

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 MEMORANDUM
REGARDING REMEDIAL MAPS

The purpose of this memorandum and accompanying declaration is to provide this Court with technical information related to proposed Remedial Map 3A. Specifically, the attached declaration identifies 18 instances where the proposed map creates "trapped polygons," which are areas caught between county boundaries, congressional district lines, legislative district lines, county council or commissioner district lines, and city or town limits. While the declaration identifies possible remedies to the issues of trapped polygons, these would be very minor adjustments. In ten instances, the changes would affect zero people. Each of the remaining instances would affect between 2 and 17 people.

1 This is not intended to be an expert report. Instead, this is the type of information that the
2 Secretary provided to the Legislature after the Redistricting Commission submitted its
3 congressional and legislative district maps. This information is solely intended to assist the Court
4 and the expert retained to assist the Court.

5 RESPECTFULLY SUBMITTED this 23rd day of February, 2024.

6 ROBERT W. FERGUSON
7 *Attorney General*

8 *s/ Karl D. Smith*
9 KARL D. SMITH, WSBA 41988
10 *Deputy Solicitor General*
11 KATE S. WORTHINGTON, WSBA 47556
12 *Assistant Attorney General*
13 1125 Washington Street SE
14 PO Box 40100
15 Olympia, WA 98504-0100
16 (360) 753-6200
17 Karl.Smith@atg.wa.gov
18 Kate.Worthington@atg.wa.gov

19 *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 23rd day of February 2024, 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