## 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 Defendants' Second Response to the Court's April 20 Order.
- 2. Attached hereto as Exhibit A is a true and correct copy of a May 9, 2002 Order from *Allen, et al.*, *v. Pataki, et al.*, Supreme Court of the State of New York, Index No. 101712/02.
- 3. Attached hereto as Exhibit B is a true and correct copy of the Docket from *Diaz*, *et al.*, *v. Silver*, *et al.*, U.S. District Court for the Eastern District of New York, Case No. 1:95-cv-02591-DGT-MDG.
- 4. Attached hereto as Exhibit C is a true and correct copy of the Docket from *Bridgeport Coalition, et al.*, v. *Bridgeport, et al.*, U.S. District Court for the District of Connecticut, Case No. 3:93-cv-01476-PCD.

- 5. Attached hereto as Exhibit D is a true and correct copy of a chart and map depicting New York State Population Change by Region from 2000 to 2010, prepared by LATFOR staff.
- 6. Attached hereto as Exhibit E is a true and correct copy of a chart depicting Bronx and New York City Voting Age Population and Citizen Voting Age Population, prepared by LATFOR staff.
- 7. Attached hereto as Exhibit F is a true and correct copy of a list of incumbent pairings in the Enacted Senate Plan, the 63-Seat Common Cause Plan, the Unity Plan, and Todd Breitbart's proposed alternative plan, prepared by LATFOR staff.
- 8. Attached hereto as Exhibit G is a true and correct copy of a list of New York City Minority Districts under the Enacted Senate Plan, prepared by LATFOR staff.
- 9. Attached hereto as Exhibit H is a true and correct copy of the Jurisdictional Statement from *Rodriguez et al.*, *v. Pataki et al.*, U.S. Supreme Court Case No. 04-218.
- 10. Attached hereto as Exhibit I is a true and correct copy of the Motion to Affirm from *Rodriguez et al.*, *v. Pataki et al.*, U.S. Supreme Court Case No. 04-218.
- 11. Attached hereto as Exhibit J is a true and correct copy of a chart depicting Senate Plan Data, prepared by LATFOR staff.
- 12. Attached hereto as Exhibit K is a true and correct copy of a chart depicting Breitbart Plan Data, prepared by LATFOR staff.
- 13. Attached hereto as Exhibit L is a true and correct copy of a chart depicting Common Cause Plan Data, prepared by LATFOR staff.

14. Attached hereto as Exhibit M is a true and correct copy of the April 6, 2012 decision from *NAACP v. Snyder*, U.S. District Court for the Eastern District of Michigan, Civil Action No. 11-15385.

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 May 4, 2012