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

GOLDEN BETHUNE-HILL, et al.,

Plaintiffs,

v.

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

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

Defendants.

v.

VIRGINIA HOUSE OF DELEGATES, Intervenor-Defendants,

Defendants.

## PARTIES' SUBMISSION REGARDING BVAP DATA

By order dated January 10, 2019, the Court instructed the parties to "submit a chart setting out (in a form that permits easy comparison) for each challenged district and for each nonchallenged but affected district the census BVAP percentage and the DOJBVAP percentage as to the Enacted Plan, the Plaintiffs' Plan A, the NAACP plan, and the Special Master's plans parties have consulted." *See* Dkt. No. 346 at 11.

The parties have consulted and, through this submission by Plaintiffs, submit the requested data as Exhibit A to this filing. The attached Exhibit A sets out the requested BVAP calculations for any district altered in any of the specified proposals.<sup>1</sup> The parties shade the BVAP percentage of any district that is *not* altered from the enacted plan in a given proposal.

<sup>&</sup>lt;sup>1</sup> In Exhibit A, the calculation the Court refers to as "Census BVAP percentage" is denoted as "DLS BVAP."

The data in Exhibit A are voluminous and best viewed in native electronic format. In conjunction with this filing, Plaintiffs will serve the Court with a DVD containing Exhibit A in native Excel format.

Dated: January 15, 2019

By: /s/ Aria Branch

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of January, 2019, 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.

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

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