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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

BERTHA ARANDA GLATT

Plaintiff,

v.

CITY OF PASCO, *et al.*,

Defendants.

No. 4:16-CV-05108-LRS

DECLARATION OF JOHN A.  
SAFARLI IN SUPPORT OF  
CITY'S MOTION FOR  
ENTRY OF PROPOSED  
REMEDIAL PLAN AND  
FINAL INJUNCTION

DECLARATION OF JOHN A.  
SAFARLI IN SUPPORT OF CITY'S  
MOTION FOR ENTRY OF  
PROPOSED REMEDIAL PLAN AND  
FINAL INJUNCTION

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1 I, John A. Safarli, hereby declare:

2 1. I am one of the attorneys representing Defendants in the above-  
3 captioned matter. I am over the age of 18 and am competent to testify.

4 2. On September 15, 2016, representatives from both parties met to  
5 discuss potential proposals. Plaintiff's representatives made clear that they would  
6 oppose anything other than a plan with seven single-member districts.

7 3. Attached as Exhibit 1 to my declaration is a true and correct copy of  
8 the current City Council map.

9 4. Attached as Exhibit 2 to my declaration is a true and correct copy of  
10 Ordinance No. 4209, which adopted the district boundaries and created two  
11 majority-minority districts.

12 5. Attached as Exhibit 3 to my declaration is a true and correct copy of  
13 the modifications to the City Council boundaries made on July 1, 2015.

14 6. Attached as Exhibit 4 to my declaration is correspondence between  
15 the City and the Franklin County Auditor.

16 7. Attached as Exhibit 5 to my declaration is a true and correct copy of  
17 Ordinance No. 4218.

18 8. Attached as Exhibit 6 to my declaration is a true and correct copy of  
19 the election results from the August 4, 2015 primary for Position 1 (District 1).

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DECLARATION OF JOHN A.  
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1           9.     Attached as Exhibit 7 to my declaration is a true and correct copy of  
2 the election results from the November 3, 2015 general election for Position 1  
3 (District 1), highlighted to show the precincts located in District 1.

4           10.   Attached as Exhibit 8 to my declaration is a true and correct copy of  
5 the election results from the November 8, 2005 general election, highlighted to  
6 show the results of election for Position 7.

7           11.   Attached as Exhibit 9 to my declaration is a true and correct copy of a  
8 portion of the minutes from the City Council's September 19, 2016 meeting.

9           12.   Attached as Exhibit 10 to my declaration is a true and correct copy of  
10 Ordinance No. 4315 and accompanying documents showing the proposal approved  
11 by the City for submission to this Court.

12          13.   Attached as Exhibit 11 to my declaration is an illustrative chart  
13 summarizing the current staggered election system and the two methods of  
14 implementing the City's proposed remedial plan.

15          14.   Attached as Exhibit 12 to my declaration is a true and correct copy of  
16 the election results from the November 3, 2015 general election for Position 6 (at-  
17 large), highlighted to show the precincts located in District 1.

18          15.   Attached as Exhibit 13 to my declaration is the Expert Report of Peter  
19 Morrison, the City's demographer.

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**DECLARATION OF JOHN A.  
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FINAL INJUNCTION - 2**

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1 I declare under penalty of perjury that the foregoing is true and correct.

2  
3 Executed on October 15, 2016.

4 s/ John A. Safarli

5 John A. Safarli, WSBA No. 44056  
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DECLARATION OF JOHN A.  
SAFARLI IN SUPPORT OF CITY'S  
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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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By: s/ John Safarli  
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