

The Honorable Robert S. Lasnik

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

SUSAN SOTO PALMER, et al.,  
  
Plaintiffs,  
  
v.  
  
STEVEN HOBBS, et al.,  
  
Defendants.  
  
JOSE TREVINO, et al.  
  
Intervenor-Defendants.

NO. 3:22-cv-05035-RSL  
  
DEFENDANT SECRETARY OF STATE  
STEVEN HOBBS'S RESPONSE TO  
PLAINTIFFS' BRIEF IN SUPPORT OF  
REMEDIAL PROPOSALS

Secretary Hobbs takes no position on whether to adopt any of Plaintiffs' proposed remedial maps. Secretary Hobbs submits this brief for the purpose of providing information about the proposals and defers to the Court regarding whether and how the information should be utilized by the Court in selecting a remedial map. Specifically, this brief provides two pieces of information regarding each remedial map: (1) the counties affected; and (2) the districts in which incumbents would be displaced. This information was identified through an analysis performed by the Office of the Secretary of State. Decl. of Nick Pharris.

***Plaintiffs' Remedial Proposal 1***

1  
2 Plaintiffs' first remedial proposal would affect 13 counties: Adams, Benton, Chelan,  
3 Clark, Douglas, Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Pharris  
4 Decl., ¶ 5.

5 Plaintiffs' first remedial proposal would displace 8 incumbents in the following  
6 positions, Pharris Decl., ¶ 7:

7 LD 8 Representative, Position 1

8 LD 12 Senator

9 LD 14 Representative, Position 1

10 LD 14 Representative, Position 2

11 LD 14 Senator

12 LD 15 Senator

13 LD 31 Representative, Position 1

14 LD 31 Senator

***Plaintiffs' Remedial Proposal 2***

15  
16  
17 Plaintiffs' second remedial proposal would affect 11 counties: Adams, Benton, Clark,  
18 Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.

19 Plaintiffs' second remedial proposal would displace 5 incumbents in the following  
20 positions, Pharris Decl., ¶ 8:

21 LD 8 Representative, Position 1

22 LD 14 Representative, Position 1

23 LD 14 Representative, Position 2

24 LD 14 Senator

25 LD 15 Senator

***Plaintiffs' Remedial Proposal 3***

1  
2 Plaintiffs' third remedial proposal would affect 12 counties: Adams, Benton, Chelan,  
3 Clark, Douglas, Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Pharris  
4 Decl., ¶ 5.

5 Plaintiffs' third remedial proposal would displace 7 incumbents in the following  
6 positions, Pharris Decl., ¶ 9:

7 LD 8 Representative, Position 1

8 LD 12 Senator

9 LD 14 Representative, Position 1

10 LD 14 Representative, Position 2

11 LD 14 Senator

12 LD 15 Senator

13 LD 31 Senator

***Plaintiffs' Remedial Proposal 4***

14  
15  
16 Plaintiffs' fourth remedial proposal would affect 10 counties: Adams, Benton, Clark,  
17 Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.

18 Plaintiffs' fourth remedial proposal would displace 5 incumbents in the following  
19 positions, Pharris Decl., ¶ 10:

20 LD 8 Representative, Position 1

21 LD 14 Representative, Position 1

22 LD 14 Representative, Position 2

23 LD 14 Senator

24 LD 15 Senator

***Plaintiffs' Remedial Proposal 5***

1  
2 Plaintiffs' fifth remedial proposal would affect 3 counties: Benton, Klickitat, and  
3 Yakima. Pharris Decl., ¶ 5.

4 Plaintiffs' fifth remedial proposal would displace 4 incumbents in the following  
5 positions, Pharris Decl., ¶ 11:

6 LD 14 Representative, Position 1

7 LD 14 Representative, Position 2

8 LD 15 Representative, Position 1

9 LD 15 Representative, Position 2

10  
11 RESPECTFULLY SUBMITTED this 22nd day of December, 2023.

12 ROBERT W. FERGUSON  
13 *Attorney General*

14 *s/ Karl D. Smith*

KARL D. SMITH, WSBA 41988

*Deputy Solicitor General*

KATE S. WORTHINGTON, WSBA 47556

*Assistant Attorney General*

1125 Washington Street SE

PO Box 40100

Olympia, WA 98504-0100

(360) 753-6200

Karl.Smith@atg.wa.gov

Kate.Worthington@atg.wa.gov

*Attorneys for Defendant Steven Hobbs*

**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court’s CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 22nd day of December 2023, at Olympia, Washington.

*s/ Leena Vanderwood*  
Leena Vanderwood  
*Paralegal*  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 753-6200  
Leena.Vanderwood@atg.wa.gov

RETRIEVED FROM DEMOCRACYDOCKET.COM

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26