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**From:** Kimberly Reynolds  
**Sent:** Monday, August 21, 2017 12:50 PM  
**To:** Robert Howard  
**Subject:** FW: TPs

FYI

**From:** Scott Falmlen [mailto:SFalmlen@nexusstrategies.com]  
**Sent:** Monday, August 21, 2017 12:07 PM  
**To:** Kimberly Reynolds <kimberlyreynolds@ncdemocraticparty.org>; Casey Wilkinson <CaseyWilkinson@ncdemocraticparty.org>; Ryan Deeter <ryandeeter@ncdemocraticparty.org>  
**Subject:** TPs

Here are some points to be made.

Best point at this point is that these maps repeat the extreme 2016 congressional gerrymander.

Just as they did in 2016 Moore and Berger have tried to cure an illegal racial gerrymander with an illegal partisan gerrymander.

The power to draw districts must be taken from the legislature or our Democracy is doomed.

Just 3 months ago the USCS plainly held that race cannot be used to obtain partisan advantage. Once again Berger and Moore are defying the USCS. Just look at Cumberland in the Senate plan. To protect their man in SD 19 they have divided citizens based on their race so that more than half of the citizens in SD 21 are Black and fewer than 25 percent of citizens in SD 19 are Black. Same point can be made in Guilford, maintained Robinson at more than 50 solely to gain partisan advantage.

In their mad dash to protect the illegal partisan advantage they gained from their illegal racial gerrymander Berger and Moore have even redrawn districts that the state constitution forbids them from redrawing and that the fed order does not authorize them to redraw.

In the House map in particular, the GOP – in defiance of the Court’s order - has redrawn districts that were not affected by the Court ruling.

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EXHIBIT 11  
WIT: GOODWIN  
DATE: 5-15-19  
Sophie Brock, RDR, CRR

Legislative Defendants Trial  
Ex.300