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BY E-MAIL AND UNITED STATES MAIL

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Re: *Holt et al. v. 2011 Legislative Reapportionment Commission*

Dear Counsel:

We represent Petitioners Amanda E. Holt, Elaine Tomlin, Louis Nudi, Diane Edbril, Dariel I. Jamieson, Lora Lavin, James Yoest, Jeffrey Meyer, Christopher H. Fromme, Timothy F. Burnett, Chris Hertzog, Glen Eckhart and Mary Frances Ballard (“Petitioners”).

In view of the Pennsylvania Supreme Court’s determination that the 2011 Final Plan adopted by the 2011 Legislative Reapportionment Commission (“LRC”) is contrary to law we write to offer assistance to the LRC in its challenge to develop a new plan in accordance with the Supreme Court’s opinion and order. We recognize the LRC’s task requires revising, approving, and implementing its plan while providing for public notice and comment and minimizing the impact of this process on the current election cycle.. As the Court explained:

The Holt alternative plan avoided a highly significant percentage of political subdivision splits and fractures while maintaining a lower average population deviation from the ideal than the Final Plan. . . . the number of

fractures across the Commonwealth was considerably higher in the Final Plan than the Holt plan proved was easily achievable.

Opinion at 77.

We do not suggest, nor did the Court hold, that the LRC is obligated to adopt the Holt Plan on remand. However, we recognize that the LRC must heed the Court's observation that the Holt Plan "is powerful evidence indeed" as to what subdivision splits are "absolutely necessary" under Article II, Section 16, of the Pennsylvania Constitution. To assist the LRC on remand, Petitioners are prepared to provide the LRC and its representatives with data on the Holt Plan and to identify ways in which the plan might be modified to address concerns of the LRC without substantially increasing the number of splits. Petitioners have no objection to exploring other constitutionally permissible modifications of the Holt Plan, and stand ready to help the LRC in any way they can.

No matter what the decision of the federal court, speed and clarity is important. Thus, we believe that the Holt Plan is the only serious starting point. Petitioners welcome the opportunity to assist the LRC.

Sincerely yours,

A handwritten signature in black ink that reads "Virginia A. Gibson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Virginia A. Gibson, Esq.

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cc: Petitioners
Michael Churchill, Esq.