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June 29, 2017

United States District Court  
Middle District of North Carolina  
324 W. Market Street  
Greensboro, NC 27401

Judges James A. Wynn, Jr., Thomas D. Schroeder and Catherine C. Eagles:

We write you today concerning *North Carolina v. Covington* and the pending decision regarding the redrawing of our state’s legislative districts.

Common Cause NC is a nonpartisan organization with a long history advocating for an impartial, nonpartisan process for drawing legislative and congressional districts in North Carolina, both when Democrats were in control of the General Assembly and now with Republicans in control. We believe that a more neutral process would produce more competitive districts that better reflect the state as a whole, which, in the end, benefits the citizens of North Carolina.

As we have seen, and as multiple court rulings validate, the N.C. General Assembly has proven itself incapable of drawing maps that pass constitutional muster and judicial scrutiny. Most recently, when forced by the courts to redraw congressional districts in 2016, leadership in the General Assembly openly admitted that new districts would be drawn to maximize partisan advantage for the Republican Party.

Therefore, we respectfully call on this court to require the use of strict, nonpartisan criteria when creating a new state legislative district plan.

At Common Cause NC, we have hosted two simulations, conducted by well-respected bipartisan entities, where nonpartisan criteria were followed in drawing congressional and legislative districts. The process works and resulted in districts that were more compact, met the requirements of the Voting Rights Act and resulted in more competitive districts.

Enclosed are copies of those maps and the nonpartisan criteria followed.

We hope you will give this request consideration when determining how to move forward in *North Carolina v. Covington* and the appropriate remedy for redrawn legislative districts.

Sincerely,

Bob Phillips, Executive Director  
Common Cause North Carolina

EXHIBIT 18  
WIT: PHILLIPS  
DATE: 5-13-19  
Sophie Brock, RMR, CRR

Legislative Defendants Trial  
**Ex.241**