

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**THE ARKANSAS STATE  
CONFERENCE NAACP, *et al.***

**PLAINTIFFS**

v.

**Case No. 4:21-cv-1239-LPR**

**THE ARKANSAS BOARD OF  
APPORTIONMENT, *et al.***

**DEFENDANTS**

**JOINT STIPULATIONS**

1. Arkansas has a long history of official discrimination that touched upon the rights of African Americans to register, to vote, and otherwise to participate in the political process.
2. There is currently no candidate slating process in Arkansas House of Representatives elections.
3. The following members of the Arkansas House of Representatives are African-American:
  - District 5: David Fielding
  - District 16: Ken Ferguson
  - District 17: Vivian Flowers
  - District 29: Fred Love
  - District 30: Fred Allen
  - District 34: Joy Springer
  - District 36: Denise Ennett
  - District 37: Jamie Scott
  - District 48: Reginald Murdock

District 50: Milton Nicks

District 55: Monte Hodges

District 78: Jay Richardson

4. The following members of the Arkansas Senate are African-American:

District 25: Stephanie Flowers

District 30: Linda Chesterfield

District 31: Joyce Elliott

5. Democratic candidates won 24 districts in the 2018 House of Representatives elections.
6. Democratic candidates won 22 districts in the 2020 House of Representatives elections.
7. Current House District 78 has elected a black representative since 2012, which was the first election held under that district's current configuration. George McGill, who is black, won District 78 without opposition in the general election in 2012, 2014, and 2016; Jay Richardson, who is black, won District 78 without opposition in the general election in 2018 and 2020
8. The Arkansas House of Representatives is one house of the Arkansas General Assembly, which is the state legislature of the State of Arkansas. It consists of 100 members, and each member is elected by plurality vote from a single-member district in partisan elections held in November of even-numbered years. The term of office is two years.
9. The Arkansas Board of Apportionment is the state body with the duty to apportion Arkansas's state legislative districts under Article VIII of the Arkansas Constitution. The Board consists of the Governor, Secretary of State, and Attorney General of the State of Arkansas.

10. The Arkansas Constitution requires the Board of Apportionment to redraw the boundaries of state House districts following each decennial census to reflect changes in the state's population. The Board operates by majority vote, and its reapportionment plans become effective 30 days after the Board files them with the Secretary of State unless proceedings for revisions are instituted in the Arkansas Supreme Court.
11. Following the release of the 2020 Census, the Board of Apportionment adopted a reapportionment plan for the state House on November 29, 2021. It filed the plan with the Secretary of State on the same day, and it became effective on December 29, 2021.

Dated: February 1, 2022

Respectfully submitted,

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