

July 15, 2011

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By Hand Delivery

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Citizens Redistricting Commission
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Re: Request for Information

Dear Commission Members:

Since being asked to apply to the Commission in connection with potential litigation, I have done some research and thought quite a bit about the fit necessary to defend the Commission. Because these matters are political in several different senses, you will need someone to stand up straight and concentrate on the law. I have done that my whole career. I have no idea what the political parties of all of my clients over the years have been but I would guess that it is evenly split. For example, I obtained an 8-0 victory in the U.S. Supreme Court for several California political parties in *Eu v. San Francisco County Democratic Central Committee*, 109 S. Ct. 1013 (1989). The case involved the power of the California legislature to limit terms and conditions of political parties. I have attached a copy of the decision to our application.

For a number of years, I have lectured on the U.S. Supreme Court in various venues. Those lectures included analysis and presentation of voting rights cases including the following:

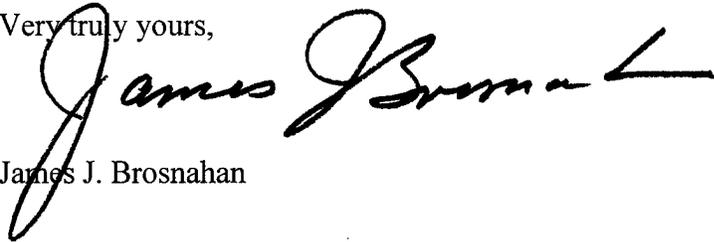
1. Citizens United v. Federal Election Com'n, 130 S.Ct. 876 (2010)
2. Northwest Austin Mun. Utility Dist. No. One v. Holder, 129 S.Ct. 2504 (2009)
3. Bartlett v. Strickland, 556 U.S. 1, 129 S.Ct. 1231 (2009)
4. Crawford v. Marion County Election Bd., 553 U.S. 181, 128 S.Ct. 1610 (2008)
5. Purcell v. Gonzalez, 549 U.S. 1, 127 S.Ct. 5 (2006)
6. League of United Latin American Citizens v. Perry, 548 U.S. 399, 126 S.Ct. 2594 (2006)
7. Lance v. Dennis, 546 U.S. 459, 126 S.Ct. 1198 (2006)
8. Vieth v. Jubelirer, 541 U.S. 267, 124 S.Ct. 1769 (2004)
9. Georgia v. Ashcroft, 539 U.S. 461, 123 S.Ct. 2498 (2003)

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I have put together a very seasoned team, quite used to doing their job under the public spotlight. George Harris and I have tried a number of extremely serious, complicated and visible cases both civil and criminal. If I were to do this, I would spend considerable time personally leading the matter. Since no one quite knows whether there will be one case, several cases or many cases, our team would be able to expand as needed. I commit to you, however, that there would be no unnecessary staffing at any time because staffing is a cause of expense.

If any of you have any questions of me, I would be happy to respond.

Very truly yours,

A handwritten signature in black ink that reads "James J. Brosnahan". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

James J. Brosnahan