

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

April 17, 2015

Mitchell A. Karlan
Direct: +1 212.351.3827
Fax: +1 212.351.5254
MKarlan@gibsondunn.com

VIA ECF

Honorable Lawrence E. Kahn
U.S. District Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: *Pope, et al. v. County of Albany, et al.*, No. 11-cv-0736 (LEK/CFH)

Dear Judge Kahn:

We represent Plaintiffs in the above-captioned action. We are writing in response to Defendants' proposed remedial plan submitted to the Court (the "Remedial Map"). See Dkts. 432-1, 432-2, and 432-3. Plaintiffs have reviewed the Remedial Map, and, based on the data separately received from counsel for Defendants, believe that the Remedial Map is in compliance with Your Honor's judgment and order because the Remedial Map contains five legislative districts in which the non-Hispanic DOJ Black voting-age population is a majority. See Dkt. 427 at 80.

To the best of our knowledge, the County Legislature has not voted to adopt the Remedial Plan as a local law or resolution, nor has the County Executive signed any legislative enactment adopting the Remedial Map. We therefore respectfully request that this Court adopt the Remedial Map, and enter a permanent mandatory injunction requiring the Defendants use the Remedial Map to conduct the 2015 and 2019 elections for the Albany County Legislature pursuant to the New York State Board of Elections political calendar.

Plaintiffs thank the Court for its attention to this matter.

Respectfully,

/s/ Mitchell A. Karlan
Mitchell A. Karlan

cc: All counsel of record *via ECF*