| NORTHERN DISTRICT OF NEW YO | ORK x | |
|-----------------------------|-----------------|----------------------------|
| ANNE POPE, et al., | : : | |
| Plaintiffs, | : | |
| v. | : : | No. 11-cv-0736 (LEK) (DRH) |
| COUNTY OF ALBANY, et al., | : | |
| Defendants. | : : | |
| | : x | |

UNITED STATES DISTRICT COURT

PLAINTIFFS' FRCP 26 EXPERT DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26, Plaintiffs designate the following individuals as experts, and provide Defendants with the following documents:

- William S. Cooper: Mr. Cooper will serve as Plaintiffs' expert on redistricting and demographics, specifically regarding the socio-economic identification of blacks and Hispanics in Albany County and Albany City, New York.
 - Supplemental Declaration of Williams S. Cooper and exhibits thereto;
 - Exhibit A: William S. Cooper redistricting experience and listing of prior expert testimony;
 - Exhibit B: 2003 expert report of William S. Cooper filed in *Arbor Hill v. County of Albany*;
 - Exhibit C: Prior declaration and expert report of William S. Cooper filed in July 2011 in support of Plaintiff's motion for preliminary injunction in *Pope v. Albany*;
 - Exhibit D: 2008–2010 socio-economic data for Albany County; and
 - Exhibit E: 2008–2010 socio-economic data for the city of Albany.

- 2. Dr. Baodong (Paul) Liu: Dr. Liu will serve as Plaintiffs' expert on voting patterns and racial bloc voting in Albany County.
 - Supplemental Declaration of Dr. Baodong (Paul) Liu dated December 20, 2011
 - Supplemental Expert Report of Dr. Baodong (Paul) Liu dated December 20, 2011 and appendices thereto;
 - Appendix A: Declaration of Dr. Baodong (Paul) Liu dated July 12, 2011 and Expert Report of Dr. Baodong (Paul) Liu dated July 8, 2011;
 - Appendix B: Declaration and Expert Report of Dr. Baodong (Paul) Liu dated May 29, 2003;
 - Appendix C: *Curriculum vitae* of Dr. Baodong (Paul) Liu, including list of prior expert testimony provided within the past 4 years and publications within the past 10 years;
 - Appendix D: Election Data Considered by Dr. Baodong (Paul) Liu;
 - Appendix E: Election Results Source Documents; and
 - Appendix F: Contextual and Qualitative Sources Considered by Dr. Baodong Liu.
- 3. Aaron Mair: Mr. Mair will testify for Plaintiffs regarding redistricting and the possibility of creating a legislative district map for Albany County including five majority-minority districts. Mr. Mair will also testify regarding the past racial discrimination in Albany County, issues facing local communities of interest, black and Hispanic cohesion in Albany County, and the impact of environmental policies on the black and Hispanic communities in Albany County.
 - Supplemental Declaration of Aaron Mair and exhibits thereto;
 - Exhibit A: Prior Declaration of Aaron Mair filed in support of preliminary injunction motion in *Pope v. Albany*;
 - Exhibit B: Curriculum vitae of Aaron Mair; and
 - Exhibit C: Public reports and sources considered.

Plaintiffs reserve their rights to supplement the documents on this list, as necessary.

Dated: December 20, 2011

/s/ Paul DerOhannesian II

Paul DerOhannesian II DerOhannesian & DerOhannesian 677 Broadway, Suite 202 Albany, New York 12207-2985 derolaw@verizon.net Tel: 518.465.6420 Bar Roll No. 104792

Mitchell A. Karlan Gibson, Dunn & Crutcher 200 Park Avenue New York, NY 10166 mkarlan@gibsondunn.com Tel 212.351.3827 Fax 212.351.5254 Bar Roll No. 511874677

Attorneys for Plaintiffs