

December 17, 2021

STATE OF MINNESOTA

SPECIAL REDISTRICTING PANEL

OFFICE OF APPELLATE COURTS

A21-0243 A21-0546

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota.

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

VS.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

AFFIDAVIT OF NICK HARPER IN SUPPORT OF THE WATTSON PLAINTIFFS' RESPONSE TO OTHER PARTIES' CONGRESSIONAL AND LEGISLATIVE REDISTRICTING PLANS and

Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpao Lee, Abdirazak Mahboub, Aida Simon, Beatriz Winters, Common Cause, OneMinnesota.org, and Voices for Racial Justice,

Plaintiff-Intervenors,

VS.

Steve Simon, Secretary of State of Minnesota,

Defendant.

STATE OF MINNESOTA)

) ss.

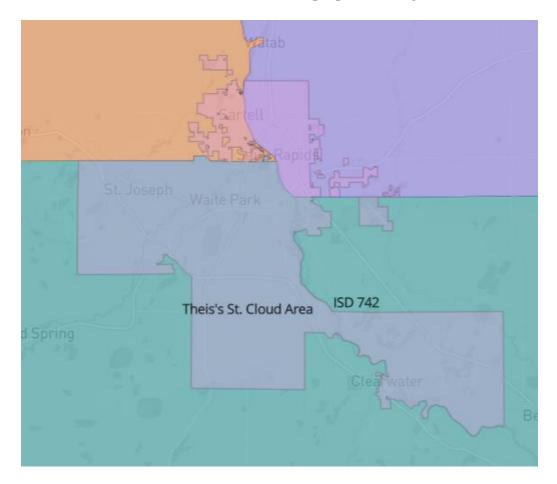
COUNTY OF HENNEPIN)

Nick Harper, being first duly sworn, deposes and states as follows:

- 1. I am the Civil Engagement Director for Plaintiff League of Women Voters Minnesota in the above-captioned matter and make this Affidavit in support of the Proposed Congressional and Legislative Redistricting Plans of Plaintiffs Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota ("Wattson Plaintiffs").
- 2. In my role as Civic Engagement Director, I advise our organization's members and volunteers on nonpartisan voter engagement and lead our staff advocacy efforts. Part of this work includes working with other organizations on civic engagement

opportunities, including nonpartisan candidate forums and voter registration, civic education, legislative advocacy, and litigation. During the last several years, these efforts have included education and engagement on census and redistricting to encourage Minnesotans to participate in the apportionment and redistricting process.

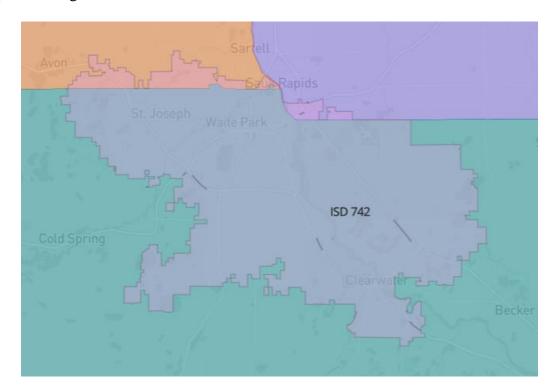
3. The map I created showing the St. Cloud area described by Representative Tama Theis overlaid on the Anderson Plaintiffs' proposed Congressional Plan:



4. I created the map showing the St. Cloud area described by Representative Tama Theis overlaid on the Anderson Plaintiffs' proposed Congressional Plan by first creating a Community of Interest map using Dave's Redistricting App by filling in the cities that Representative Theis described as being in the St. Cloud Area. I then imported

the Anderson Parties' Congressional Plan into Dave's Redistricting App and overlaid that Community of Interest map onto it.

5. The map I created showing ISD 742 overlaid on the Anderson Plaintiffs' proposed Congressional Plan:



6. I created the map showing ISD 742 overlaid on the Anderson Plaintiffs' proposed Congressional Plan by first downloading a GIS file of all school district boundaries from the Minnesota Geospatial Commons managed by MN.IT. I then created a Community of Interest map using Dave's Redistricting App by filling in the census blocks that comprise ISD 742. I then imported the Anderson Parties' Congressional Plan into Dave's Redistricting App and overlaid that Community of Interest map onto it.

Consistent with Minnesota Statute § 358.116, I declare under penalty of perjury that everything I have stated in this document is true and correct.

Date: December 17, 2021 /s/ Nick Harper

Nick Harper

Hennepin County, Minnesota

County and state signed