NEWMAN FERRARA LLP
1250 Broadway, 27th Fl., New York, NY 10001
tel. 212-619-5400 • fax 212-619-3090
www.nfllp.com

March 1, 2012

Via ECF
Magistrate Judge Roanne L. Mann
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Favors, et al. v. Cuomo, et al.
11-cv-05632-DLI-RR-GEL (RLM)

Dear Judge Mann:

We represent Intervenor-Plaintiffs Drayton, Ellis, Forrest, Johnson, Woolley, and Wright in the above referenced matter.

We write to seek clarification of the nature of the hearing scheduled for March 5, 2012, regarding the submissions of Congressional reapportionment plans by the parties and the public. It is our understanding that the purpose of the hearing is for the Court to receive comments from the parties regarding the proposals submitted by the parties and the public. In that regard, we would request the opportunity to present expert testimony by Dr. Andrew Beveridge of his analyses of the plans submitted by the parties, the public and Common Cause. We believe that such testimony will be helpful to the Court in the development of a plan for the reapportionment of the New York Congressional districts and in making its determination as to which, if any, of the plans submitted are most consistent with the constitutional and statutory requirements governing reapportionment of Congress.

We thank you for your consideration of our request.

Respectfully submitted,

NEWMAN FERARRA LLP

By: /s Randolph M. McLaughlin

Co-Counsel for Intervenor-Plaintiffs Drayton *et al*.

cc: Counsel for all parties – *via ECF*