

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

COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State,
et al.,

Defendants.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

ANNIE LOIS GRANT et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State,
et al.,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

**DECLARATION OF JONATHAN P. HAWLEY IN SUPPORT OF
PLAINTIFFS' RESPONSE TO COORDINATED ORDER**

I, Jonathan P. Hawley, hereby declare as follows:

1. I am over the age of 18 and competent to make this declaration. I am an associate with the law firm Elias Law Group LLP and am admitted to practice law in the States of Washington and California and before multiple federal courts of

appeals and district courts. I am admitted in this Court *pro hac vice* in the above-captioned matters, and I am counsel for Plaintiffs. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs' Response to Coordinated Order.

2. **Exhibit 1** to this Declaration is a true and correct copy of the second supplemental expert report of Blakeman B. Esselstyn, dated February 9, 2022.

FURTHER DECLARANT SAYETH NOUGHT

Dated: February 9, 2022

Respectfully submitted,

By: **Jonathan P. Hawley**

Jonathan P. Hawley*

ELIAS LAW GROUP LLP

1700 Seventh Avenue, Suite 2100

Seattle, Washington 98101

Phone: (206) 656-0179

Facsimile: (206) 656-0180

Email: JHawley@elias.law

Counsel for Plaintiffs

*Admitted *pro hac vice*

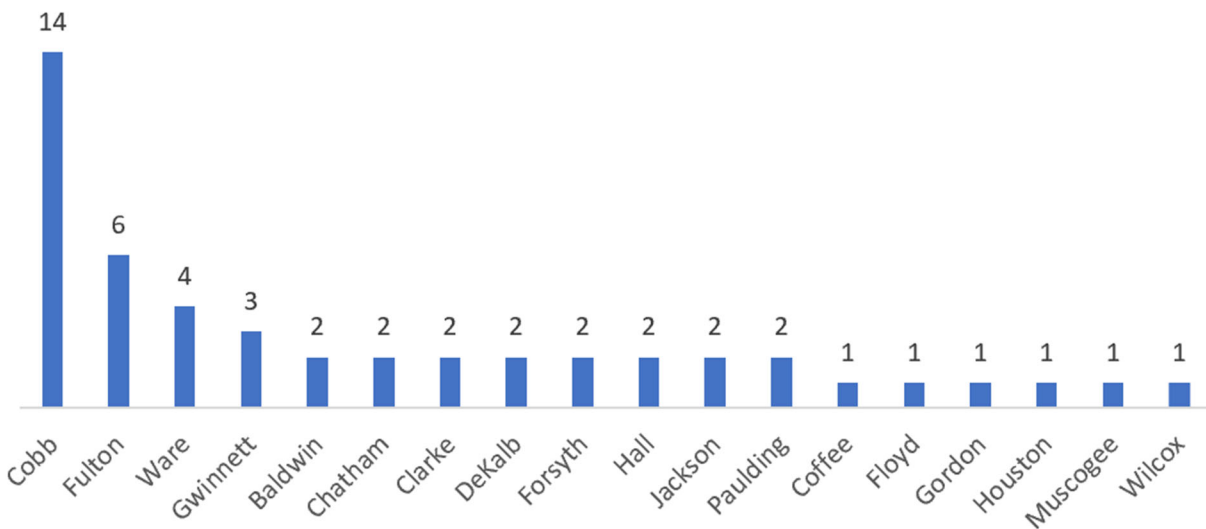
Second Supplemental Expert Report of Blakeman B. Esselstyn

1. My name is Blakeman B. Esselstyn. I am serving as an expert on redistricting and demographics for the Plaintiffs. I provided a report (“initial report”) related to the State of Georgia’s legislative redistricting plans on January 13, 2022, as well as a supplemental report on January 20, 2022, in reply to items presented by John B. Morgan in a declaration filed in this case on January 18, 2022.

2. This second supplemental report aims to provide additional information related to the testimony I gave on February 8, 2022, during the Court’s preliminary injunction hearing.

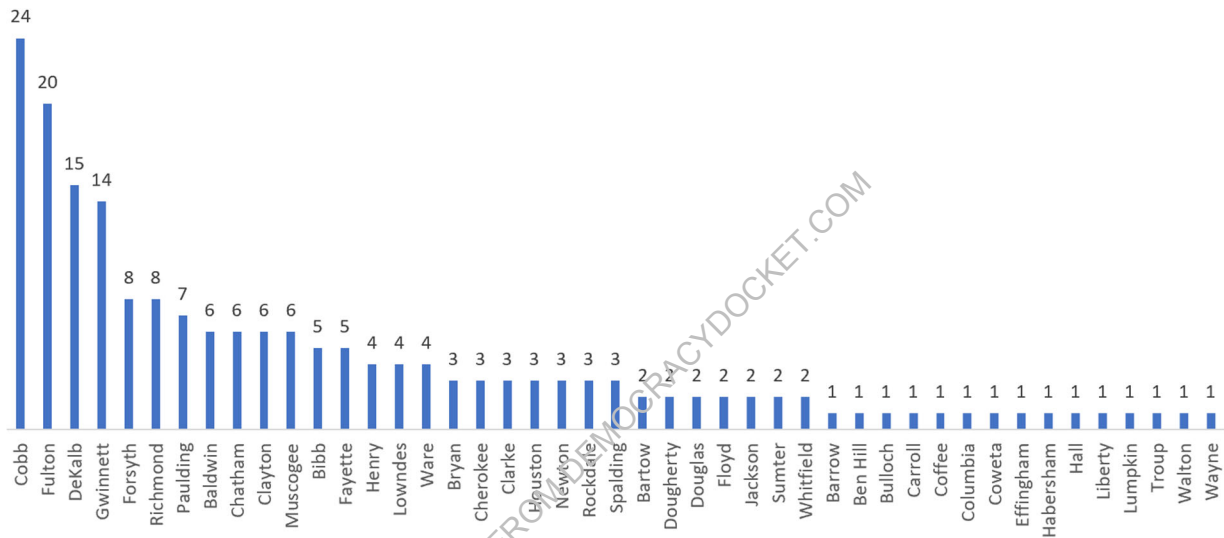
3. In my testimony, I indicated that 49 of Georgia’s 2,698 VTDs are divided in the illustrative State Senate plan (within all districts, not just those modified from the enacted plan), referencing Table 3 in my initial report. **Figure 1** shows which counties those VTD splits are in. Just 18 of the State’s 159 counties account for all of the splits.

Figure 1: VTD splits in illustrative State Senate plan by County



4. My testimony also noted that 192 out of Georgia's 2,698 VTDs are divided in the illustrative House plan (again, within all districts, not just those departing from the enacted plan), referencing Table 6 in my initial report. **Figure 2** shows which counties those VTD splits are in. Just 45 of the State's 159 counties account for all of the splits.

Figure 2: VTD splits in illustrative State House plan by County



5. Another related item mentioned in my testimony was the number of districts in each of the illustrative plans that are changed relative to the enacted plans, as well as those that are unchanged (as discussed in ¶¶ 23 and 38 of my initial report). **Figure 3** below shows the geographic locations of those 22 changed and 34 unchanged districts in the illustrative State Senate plan, and **Figure 4** below provides the comparable map for the 26 changed and 154 unchanged districts in the illustrative House plan.

Figure 3: Changed and unchanged districts in illustrative State Senate plan

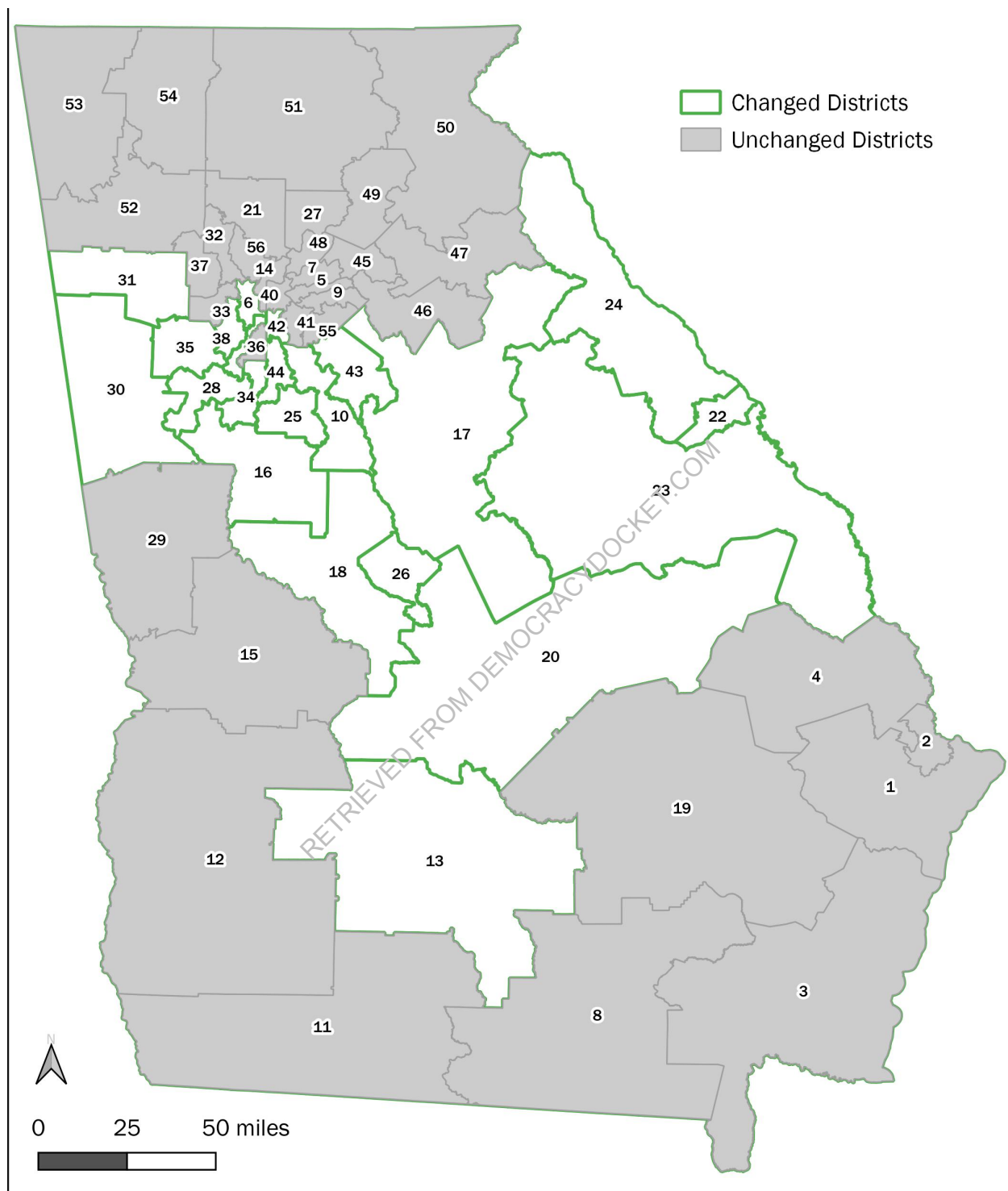
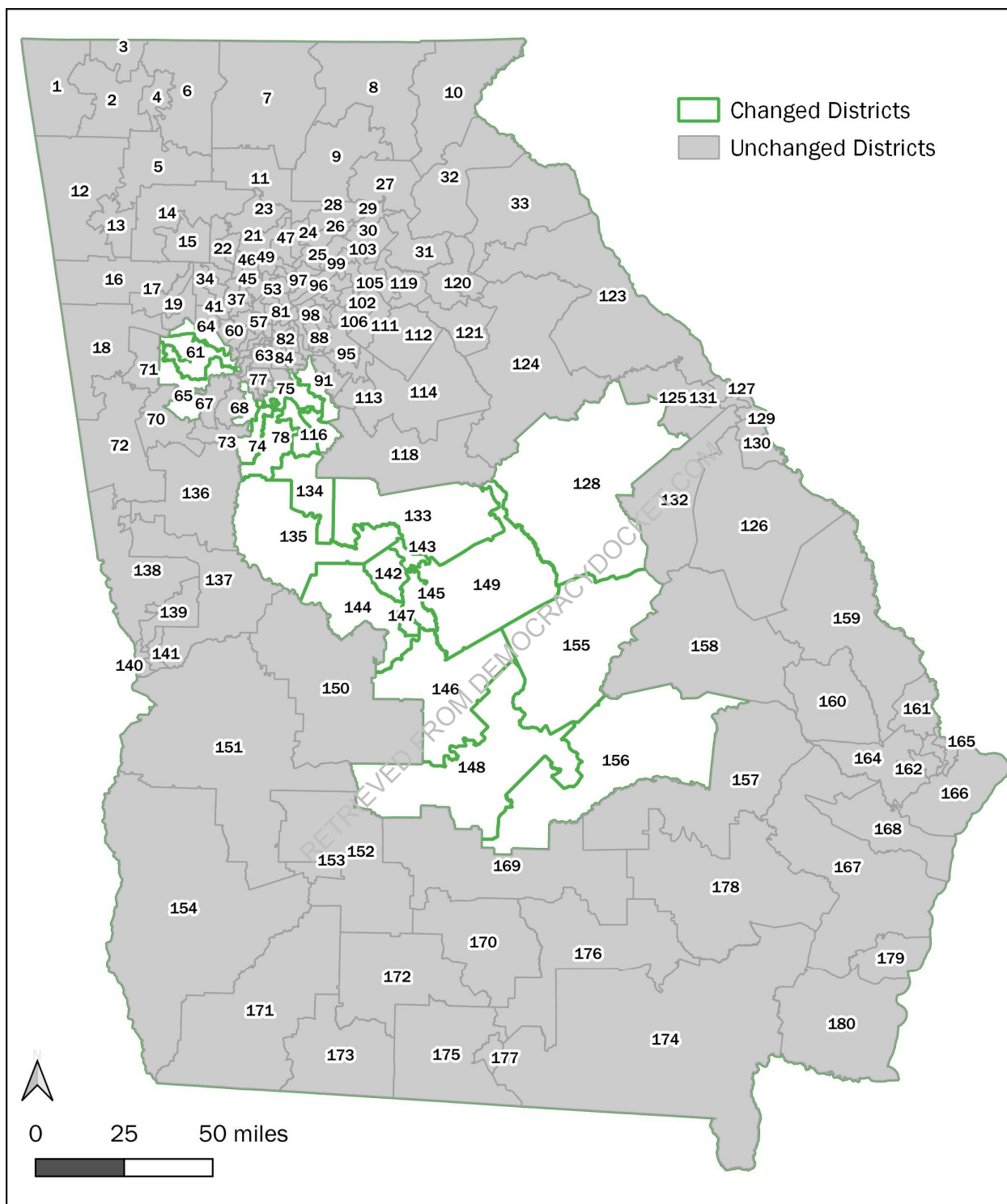


Figure 4: Changed and unchanged districts in illustrative House plan



6. I reserve the right to supplement this report in consideration of additional facts, testimony, or materials that may come to light.

Executed on February 9, 2022.

A handwritten signature in black ink, appearing to read 'Blakeman B. Esselstyn', written over a horizontal line.

Blakeman B. Esselstyn

RETRIEVED FROM DEMOCRACYDOCKET.COM