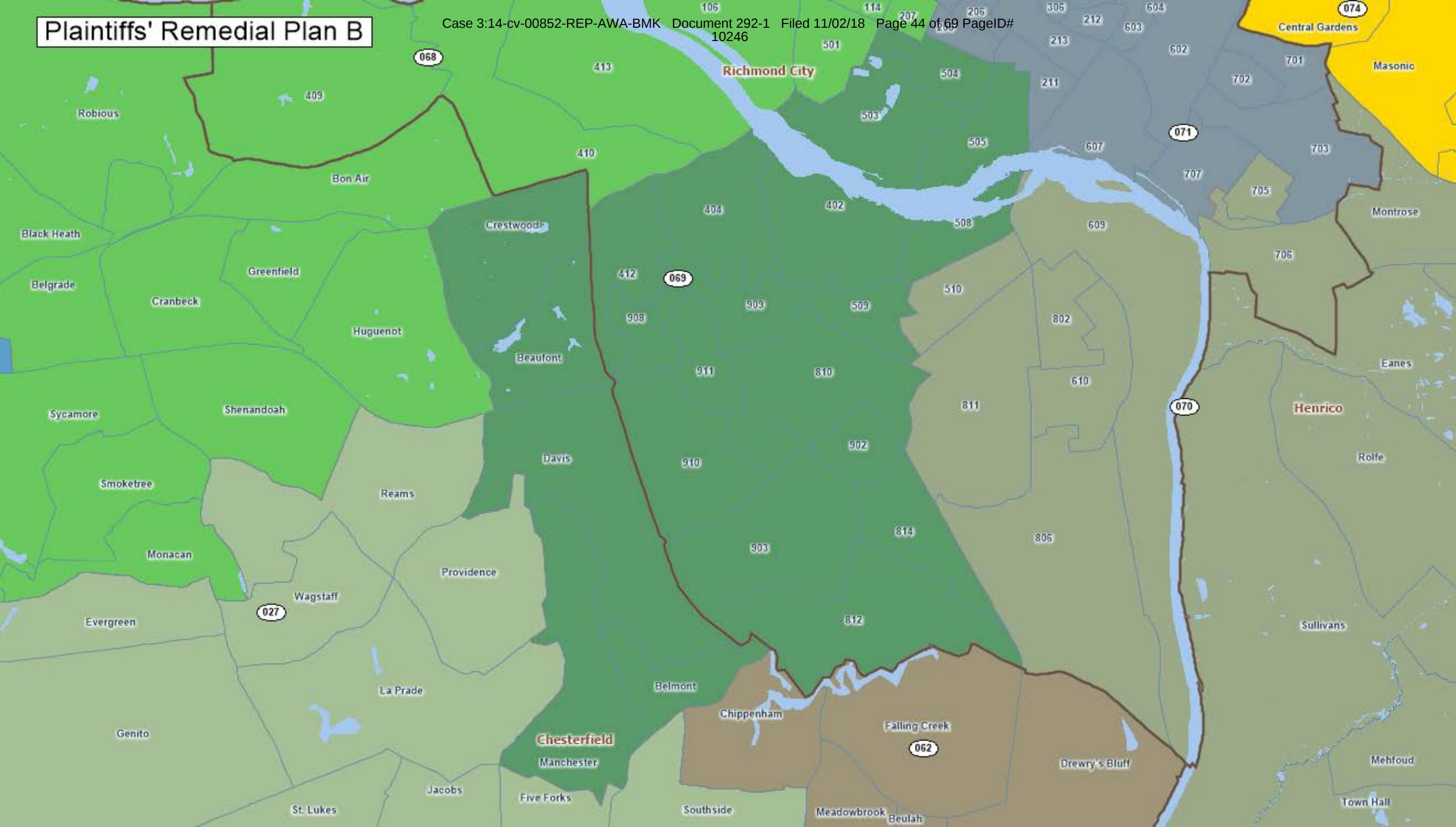


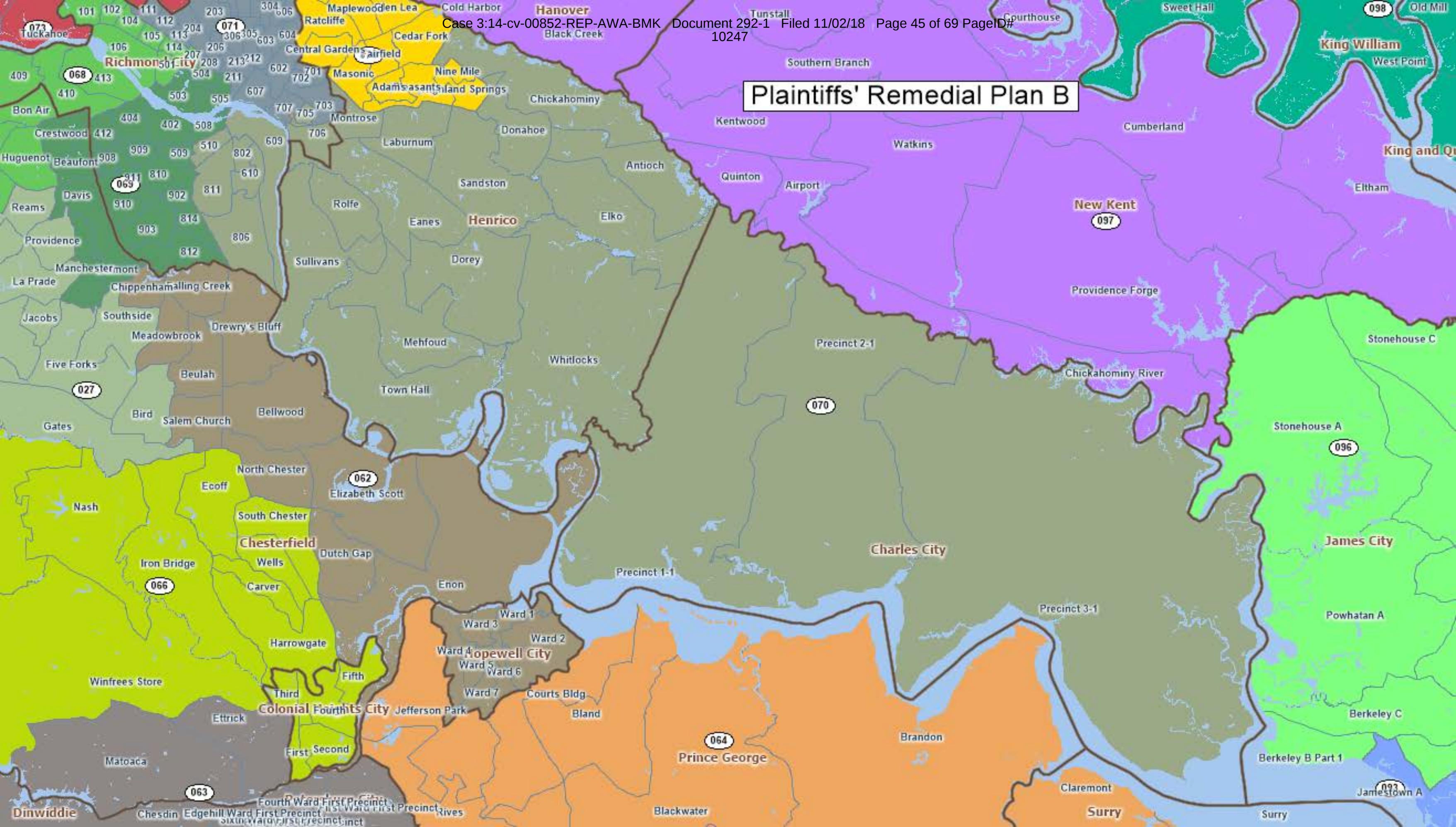
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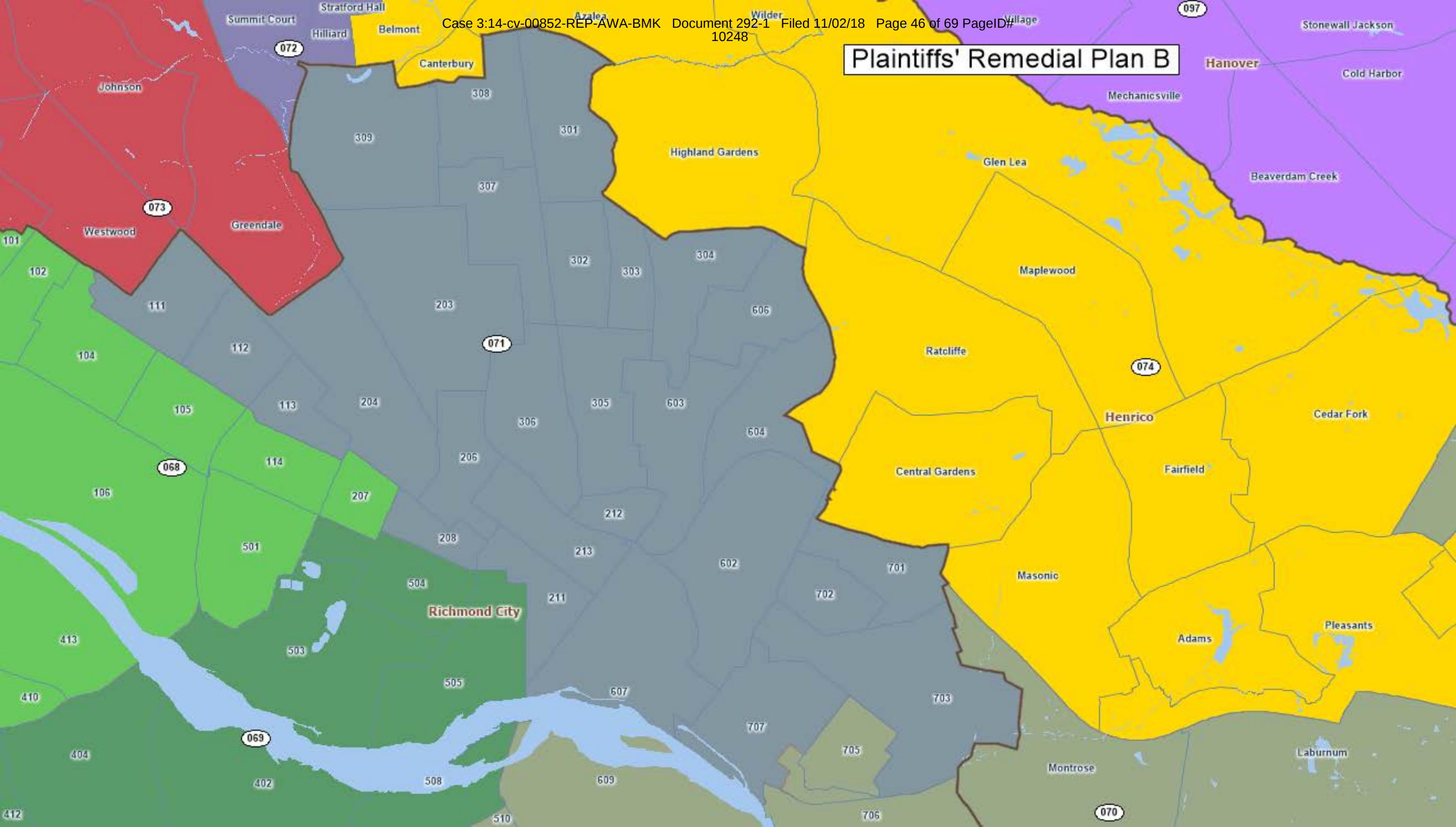
DECLARATION OF KEVIN J. HAMILTON



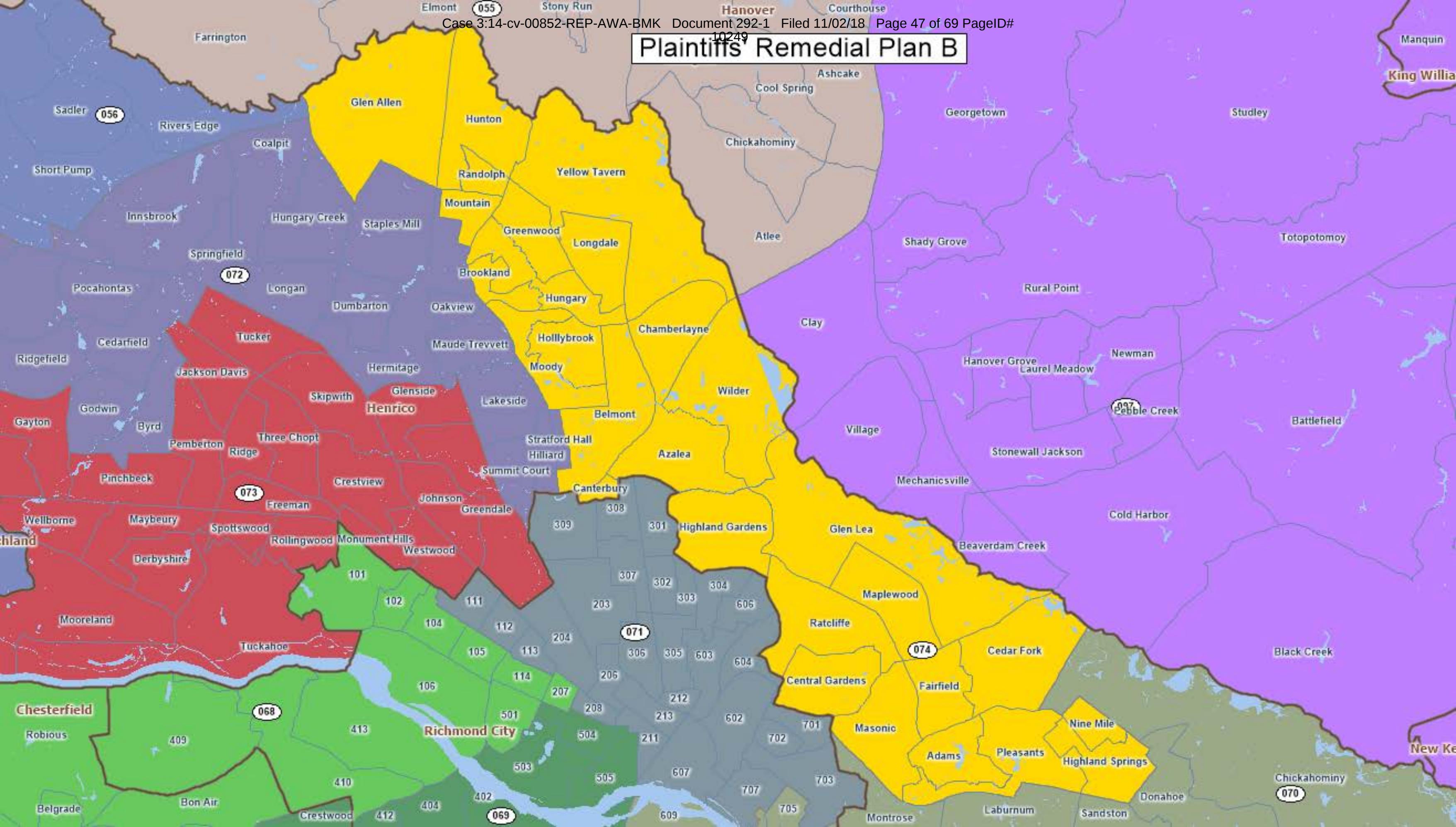
Plaintiffs' Remedial Plan B



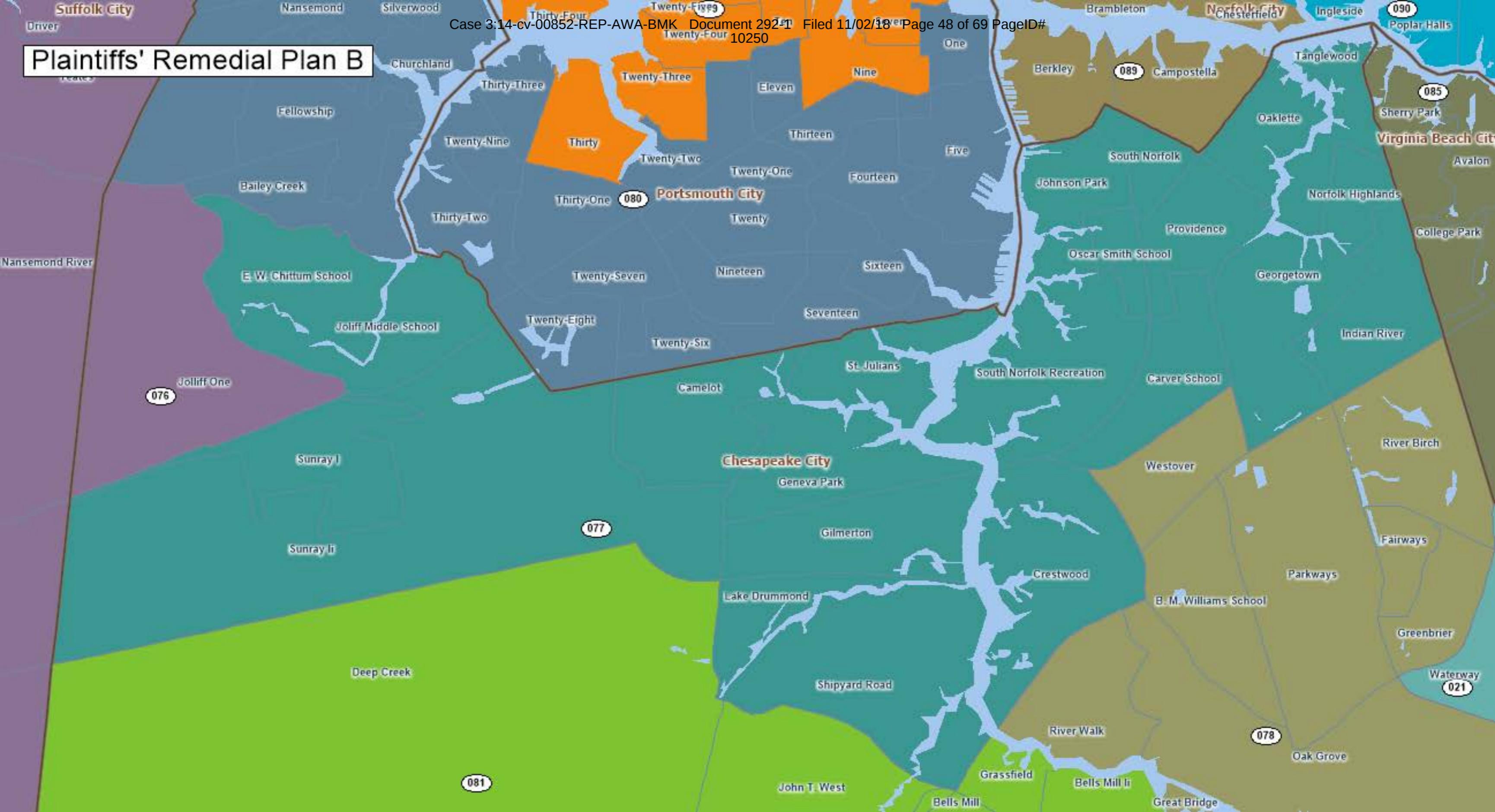




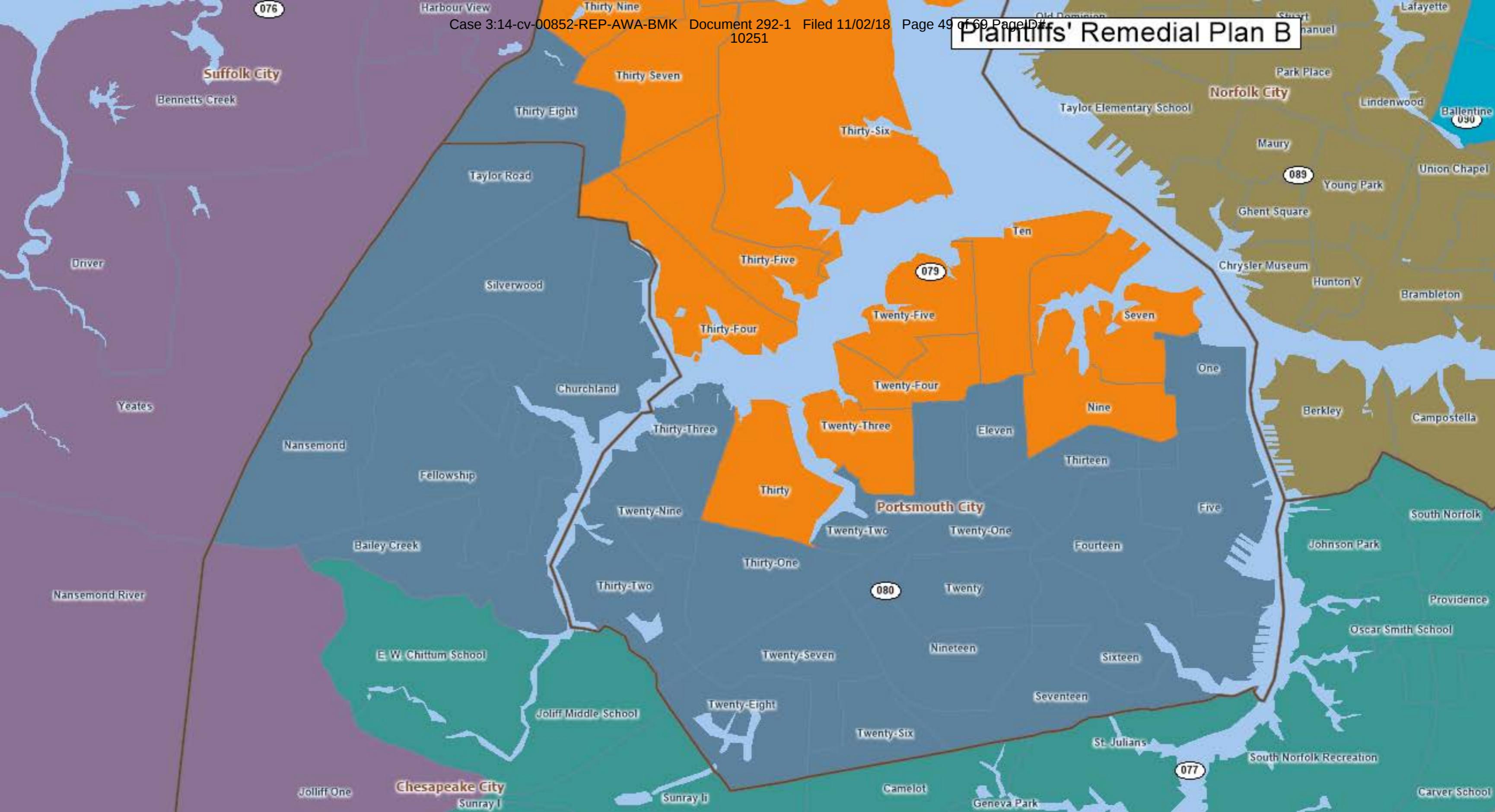
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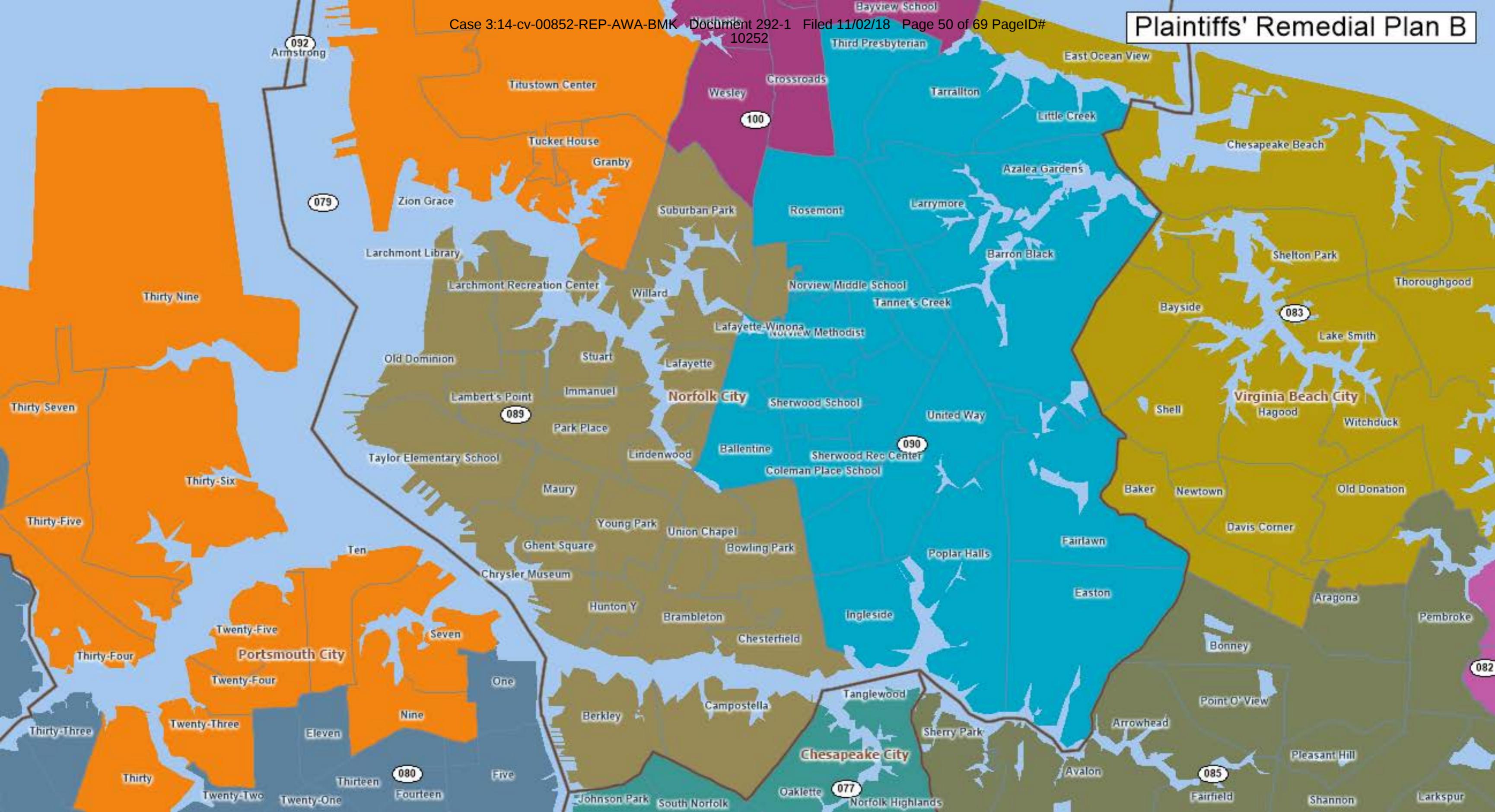
Plaintiffs' Remedial Plan B



Plaintiffs' Remedial Plan B



Plaintiffs' Remedial Plan B



Plaintiffs Remedial Plan B

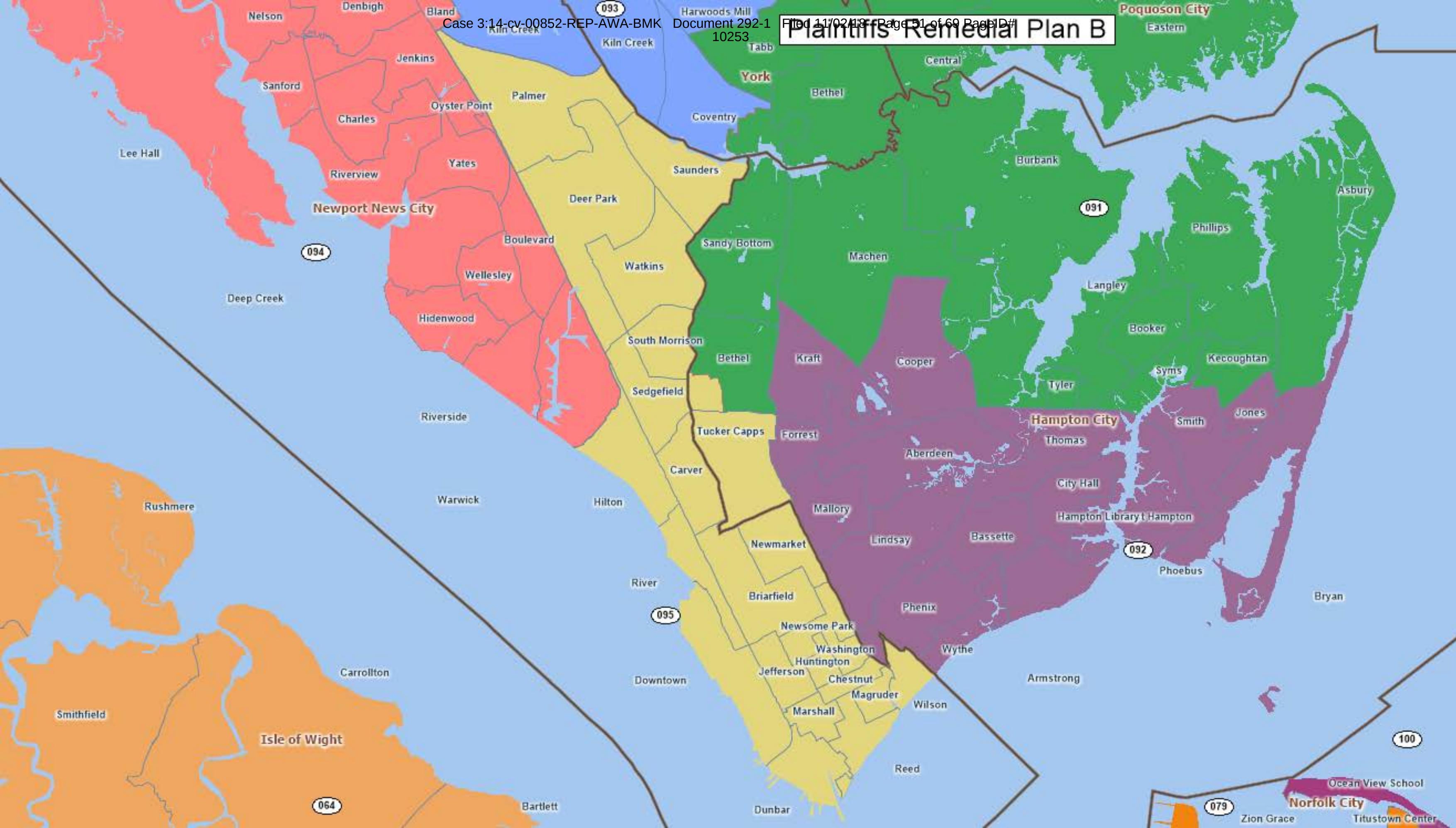


EXHIBIT H

DECLARATION OF KEVIN J. HAMILTON

51080	79,924	-86	-0.11%	32,607	40.8%	44,098	55.2%	42,761	53.5%	2,389	3.0%	336	0.4%	1,229	1.5%	102	0.1%	820	1.0%
51081	80,691	681	0.85%	60,992	75.6%	14,384	17.8%	13,174	16.3%	4,450	5.5%	298	0.4%	2,119	2.6%	96	0.1%	1,245	1.5%
51082	79,504	-506	-0.63%	64,133	80.7%	10,250	12.9%	9,023	11.3%	4,668	5.9%	309	0.4%	2,043	2.6%	98	0.1%	1,350	1.7%
51083	80,774	764	0.95%	53,040	65.7%	20,659	25.6%	19,256	23.8%	5,123	6.3%	332	0.4%	3,478	4.3%	133	0.2%	1,647	2.0%
51084	79,655	-355	-0.44%	50,866	63.9%	18,664	23.4%	17,068	21.4%	6,111	7.7%	301	0.4%	5,968	7.5%	160	0.2%	1,730	2.2%
51085	80,754	744	0.93%	52,551	65.1%	19,037	23.6%	17,489	21.7%	5,050	6.3%	378	0.5%	5,295	6.6%	117	0.1%	1,634	2.0%
51086	80,747	737	0.92%	46,400	57.5%	7,132	8.8%	6,369	7.9%	17,163	21.3%	351	0.4%	15,998	19.8%	42	0.1%	8,162	10.1%
51087	79,275	-735	-0.92%	44,093	55.6%	7,429	9.4%	6,483	8.2%	11,761	14.8%	236	0.3%	19,678	24.8%	54	0.1%	5,109	6.4%
51088	80,191	181	0.23%	60,158	75.0%	12,879	16.1%	11,480	14.3%	7,188	9.0%	261	0.3%	2,106	2.6%	95	0.1%	3,356	4.2%
51089	80,517	507	0.63%	31,318	38.9%	45,497	56.5%	44,279	55.0%	2,558	3.2%	232	0.3%	1,913	2.4%	56	0.1%	751	0.9%
51090	79,228	-782	-0.98%	33,391	42.1%	38,860	49.0%	37,049	46.8%	5,285	6.7%	341	0.4%	3,379	4.3%	114	0.1%	1,859	2.3%
51091	79,503	-507	-0.63%	51,706	65.0%	22,177	27.9%	20,508	25.8%	3,604	4.5%	332	0.4%	2,719	3.4%	94	0.1%	1,009	1.3%
51092	79,959	-51	-0.06%	27,332	34.2%	49,076	61.4%	47,056	58.9%	3,528	4.4%	347	0.4%	1,317	1.6%	82	0.1%	1,037	1.3%
51093	79,232	-778	-0.97%	53,806	67.9%	18,041	22.8%	16,524	20.9%	5,061	6.4%	268	0.3%	3,804	4.8%	137	0.2%	1,673	2.1%
51094	79,268	-742	-0.93%	45,286	57.1%	27,456	34.6%	25,249	31.9%	6,442	8.1%	389	0.5%	2,547	3.2%	159	0.2%	2,051	2.6%
51095	79,667	-343	-0.43%	32,062	40.2%	42,862	53.8%	40,935	51.4%	4,917	6.2%	367	0.5%	1,271	1.6%	81	0.1%	2,105	2.6%
51096	79,217	-793	-0.99%	62,755	79.2%	11,949	15.1%	10,948	13.8%	3,357	4.2%	266	0.3%	2,069	2.6%	78	0.1%	1,001	1.3%
51097	79,386	-624	-0.78%	67,533	85.1%	8,951	11.3%	8,379	10.6%	1,606	2.0%	597	0.8%	947	1.2%	29	0.0%	503	0.6%
51098	79,251	-759	-0.95%	63,155	79.7%	13,769	17.4%	12,959	16.4%	1,870	2.4%	403	0.5%	519	0.7%	23	0.0%	536	0.7%
51099	80,332	322	0.40%	56,801	70.7%	20,709	25.8%	19,785	24.6%	2,971	3.7%	353	0.4%	551	0.7%	27	0.0%	1,183	1.5%
51100	80,680	670	0.84%	50,700	62.8%	24,232	30.0%	23,019	28.5%	6,746	8.4%	403	0.5%	1,280	1.6%	125	0.2%	2,785	3.5%

51080	60,143	-86	-0.11%	26,160	43.5%	31,588	52.5%	31,021	51.6%	1,616	2.7%	254	0.3%	988	1.6%	73	0.1%	643	0.8%
51081	59,929	681	0.85%	46,145	77.0%	10,247	17.1%	9,827	16.4%	2,736	4.6%	247	0.3%	1,605	2.7%	75	0.1%	833	1.0%
51082	62,865	-506	-0.63%	52,024	82.8%	7,125	11.3%	6,572	10.5%	3,146	5.0%	245	0.3%	1,644	2.6%	78	0.1%	973	1.2%
51083	62,705	764	0.95%	49,306	69.1%	14,282	22.8%	13,702	21.9%	3,440	5.5%	252	0.3%	2,769	4.4%	82	0.1%	1,174	1.5%
51084	58,375	-355	-0.44%	38,245	65.5%	12,905	22.1%	12,315	21.1%	3,880	6.6%	235	0.3%	4,662	8.0%	122	0.2%	1,205	1.5%
51085	62,044	744	0.93%	42,008	67.7%	13,228	21.3%	12,636	20.4%	3,335	5.4%	294	0.4%	4,279	6.9%	102	0.1%	1,171	1.5%
51086	59,286	737	0.92%	34,944	58.9%	5,108	8.6%	4,802	8.1%	12,059	20.3%	219	0.3%	11,609	19.6%	33	0.0%	5,779	7.2%
51087	55,787	-735	-0.92%	32,124	57.6%	5,006	9.0%	4,654	8.3%	7,895	14.2%	147	0.2%	13,563	24.3%	42	0.1%	3,505	4.4%
51088	58,354	181	0.23%	45,104	77.3%	8,479	14.5%	7,991	13.7%	4,545	7.8%	197	0.2%	1,584	2.7%	78	0.1%	2,206	2.8%
51089	62,820	507	0.63%	26,850	42.7%	32,912	52.4%	32,204	51.3%	1,899	3.0%	192	0.2%	1,700	2.7%	47	0.1%	577	0.7%
51090	60,733	-782	-0.98%	27,546	45.4%	27,979	46.1%	27,252	44.9%	3,513	5.8%	273	0.3%	2,736	4.5%	92	0.1%	1,350	1.7%
51091	58,986	-507	-0.63%	39,836	67.5%	15,250	25.9%	14,558	24.7%	2,217	3.8%	229	0.3%	2,108	3.6%	74	0.1%	671	0.8%
51092	62,382	-51	-0.06%	22,724	36.4%	36,972	59.3%	35,936	57.6%	2,373	3.8%	282	0.4%	1,067	1.7%	64	0.1%	766	1.0%
51093	62,281	-778	-0.97%	44,052	70.7%	12,756	20.5%	12,119	19.5%	3,443	5.5%	217	0.3%	3,088	5.0%	101	0.1%	1,169	1.5%
51094	60,264	-742	-0.93%	36,779	61.0%	18,647	30.9%	17,735	29.4%	4,254	7.1%	305	0.4%	2,080	3.5%	117	0.1%	1,485	1.9%
51095	60,645	-343	-0.43%	26,657	44.0%	30,437	50.2%	29,594	48.8%	3,319	5.5%	283	0.4%	1,049	1.7%	61	0.1%	1,545	1.9%
51096	61,067	-793	-0.99%	49,447	81.0%	8,583	14.1%	8,227	13.5%	2,119	3.5%	192	0.2%	1,578	2.6%	57	0.1%	661	0.8%
51097	60,024	-624	-0.78%	51,473	85.8%	6,626	11.0%	6,433	10.7%	969	1.6%	451	0.6%	702	1.2%	20	0.0%	322	0.4%
51098	62,740	-759	-0.95%	50,614	80.7%	10,481	16.7%	10,201	16.3%	1,205	1.9%	322	0.4%	395	0.6%	17	0.0%	385	0.5%
51099	63,534	322	0.40%	46,161	72.7%	15,464	24.3%	15,150	23.8%	1,916	3.0%	278	0.3%	421	0.7%	22	0.0%	747	0.9%
51100	63,387	670	0.84%	41,814	66.0%	17,524	27.6%	17,066	26.9%	4,344	6.9%	322	0.4%	1,030	1.6%	104	0.1%	1,858	2.3%

EXHIBIT I

DECLARATION OF KEVIN J. HAMILTON

Plan Type:

Date: 11/2/2018

Time: 1:31:20AM

Administrator:

Measures of Compactness

11/2/2018

Sum	N/A	N/A	N/A
Min	0.16	1.23	0.09
Max	0.62	2.95	0.63
Mean	0.36	1.90	0.26
Std. Dev.	0.11	0.31	0.10

DISTRICT	Reock	Schwartzberg	Polby-Popper
51001	0.26	1.69	0.30
51002	0.30	2.17	0.18
51003	0.28	1.84	0.21
51004	0.49	1.97	0.20
51005	0.19	2.29	0.17
51006	0.27	1.82	0.26
51007	0.50	1.81	0.25
51008	0.47	1.83	0.26
51009	0.35	1.83	0.24
51010	0.23	2.16	0.18
51011	0.59	1.80	0.26
51012	0.39	1.95	0.22
51013	0.16	2.53	0.13
51014	0.24	2.34	0.16
51015	0.55	1.52	0.34
51016	0.36	2.11	0.18
51017	0.25	2.95	0.09
51018	0.62	1.92	0.24
51019	0.43	2.09	0.17
51020	0.27	2.28	0.15
51021	0.42	1.74	0.31
51022	0.20	2.59	0.11
51023	0.26	2.25	0.15
51024	0.44	1.78	0.25
51025	0.26	2.14	0.18
51026	0.46	1.57	0.36
51027	0.50	1.93	0.24
51028	0.39	1.82	0.26
51029	0.36	1.98	0.21
51030	0.53	1.49	0.36
51031	0.38	2.11	0.19
51032	0.46	1.64	0.31
51033	0.33	1.89	0.23
51034	0.24	1.91	0.22
51035	0.20	2.11	0.19
51036	0.43	1.66	0.30
51037	0.18	2.24	0.18
51038	0.62	1.44	0.45
51039	0.35	2.16	0.19
51040	0.26	2.20	0.17

DISTRICT	Reock	Schwartzberg	Polsby-Popper
51041	0.36	1.72	0.32
51042	0.35	2.09	0.20
51043	0.22	2.10	0.21
51044	0.43	1.69	0.32
51045	0.29	1.81	0.26
51046	0.52	1.28	0.55
51047	0.41	1.73	0.33
51048	0.18	2.24	0.16
51049	0.24	2.35	0.16
51050	0.46	1.62	0.34
51051	0.24	2.15	0.18
51052	0.23	1.92	0.25
51053	0.46	1.69	0.34
51054	0.47	1.89	0.25
51055	0.57	1.69	0.28
51056	0.37	1.87	0.25
51057	0.45	1.47	0.41
51058	0.32	2.11	0.19
51059	0.30	1.98	0.21
51060	0.38	1.62	0.31
51061	0.32	2.21	0.17
51062	0.30	2.52	0.12
51063	0.59	1.27	0.51
51064	0.29	2.12	0.17
51065	0.34	1.88	0.25
51066	0.31	1.79	0.27
51067	0.32	1.84	0.25
51068	0.36	1.98	0.24
51069	0.46	1.60	0.37
51070	0.30	1.78	0.20
51071	0.38	1.78	0.29
51072	0.32	1.96	0.25
51073	0.39	1.93	0.24
51074	0.21	1.93	0.22
51075	0.41	1.56	0.32
51076	0.45	1.44	0.47
51077	0.26	1.99	0.25
51078	0.44	1.74	0.32
51079	0.44	1.76	0.27
51080	0.39	1.85	0.28
51081	0.37	1.81	0.28
51082	0.55	1.47	0.45
51083	0.44	1.72	0.32
51084	0.41	1.74	0.30
51085	0.39	1.89	0.27
51086	0.35	1.98	0.25
51087	0.22	2.30	0.17
51088	0.28	2.56	0.13
51089	0.50	1.47	0.43
51090	0.48	1.44	0.46
51091	0.48	1.41	0.49
51092	0.32	1.74	0.31
51093	0.21	2.46	0.15
51094	0.48	1.23	0.63
51095	0.25	1.69	0.34
51096	0.20	2.19	0.17

DISTRICT	Reock	Schwartzberg	Polisby-Popper
51097	0.43	1.73	0.21
51098	0.28	1.78	0.26
51099	0.27	1.97	0.21
51100	0.29	1.51	0.39

EXHIBIT J

DECLARATION OF KEVIN J. HAMILTON

Plan Name: Plaintiffs' Remedial Plan B
Plan Type:
Administrator:

Political Subdivisions Split Between Districts

Friday November 2, 2018

12:13 AM

Number of subdivisions not split:

County	82
Voting District	2,291

Number of subdivisions split into more than one district:

County	52
Voting District	82

Number of subdivision splits which affect *no* population:

County	2
Voting District	3

Split Counts

County

Cases where an area is split among 2 Districts: 25
Cases where an area is split among 3 Districts: 14
Cases where an area is split among 4 Districts: 5
Cases where an area is split among 5 Districts: 2
Cases where an area is split among 6 Districts: 1
Cases where an area is split among 7 Districts: 3
Cases where an area is split among 8 Districts: 1
Cases where an area is split among 17 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 81
Cases where an area is split among 3 Districts: 1

County	Voting District	District	Population
<i>Split Counties :</i>			
Albemarle VA		51025	21,420
Albemarle VA		51057	37,303
Albemarle VA		51058	30,929
Albemarle VA		51059	9,318
Alexandria City VA		51045	59,633
Alexandria City VA		51046	80,333
Amherst VA		51023	10,678
Amherst VA		51024	21,675
Arlington VA		51045	14,388

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties</i> (continued):			
Arlington VA	51047	80,757	
Arlington VA	51048	55,008	
Arlington VA	51049	57,474	
Augusta VA	51020	24,485	
Augusta VA	51024	17,273	
Augusta VA	51025	31,992	
Bedford VA	51019	22,948	
Bedford VA	51022	28,780	
Bedford VA	51023	16,948	
Botetourt VA	51017	4,449	
Botetourt VA	51019	28,699	
Campbell VA	51022	17,154	
Campbell VA	51059	30,664	
Campbell VA	51060	7,024	
Caroline VA	51054	2,484	
Caroline VA	51055	19,742	
Caroline VA	51099	6,319	
Chesapeake City VA	51021	5,030	
Chesapeake City VA	51076	2,057	
Chesapeake City VA	51077	80,448	
Chesapeake City VA	51078	80,037	
Chesapeake City VA	51080	21,946	
Chesapeake City VA	51081	32,691	
Chesterfield VA	51027	79,675	
Chesterfield VA	51062	57,325	
Chesterfield VA	51063	13,302	
Chesterfield VA	51065	40,407	
Chesterfield VA	51066	61,986	
Chesterfield VA	51068	44,543	
Chesterfield VA	51069	18,998	
Clarke VA	51010	4,309	
Clarke VA	51033	9,725	
Culpeper VA	51018	12,895	
Culpeper VA	51030	33,794	
Fairfax VA	51034	53,301	
Fairfax VA	51035	80,213	
Fairfax VA	51036	79,746	
Fairfax VA	51037	57,690	
Fairfax VA	51038	80,758	
Fairfax VA	51039	80,710	
Fairfax VA	51040	66,026	
Fairfax VA	51041	80,792	
Fairfax VA	51042	79,964	
Fairfax VA	51043	80,750	
Fairfax VA	51044	80,796	
Fairfax VA	51045	6,219	
Fairfax VA	51048	24,484	
Fairfax VA	51049	23,135	
Fairfax VA	51053	67,717	
Fairfax VA	51067	70,636	

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties</i> (continued):			
Fairfax VA		51086	68,789
Fauquier VA		51018	40,915
Fauquier VA		51031	15,101
Fauquier VA		51088	9,187
Fluvanna VA		51058	18,460
Fluvanna VA		51065	7,231
Franklin VA		51009	46,650
Franklin VA		51022	9,509
Frederick VA		51010	13,649
Frederick VA		51029	43,969
Frederick VA		51033	20,687
Fredericksburg City VA		51028	8,950
Fredericksburg City VA		51088	15,336
Goochland VA		51056	17,530
Goochland VA		51065	4,187
Hampton City VA		51091	50,673
Hampton City VA		51092	79,959
Hampton City VA		51095	6,804
Hanover VA		51055	50,481
Hanover VA		51097	49,382
Henrico VA		51056	24,178
Henrico VA		51070	43,528
Henrico VA		51072	80,257
Henrico VA		51073	79,730
Henrico VA		51074	79,242
Henry VA		51009	15,434
Henry VA		51014	15,368
Henry VA		51016	23,349
James City VA		51093	20,694
James City VA		51096	46,315
King William VA		51097	11,575
King William VA		51098	4,360
Loudoun VA		51010	62,659
Loudoun VA		51032	80,268
Loudoun VA		51033	50,138
Loudoun VA		51034	27,421
Loudoun VA		51067	8,997
Loudoun VA		51086	11,958
Loudoun VA		51087	70,870
Lunenburg VA		51061	8,470
Lunenburg VA		51075	4,444
Lynchburg City VA		51022	23,864
Lynchburg City VA		51023	51,704
Montgomery VA		51007	35,026
Montgomery VA		51008	17,599
Montgomery VA		51012	41,767
Nelson VA		51020	7,776
Nelson VA		51059	7,244
Newport News City VA		51093	28,588
Newport News City VA		51094	79,268

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties (continued):</i>			
Newport News City VA	51095	72,863	
Norfolk City VA	51079	42,660	
Norfolk City VA	51083	5,271	
Norfolk City VA	51089	80,517	
Norfolk City VA	51090	79,228	
Norfolk City VA	51100	35,127	
Pittsylvania VA	51014	20,984	
Pittsylvania VA	51016	42,522	
Portsmouth City VA	51079	37,557	
Portsmouth City VA	51080	57,978	
Prince George VA	51062	0	
Prince George VA	51063	5,713	
Prince George VA	51064	30,012	
Prince William VA	51002	45,961	
Prince William VA	51013	66,306	
Prince William VA	51031	64,109	
Prince William VA	51040	14,703	
Prince William VA	51050	42,856	
Prince William VA	51051	80,372	
Prince William VA	51052	79,290	
Prince William VA	51087	8,405	
Pulaski VA	51007	29,841	
Pulaski VA	51012	5,031	
Richmond City VA	51068	34,791	
Richmond City VA	51069	61,342	
Richmond City VA	51070	28,566	
Richmond City VA	51071	79,515	
Roanoke City VA	51011	80,132	
Roanoke City VA	51017	16,900	
Roanoke VA	51008	33,094	
Roanoke VA	51017	59,282	
Rockingham VA	51015	4,966	
Rockingham VA	51025	26,599	
Rockingham VA	51026	31,774	
Rockingham VA	51058	12,975	
Russell VA	51003	4,583	
Russell VA	51004	24,314	
Smyth VA	51005	11,877	
Smyth VA	51006	20,331	
Spotsylvania VA	51054	77,671	
Spotsylvania VA	51055	9,355	
Spotsylvania VA	51056	4,780	
Spotsylvania VA	51088	30,591	
Stafford VA	51002	33,530	
Stafford VA	51028	70,354	
Stafford VA	51088	25,077	
Suffolk City VA	51064	7,112	
Suffolk City VA	51076	77,473	
Virginia Beach City VA	51021	74,578	
Virginia Beach City VA	51081	48,000	

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split Counties (continued):</i>			
Virginia Beach City VA		51082	79,504
Virginia Beach City VA		51083	75,503
Virginia Beach City VA		51084	79,655
Virginia Beach City VA		51085	80,754
Virginia Beach City VA		51100	0
Warren VA		51015	9,629
Warren VA		51018	18,267
Warren VA		51029	9,679
Washington VA		51004	26,563
Washington VA		51005	28,313
Wise VA		51001	27,786
Wise VA		51004	13,666
York VA		51091	16,680
York VA		51093	15,882
York VA		51096	32,902
<i>Split VTDs :</i>			
Albemarle VA	East Ivy	51025	1,145
Albemarle VA	East Ivy	51057	2,444
Albemarle VA	Free Bridge	51057	4,095
Albemarle VA	Free Bridge	51058	460
Amherst VA	Amelon	51023	1,337
Amherst VA	Amelon	51024	3,458
Amherst VA	Elon	51023	834
Amherst VA	Elon	51024	2,764
Arlington VA	Jefferson	51047	1,410
Arlington VA	Jefferson	51049	3,019
Arlington VA	Oakridge	51045	1,705
Arlington VA	Oakridge	51049	3,511
Augusta VA	Fishersville	51020	707
Augusta VA	Fishersville	51025	4,104
Augusta VA	White Hill	51020	1,157
Augusta VA	White Hill	51024	2,331
Bedford VA	Liberty High School	51019	838
Bedford VA	Liberty High School	51023	2,152
Bedford VA	Thaxton Elem School	51019	765
Bedford VA	Thaxton Elem School	51023	1,843
Chesapeake City VA	Bells Mill Ii	51078	546
Chesapeake City VA	Bells Mill Ii	51081	2,760
Chesterfield VA	Bailey Bridge	51027	4,353
Chesterfield VA	Bailey Bridge	51066	1,557
Chesterfield VA	Evergreen	51027	4,519
Chesterfield VA	Evergreen	51065	2,713
Clarke VA	Millwood	51010	1,693
Clarke VA	Millwood	51033	78
Fairfax VA	Baileys	51038	4,068
Fairfax VA	Baileys	51049	3,004
Fairfax VA	Belle Haven	51044	3,232
Fairfax VA	Belle Haven	51045	179
Fairfax VA	Belvoir	51043	3,167

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split VTDs (continued):</i>			
Fairfax VA	Belvoir	51044	2,216
Fairfax VA	Camelot	51039	1,381
Fairfax VA	Camelot	51053	407
Fairfax VA	Flint Hill	51035	2,035
Fairfax VA	Flint Hill	51036	3,897
Fairfax VA	Franklin	51067	1,228
Fairfax VA	Franklin	51086	3,530
Fairfax VA	Hayfield	51043	658
Fairfax VA	Hayfield	51044	3,178
Fairfax VA	Huntington	51043	5,464
Fairfax VA	Huntington	51045	320
Fairfax VA	Kinross	51067	3,186
Fairfax VA	Kinross	51086	3,128
Fairfax VA	Lake Braddock	51039	388
Fairfax VA	Lake Braddock	51041	6,417
Fairfax VA	Lane	51039	3,307
Fairfax VA	Lane	51043	2,015
Fairfax VA	Lees Corner West	51067	3,177
Fairfax VA	Lees Corner West	51086	2,463
Fairfax VA	London Towne West	51037	4,019
Fairfax VA	London Towne West	51040	1,825
Fairfax VA	Lorton	51042	0
Fairfax VA	Lorton	51043	4,353
Fairfax VA	Mosby	51035	2,906
Fairfax VA	Mosby	51037	6,928
Fairfax VA	Pohick	51041	3,303
Fairfax VA	Pohick	51042	2,489
Fairfax VA	Salona	51034	1,236
Fairfax VA	Salona	51048	2,387
Fairfax VA	Stone	51037	3,052
Fairfax VA	Stone	51067	2,902
Fairfax VA	Vale	51036	907
Fairfax VA	Vale	51067	3,094
Fairfax VA	Weyanoke	51038	5,130
Fairfax VA	Weyanoke	51039	1,022
Fairfax VA	Willow Springs	51037	3,327
Fairfax VA	Willow Springs	51040	3,764
Fairfax VA	Woodson	51037	4,956
Fairfax VA	Woodson	51041	2,358
Fairfax VA	Woodyard	51040	1,101
Fairfax VA	Woodyard	51042	1,646
Frederick VA	Parkins Mill	51010	6,942
Frederick VA	Parkins Mill	51029	1,263
Fredericksburg City VA	District 4	51028	698
Fredericksburg City VA	District 4	51088	1,523
Goochland VA	Hadensville	51056	715
Goochland VA	Hadensville	51065	1,621
Hampton City VA	Bethel	51091	4,800
Hampton City VA	Bethel	51095	548

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split VTDs (continued):</i>			
Henrico VA	Causeway	51056	767
Henrico VA	Causeway	51072	2,162
Henry VA	Axton	51014	353
Henry VA	Axton	51016	1,782
King William VA	Courthouse	51097	2,129
King William VA	Courthouse	51098	143
Loudoun VA	Belmont Ridge	51010	3,034
Loudoun VA	Belmont Ridge	51032	4,058
Loudoun VA	Countryside	51032	948
Loudoun VA	Countryside	51087	1,928
Loudoun VA	Dulles South	51067	6,329
Loudoun VA	Dulles South	51087	11
Loudoun VA	Mill Run	51032	3,722
Loudoun VA	Mill Run	51087	1,180
Loudoun VA	Park View	51086	2,336
Loudoun VA	Park View	51087	2,766
Loudoun VA	Philomont	51010	1,402
Loudoun VA	Philomont	51033	1,105
Loudoun VA	Pinebrook	51010	2,399
Loudoun VA	Pinebrook	51087	2,325
Lunenburg VA	Brown's Store	51061	1,040
Lunenburg VA	Brown's Store	51075	265
Lunenburg VA	Peoples Community Center	51061	725
Lunenburg VA	Peoples Community Center	51075	207
Lunenburg VA	Rosebud	51061	557
Lunenburg VA	Rosebud	51075	747
Lunenburg VA	Victoria Public Library	51061	1,086
Lunenburg VA	Victoria Public Library	51075	1,336
Montgomery VA	E-1	51007	10,740
Montgomery VA	E-1	51012	654
Newport News City VA	Lee Hall	51093	3,023
Newport News City VA	Lee Hall	51094	6,789
Newport News City VA	McIntosh	51093	2,317
Newport News City VA	McIntosh	51094	2,340
Norfolk City VA	Lafayette-Winona	51089	1,026
Norfolk City VA	Lafayette-Winona	51090	2,339
Portsmouth City VA	Nine	51079	2,752
Portsmouth City VA	Nine	51080	402
Prince George VA	Courts Bldg	51062	0
Prince George VA	Courts Bldg	51064	3,810
Prince George VA	Templeton	51063	1,044
Prince George VA	Templeton	51064	3,579
Prince William VA	Alvey	51040	2,244
Prince William VA	Alvey	51087	4,913
Prince William VA	Battlefield	51013	80
Prince William VA	Battlefield	51040	5,599
Prince William VA	Benton	51031	2,848
Prince William VA	Benton	51051	1,805
Prince William VA	Godwin	51031	3,710

Plan Name:	Plaintiffs' Remedial Plan B	Administrator:	
Plan Type:		User:	
County	Voting District	District	Population
<i>Split VTDs (continued):</i>			
Prince William VA	Godwin	51052	4,449
Prince William VA	Henderson	51031	3,800
Prince William VA	Henderson	51052	2,700
Prince William VA	Minnieville	51031	456
Prince William VA	Minnieville	51052	4,819
Prince William VA	Stonewall	51013	5,472
Prince William VA	Stonewall	51050	1,141
Richmond City VA	707	51070	86
Richmond City VA	707	51071	5,576
Roanoke VA	Penn Forest	51008	1,911
Roanoke VA	Penn Forest	51017	417
Rockingham VA	Plains	51015	1,664
Rockingham VA	Plains	51026	1,998
Russell VA	Honaker	51003	1,463
Russell VA	Honaker	51004	2,591
Spotsylvania VA	Brokenburg	51054	1,530
Spotsylvania VA	Brokenburg	51055	1,384
Spotsylvania VA	Brokenburg	51056	1,562
Stafford VA	Hampton	51028	4,244
Stafford VA	Hampton	51088	1,168
Stafford VA	Whitson	51002	1,537
Stafford VA	Whitson	51088	3,512
Virginia Beach City VA	Aragona	51083	3,841
Virginia Beach City VA	Aragona	51085	3,439
Virginia Beach City VA	Chesapeake Beach	51083	8,310
Virginia Beach City VA	Chesapeake Beach	51100	0
Virginia Beach City VA	London Bridge	51082	4,803
Virginia Beach City VA	London Bridge	51084	763
Wise VA	East Pound	51001	1,168
Wise VA	East Pound	51004	1,416
York VA	Coventry	51091	3,668
York VA	Coventry	51093	5,134
York VA	Edgehill	51093	2,346
York VA	Edgehill	51096	2,989