

January 30, 2018

Pennsylvania Supreme Court
601 Commonwealth Avenue, Suite 4500
Harrisburg, PA 17120

Re: *League of Women Voters of Pennsylvania v. Commonwealth of Pennsylvania*, No. 159 MM 2017

To the Prothonotary:

Pursuant to this Court's January 26, 2018 Order, Petitioners hereby transmit the 2010 Census block equivalencies and ESRI shape files for the maps which formed the basis for the expert testimony and reports offered into evidence at trial. Specifically, Petitioners enclose block assignment files and GIS shapefiles corresponding to the 500 simulated plans in their expert Dr. Jowei Chen's Simulation Set 1 and the additional 500 simulated plans in his Simulation Set 2. Petitioners are submitting three copies of this data on separate USB drives.

Petitioners believe that the Simulation Set 2 plans are not relevant for purposes of devising a remedial plan because (i) those plans sought to avoid pairing the 19 incumbents in place as of 2011, and many of those incumbents are no longer in office or are not running for reelection in 2018; and (ii) the prior 2002 plan, which resulted in the incumbents in place as of 2011, was also intentionally gerrymandered to favor Republicans. *See Erfer v. Commonwealth*, 794 A.2d 325, 332 (Pa. 2002).

Petitioners further note that they are not transmitting the several trillion maps generated by their expert Dr. Wesley Pegden's algorithm. Dr. Pegden's algorithm took the enacted 2011 map as a starting point and made tiny random changes through a Markov Chain process. As Dr. Pegden explained at trial, the new maps generated were not meant to be alternative congressional plans but rather provided a basis for comparison to the enacted plan. Tr. 733:1-6. In addition, saving Dr. Pegden's maps in the specified format would consume dozens of billions of gigabytes of storage space.

Sincerely,



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Received in Supreme Court

JAN 31 2018

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CC: All Counsel of Record (via email with link to data)