

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

PAMELA DWIGHT, et al.,

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Plaintiffs,

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CA No. 1:18cv02869-RWS

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v.

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**BRAD RAFFENSPERGER¹, in his
official capacity as Secretary of State
of the State of Georgia,**

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Defendant.

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**DEFENDANT’S RULE 26(a)(2) SUPPLEMENTAL
EXPERT DISCLOSURE**

Attached hereto as Exhibit 1, is the Supplemental Expert Disclosure of Gina H. Wright, Executive Director of the Legislative and Congressional Reapportionment Office.

¹ Brad Raffensperger was sworn in as Georgia’s Secretary of State on January 14, 2019. Pursuant to Fed. R. Civ. P. 25(d), Secretary Raffensperger is automatically substituted as the party defendant

Respectfully submitted,

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Brad Raffensperger

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2019 I filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record in this case.

/s/Cristina M. Correia
Cristina M. Correia
Senior Assistant Attorney General

Exhibit 1

SUPPLEMENTAL EXPERT DISCLOSURE OF GINA H. WRIGHT

In my January 25, 2019 report I relied on a voter registration precinct layer from the 2016 general election, because that was the most up to date information we had. My staff has now completed building the 2018 precinct boundary layer. As explained in my initial report, this precinct layer matches the 2018 precinct geography with the 2018 voter registration numbers obtained from the Secretary of State's office. Where precincts are whole, the voter registration figures are the *actual* registered voters by race. In the few instances where precincts are split, the computer program will estimate the numbers of registered voters proportionately to the voting age population, by race, in a particular census block.¹ Below are the 2018 voter registration figures for congressional districts 2 and 12, both as to the current plan and Plaintiffs' two illustrative plans.

<i>Congress12 Current Plan</i>	%Black Reg. Voters 2018
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District 2	50.37%
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District 12	31.55%
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<i>Illustrative Plan 1</i>	%Black Reg. Voters 2018
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District 2	47.71%
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District 12	49.98%
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<i>Illustrative Plan 2</i>	%Black Reg. Voters 2018
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District 2	47.82%
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District 12	49.92%
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¹ A review of precinct splits for congressional districts 2 and 12, in the current plan as well as Plaintiffs' illustrative plans above, demonstrates that none of those district configurations split more than 7 precincts (per district) in the 2018 precinct layer.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of March, 2019.


Gina Harbin Wright
Executive Director