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CLERK OF WISCONSIN
SUPREME COURT

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January 16, 2024

Via Hand Delivery and Electronic Filing

Samuel A. Christensen
Clerk of the Supreme Court and Court of Appeals
110 East Main Street, Suite 215
Madison, WI 53701

Re: Clarke v. WEC, Case No. 2023AP1399-OA

Dear Clerk Christensen:

I represent the Democratic Senator Respondents in the above-captioned action (Senators Carpenter, Larson, Spreitzer, Hesselbein and Smith). On Friday, January 12, 2024, via the electronic filing system, we filed our Brief in Support of Senators Carpenter, Larson, Spreitzer, Hesselbein, and Smith's Proposed Remedial Map ("Brief"), and the Expert Report of Kenneth R. Mayer, Ph.D. in Support of Remedial Maps Proposed by the Democratic Senator Respondents ("Mayer Report").

We have identified an inadvertent error in Dr. Mayer's report with some of the partisan metrics for the proposed Assembly and Senate plans. We therefore this morning have filed via the electronic filing system a CORRECTED Brief and CORRECTED Expert Report. The corrections in both documents are only as to those metrics, which are reflected in Tables 5, A7 and A8 of the Mayer Report and discussed in both documents.

Under cover of this letter, we are hand delivering the following:

- 8 copies of the (original) Brief;
- 8 copies of the (original) Mayer Report;
- 8 copies of the CORRECTED Brief;
- 8 copies of the CORRECTED Mayer Report;
- A green "Pines Bach" jump drive containing:
 - PDF of the Brief
 - PDF of the Mayer Report

Clerk Samuel A. Christensen

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- Dem Senator Resp Plan_BlockList.csv
- Folder of Dem Senator Resp Senate Shapefiles
- Folder of Dem Senator Resp Assembly Shapefiles

Electronic copies of the contents of the jump drive have already served on all counsel of record via email with a sharefile link, by agreement among counsel. We have also sent by overnight delivery to each of Dr. Bernard Grofman and Dr. Jonathan Cervas hard copies of the January 12, 2023 electronic filings and a copy of the above-described jump drive; delivery is expected today. Per the Technical Specifications Memo, we have also emailed copies of all of these items to Drs. Grofman and Cervas, and included with the transmittal email links to our proposed remedial plan hosted on Dave's Redistricting App. (See below.)

I have also emailed the CORRECTED Brief and CORRECTED Mayer Report to Drs. Grofman and Cervas, all counsel of record, and your office at clerk@wicourts.gov.

Finally, Drs. Grofman and Cervas encouraged the parties to provide links to their proposed remedial plans hosted on Dave's Redistricting App. They are below:

Democratic Senator Respondents Plan – Assembly:

<https://davesredistricting.org/maps#viewmap::baeb2b07-6744-4119-b47b-4f9bae7401d4>

Democratic Senator Respondents Plan – Senate:

<https://davesredistricting.org/maps#viewmap::70e4608b-f999-4322-8c82-4ac385b11267>

If you have any trouble with the electronic files or plan links, please let me know as soon as possible so that we can remedy the problem.

Thank you for your attention to this matter.

Sincerely,

PINES BACH LLP

By: Electronically Signed by Tamara B. Packard

Tamara B. Packard

TBP:mkj
enclosures