

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

MS.PATRICIA FLETCHER,)
 et al.,)
)
)
 Plaintiffs,)
)
 v.)
)
 LINDA LAMONE in her official)
 capacity as State Administrator of)
 Elections for the state of Maryland;)
 And ROBERT L. WALKER in his)
 official capacity as Chairman of the)
 State Board of Elections,)
)
 Defendants.)
 _____)

Civ. Action No.: RWT-11-3220

DECLARATION OF JASON TORCHINSKY

JASON TORCHINSKY declares, pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to practice before the courts of the Commonwealth of Virginia, the District of Columbia and before this Court, as *Pro Hac Vice*. I am a partner with the firm, Holtzman Vogel, PLLC, co-counsel for Plaintiffs in this matter. I make this declaration in support of Plaintiffs' Memorandum In Support Of Their Motion For Preliminary Injunction as to Counts Three and Six of the Complaint.
2. Attached hereto as Attachment A is a true and correct copy of pages , 90, and 143 of *Report of Maryland Precinct Population Data: 2010 Census Adjusted Maryland Redistricting Data and Unadjusted Census Population Count*, (2011). The whole report is available at http://planning.maryland.gov/PDF/redistricting/2010data/GreenReport_print.pdf. Additionally, attached is the U.S. Census Bureau's explanation on how percentages for those who identify themselves as Hispanic are not added to percentages in any racial category.
3. Attached hereto as Attachment B is a true and correct copy of Maryland Attorney General Doug Gansler's 2009 opinion referenced as 94 Op. Att'y Gen. Md. 125 (2009).

4. Attached hereto as Attachment C is a true and correct copy of the October 20, 2011 letter from Maryland Attorney General Doug Gansler.
5. Attached hereto as Attachment D is a true and correct copy of the March 22, 2011 Maryland Department of Planning press release entitled “*Maryland Redistricting Population Count Released.*”
6. Attached hereto as Attachment E is a true and correct copy of the *Statistical Abstract of the United States 2012*, Education Page 178. The web version is available at <http://www.census.gov/compendia/statab/2012/tables/12s0278.pdf>.
7. Attached hereto as Attachment F is a true and correct copy of the *Statistical Abstract of the United States 2012*, National Security and Veterans Affairs page 334. The web version is available at <http://www.census.gov/compendia/statab/2012/tables/12s0509.pdf>.
8. Attached hereto as Attachment G is a true and correct copy of plan statistics and an overview map for a modified version of the Pipkin plan correcting deviations for Census’ actual enumeration and establishing population equality.
9. Attached hereto as Attachment H is a true and correct copy of the images of the districts at issue in the *Gomillion* case and the districts created by SB1.
10. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 18, 2011.

/s/ Jason Torchinsky
Jason Torchinsky