

# EXHIBIT 2

November 27, 2017

*William S. Cooper*  
*P.O. Box 16066*  
*Bristol, VA 24209*  
*276-669-8567*  
*bcooper@msn.com*

### **Summary of Redistricting Work**

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 700 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2017, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Virginia, Washington, and Wyoming.

### **Post-2010 Redistricting Experience**

Since the release of the 2010 Census in February 2011, I have developed statewide legislative plans on behalf of clients in seven states (Alabama, Florida, Georgia, Kentucky, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights.

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received

November 27, 2017

Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles I* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah. February

November 27, 2017

19, 2016); and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016). Remedial plans have not yet been adopted in these two cases.

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2017, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding the 32<sup>nd</sup> Judicial District in Louisiana, based in part on my *Gingles* 1 testimony in *Terrebonne Parish Branch NAACP et al. v. Jindal et al* (M.D La. August 17, 2017).

In December 2015, I was retained as a redistricting consultant by the City of Wenatchee, Washington with the charge to prepare a district-based plan which would replace the current at-large system. In June 2016, the Electoral Process Committee presented a seven single-member district plan that I developed to the City Council, with a recommendation that the City of Wenatchee switch to single-member districts as soon as practicable. I am currently preparing redistricting plans for the Wenatchee City Council.

I currently serve as a redistricting consultant and expert to the City of Decatur, Alabama (*Voketz v. City of Decatur*) and to the State of Maryland (*Benisek v. Lamone*).

Pursuant to a court order in *Alabama Legislative Black Caucus et al. v. Alabama* (N.D. Ala. Jan. 20, 2017), I developed statewide legislative remedial plans on behalf of the ALBC plaintiffs.

I am currently a redistricting consultant and expert for the plaintiffs in six voting cases –*Navajo Nation v. San Juan County, Utah; Terrebonne Parish Branch NAACP et al. v. Jindal et al.; Missouri State Conference NAACP et al. v. Ferguson-Florissant School District; NAACP v. Gwinnett County, Georgia; Alabama State Conference NAACP et al. v.*

November 27, 2017

*Alabama*; and *Georgia State Conference NAACP et al v. Georgia*,

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative and to Demos for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work with these two organizations.

**Post-2010 Demographics Experience**

My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Ala., the court made extensive reference to my testimony.

I also serve as an expert consultant to the NAACP LDF in another Alabama desegregation case (*Ellison, et al. v. Madison County Board of Education, et al.* (5:63-cv-00613) and to the NAACP LDF in *Sheff v. O'Neil* – a school desegregation case in Connecticut state court involving the City of Hartford.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the

November 27, 2017

country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

### **Historical Redistricting Experience**

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s, I prepared draft election plans involving about 300 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens’ groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors’ plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Cortez-Montezuma School District in Colorado were adopted in 2009.

November 27, 2017

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in most of these cases.

**Alabama**

*Alabama Legislative Black Caucus et al. v. Alabama et al. (2013)*

**Colorado**

*Cuthair v. Montezuma-Cortez School Board (1997)*

**Georgia**

*Cofield v. City of LaGrange (1996)*

*Love v. Deal (1995)*

*Askew v. City of Rome (1995)*

*Woodard v. Lumber City (1989)*

**Louisiana**

*Knight v. McKeithen (1994)*

*Reno v. Bossier Parish (1995)*

*Wilson v. Town of St. Francisville (1996)*

*Terrebonne Parish NAACP v. Jindal, et al. (2017)*

**Maryland**

*Cane v. Worcester County (1994)*

**Mississippi**

*Addy v Newton County (1995)*

*Boddie v. Cleveland (2003)*

*Boddie v. Cleveland School District (2010)*

*Ewing v. Monroe County(1995)*

*Fairley v. Hattiesburg (2014)*

*Fairley v. Hattiesburg (2008)*

*Jamison v. City of Tupelo (2006)*

*Gunn v. Chickasaw County (1995)*

*NAACP v. Fordice (1999)*

*Nichols v. Okolona (1995)*

*Smith v. Clark (2002)*

**Montana**

*Old Person v. Cooney (1998)*

*Old Person v. Brown (on remand) (2001)*

November 27, 2017

**Missouri**

*Missouri NAACP v. Ferguson-Florissant School District (2016)*

**Nebraska**

*Stabler v. Thurston County (1995)*

**New York**

*Arbor Hills Concerned Citizens v. Albany County (2003)*

*Pope v. County of Albany (2015)*

**South Carolina**

*Smith v. Beasley (1996)*

**South Dakota**

*Bone Shirt v. Hazeltine (2004)*

*Cottier v. City of Martin (2004)*

**Tennessee**

*Cousins v. McWherter (1994)*

*Rural West Tennessee African American Affairs Council v. McWherter (1993)*

**Virginia**

*Henderson v. Richmond County (1988)*

*McDaniel v. Mehfoud (1988)*

*White v. Daniel (1989)*

*Smith v. Brunswick County (1991)*

**Wyoming**

*Large v. Fremont County (2007)*

In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or date of last declaration or supplemental declaration:

**Alabama**

*Voketz v. City of Decatur (2014)*

*Alabama State Conference of the NAACP v. Alabama (2017)*

**Florida**

*Calvin v. Jefferson County (2016)*

*Thompson v. Glades County (2001)*

*Johnson v. DeSoto County (1999)*

*Burton v. City of Belle Glade (1997)*

November 27, 2017

**Georgia**

*Georgia NAACP et al. v. Gwinnett County, GA (2017)*  
*Georgia State Conference NAACP, et al. v. Fayette County (2015)*  
*Knighton v. Dougherty County (2002)*  
*Johnson v. Miller (1998)*  
*Jones v. Cook County (1993)*

**Kentucky**

*Herbert v. Kentucky State Board of Elections (2013)*

**Louisiana**

*NAACP v. St. Landry Parish Council (2005)*  
*Rodney v. McKeithen (1993)*  
*Prejean v. Foster (1998)*

**Maryland**

*Fletcher v. Lamone (2011)*  
*Benisek v. Lamone (2017)*

**Mississippi**

*Partee v. Coahoma County (2015)*  
*Figgs v. Quitman County (2015)*  
*West v. Natchez (2015)*  
*Williams v. Bolivar County (2005)*  
*Clark v. Calhoun County (on remand)(1993)*  
*Houston v. Lafayette County (2002)*  
*Wilson v. Clarksdale (1992)*  
*Stanfield v. Lee County(1991)*  
*Teague v. Attala County (on remand)(1993)*

**Montana**

*Alden v. Rosebud County (2000)*

**North Carolina**

*Lewis v. Alamance County (1991)*  
*Gause v. Brunswick County (1992)*  
*Webster v. Person County (1992)*

**Rhode Island**

*Davidson v. City of Cranston (2015)*

**South Carolina**

*Vander Linden v. Campbell (1996)*

**South Dakota**

*Emery v. Hunt (1999)*  
*Kirkie v. Buffalo County (2004)*

November 27, 2017

**Tennessee**

*NAACP v. Frost, et al. (2003)*

**Utah**

*Navajo Nation v. San Juan County (2016)*

**Virginia**

*Moon v. Beyer (1990)*

**Washington**

*Montes v. City of Yakima (2014)*

*Glatt v. City of Pasco (2016)*

###