## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

MARK A. FAVORS, et al.	)
Plaintiffs,	) )
v.	) Case: 1:11-cv-05632-DLI-RR-GEL
ANDREW M. CUOMO, et al.	) ) )
Defendants.	) ) )

## **DECLARATION OF TODD R. GEREMIA**

Todd R. Geremia declares pursuant to 28 U.S.C. Section 1746:

- 1. I am a partner at Jones Day, which represents the Senate Majority Defendants—New York State Senators Dean G. Skelos and Michael F. Nozzolio, and LATFOR member Welquis R. Lopez—in the above-captioned action. I submit this declaration in support of the Senate Majority's Response to the Court's April 20 Order.
- 2. Attached hereto as Exhibit A is a true and correct copy of the Declaration of Debra A. Levine-Schellace.
- 3. Attached hereto as Exhibit B is a true and correct copy of New York Legislative Law § 83-m, Legislative Task Force on Demographic Research and Reapportionment.
- 4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the transcript of the Telephone Conference held on September 3, 2003, from *Rodriguez v. Pataki*, No. 02-cv-618-RMB (S.D.N.Y.).

- 5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the transcript of the Telephone Conference held on September 11, 2003, from *Rodriguez v. Pataki*, 02-cv-618- JMW-RMB-JGH (S.D.N.Y.).
- 6. Attached hereto as Exhibit E is a true and correct copy of an Order from *Backus v*. *South Carolina*, No. 3:11-cv-03120-HFF-MBS-PMD (D.S.C. February 8, 2012).
- 7. Attached hereto as Exhibit F is a true and correct copy of the Department of Justice letter preclearing the New York State Senate Plan, dated April 27, 2012.
- 8. Attached hereto as Exhibit G is a true and correct copy of the Joint and Consolidated Amended Complaint from *Rodriguez v. Pataki*, No. 02-cv-618- JMW-RMB-JGH (S.D.N.Y. January 24, 2003).

I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Todd R. Geremia

Todd R. Geremia

New York, NY April 27, 2012