



## Center for Law and Social Justice

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March 14, 2012

### VIA ECF

The Honorable Reena Raggi  
United States Court of Appeals for the  
Second Circuit  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

The Honorable Gerald E. Lynch  
United States Court of Appeals for the  
Second Circuit  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

The Honorable Dora L. Irizarry  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Favors v Cuomo  
11. Civ. 5632  
(RR) (GEL) (DLI)**

Dear Judge Raggi, Judge Lynch and Judge Irizarry:

Pursuant to the Court's Order, dated March 12, 2012, Plaintiffs-Intervenors Donna Drayton et al., by their undersigned counsel, submit this letter in response to Magistrate Judge Roanne L. Mann's Report and Recommendation.

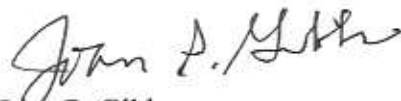
Plaintiffs-Intervenors have no major objections to the Magistrate Judge Mann's Report and Recommendation. The congressional maps proposed by Judge Mann and the Court's expert, Dr. Nathaniel Persily, substantially comply with this Court's order, dated February 28, 2012, directing the Magistrate to draw congressional districts that "are substantially equal in population...[and] ensure that the districts are compact, contiguous, respect political

subdivisions, and preserve communities of interest ...” Further, Plaintiffs-Intervenors Donna Drayton et al. appreciate the near Herculean task that was accomplished by Magistrate Judge Roanne L. Mann and the Court’s expert, Dr. Nathaniel Persily, in preparing the Report and Recommendation within the pressing time constraints.

Plaintiffs-Intervenors are particularly supportive of the congressional districts that were drawn that are consistent with or similar to those proposed in the Unity Map presented by Plaintiffs-Intervenors Drayton et al., Plaintiffs-Intervenors Lee et al. and, with certain modifications, the Ramos Intervenors. Plaintiffs-Intervenors are also appreciative of the Magistrate Judge and Dr. Persily’s incorporation of certain suggested changes urged by them in their response to the Court’s order, dated March 5, 2012, directing the parties to show cause as to why the draft redistricting plan prepared by the Court should not be presented to the Three-Judge Panel as the recommendation of the Court. Doc. 189.

Plaintiffs-Intervenors’ sole objection to the Report and Recommendation is its inclusion of Greenpoint and East-Central Williamsburg in proposed congressional district (“CD”) 12, rather than proposed CD 7. Plaintiffs-Intervenors agree with the Ramos intervenors that Greenpoint and East-Central Williamsburg are distinctly different in social and economic character from the new CD 12 which, consists of Manhattan’s Upper East Side, Yorkville, Mid-Manhattan, Gramercy Park, Astoria, and Roosevelt Island. Historically, Greenpoint and East-Central Williamsburg have been located in current CD 12, along with the similar predominately working class communities of the Lower East Side, Chinatown and Sunset Park and should continue to be placed with those communities within the proposed CD 7.

Respectfully submitted,



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