

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT,  
IN AND FOR LEON COUNTY, FLORIDA

BLACK VOTERS MATTER CAPACITY  
BUILDING INSTITUTE, INC., et al.,

Plaintiffs,

v.

LAUREL M. LEE, in her official capacity as  
Florida Secretary of State, et al.,

Defendants.

Case No. 2022-ca-000666

**PLAINTIFFS' NOTICE OF FILING AFFIDAVIT IN SUPPORT OF  
PLAINTIFFS' EMERGENCY MOTION TO VACATE STAY PENDING APPEAL**

Plaintiffs hereby give notice of the filing the Affidavit of Dr. Stephen Ansolabehere in support of Plaintiffs' Emergency Motion to Vacate Stay Pending Appeal.

Dated: May 16, 2022

Respectfully submitted,

/s/ Frederick S. Wermuth

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 16, 2022 I electronically filed the foregoing using the State of Florida ePortal Filing System, which will serve an electronic copy to counsel in the Service List below.

/s/ Frederick S. Wermuth

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Case No. 2022-ca-000666

**AFFIDAVIT OF DR. STEPHEN ANSOLABEHERE**

STATE OF MASSACHUSETTS  
COUNTY OF SUFFOLK

BEFORE ME, the undersigned authority, personally appeared Stephen Ansolabehere, who, after first being duly sworn, deposes and says:

1. I was retained by Plaintiffs in *Black Voters Matter Capacity Building Inst., Inc. et al. v. Lee et al.*
2. This afternoon, I evaluated the Secretary's opposition to Plaintiffs' motion to vacate the automatic stay and Dr. Johnson's corresponding affidavit.
3. Dr. Johnson flags several Census blocks in his analysis which he says have been moved. All of them are zero population blocks, whose assignment to CDs do not affect the representation of any person in the state of Florida.
4. Dr. Johnson flags two points where he believes there may be discontinuities or non-contiguous areas in the map. The first concerns Interstate 95 in St. Johns County. Census Blocks 12109212901008, 121090212091009, and 121090212091010 correspond to Interstate 95. Each of these blocks has zero population. I performed integrity checks for

discontinuities in CD boundaries and non-contiguous blocks. I found none in the entire map, which, of course, includes St. Johns County. When I prepared Corrected Map A, I fixed the line that Dr. Johnson has highlighted. It corresponds to I-95 and has zero population. The assignment of the 3 Census Blocks corresponding to I-95 in this area of the map is of no consequence to the representation of any population because these are zero population blocks.

5. As Plaintiffs' counsel explained to the court last week, I originally assigned these zero population blocks to CD-4. Assigning them to CD-6 would make the map more compact, and that is my recommendation.
6. Second, Dr. Johnson highlights a black dot in CD-3 in the PDF version of Map A. I do not know what that dot is. I have inspected that area in my software and do not see a non-contiguous area or block. I have run further integrity checks and have found no non-contiguous areas. I have further checked to make sure that all Census Blocks are assigned to CDs.
7. In Paragraphs 15, 16, and 17, Dr. Johnson notes three census blocks that are in different districts in Map A than under the Enacted Map. Each of these Census blocks, as he indicates, have zero population. The three Census Blocks are 120830010031087, 120860141001018, and 121050157024030. They correspond to a river border, the lanes of a highway, and an irrigation canal. They are on the border between districts and are road or waterways. Because they have no population and because they border districts, their assignment is of no consequence in the map. Should the Court have any concern, they can be easily assigned back to the same CDs as assigned in the Enacted Map.
8. If called to testify under oath, my testimony would be consistent with this affidavit.

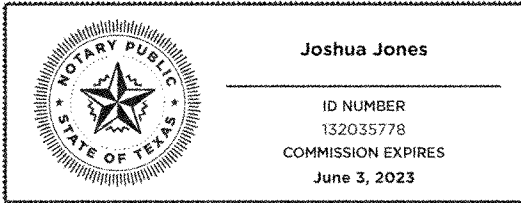
FURTHER AFFIANT SAYETH NOT.

Stephen Daniel Ansolabehere

Stephen Ansolabehere

Texas, Harris County

SWORN TO AND SUBSCRIBED before me this 16th day of May 2022, by Stephen Daniel Ansolabehere, who (check one)  is personally known to me,  produced a driver's license (issued by a state of the United States within the last five (5) years) as identification, or  produced other identification, to wit: DRIVER LICENSE



Joshua Jones  
 Print Name: Joshua Jones  
 Notary Public, State of ~~Massachusetts~~ Texas  
 Commission No.: 132035778  
 My Commission Expires: 06/03/2023

Notarized online using audio-video communication

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