

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

FILED

December 7, 2021

OFFICE OF
APPELLATE COURTS

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,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo 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.

**SACHS PLAINTIFFS’ MOTION TO ADOPT
PROPOSED LEGISLATIVE REDISTRICTING PLAN**

Pursuant to the scheduling order issued by the Special Redistricting Panel (the “Panel”) on October 26, 2021, Plaintiffs Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O’Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer (the “Sachs Plaintiffs”) hereby submit this motion to adopt their proposed legislative redistricting plan.

Concurrently with this motion, the Sachs Plaintiffs have filed the following materials:

- Memorandum in Support of Motion to Adopt Proposed Legislative Redistricting Plan
- Proposed Legislative Redistricting Plan (in Excel format)

- Legislative Maps (including the entire state, the 11-county metropolitan area area, Duluth, Mankato, Moorhead, Minneapolis/St. Paul, Rochester, and St. Cloud)
- Population Summary Reports (Senate and House)
- Plan Components (Short) Reports (Senate and House)
- Contiguity Reports (Senate and House)
- Political Subdivisions Splits Between Districts Reports (Senate and House)
- Minority Voting-Age Population Reports (Senate and House)¹
- District Statistics Reports (Senate and House)
- Measures of Compactness Reports (Senate and House)
- American Indian Tribal Reservation by District and by County Report (Senate and House)
- Communities of Interest Plan Components (Short) Report (House)
- Communities of Interest by District and by County Report (House)

Additionally, pursuant to the Panel’s plan submission requirements, the Sachs Plaintiffs have submitted one paper original and eight paper copies of their legislative maps to the Panel. The Sachs Plaintiffs will also provide the Legislature and the Governor with a block-equivalency file for their proposed legislative plan.

¹ The Sachs Plaintiffs note that their Minority Voting-Age Population Reports automatically include an inaccurate set of definitions at the bottom of the page. Instead of these definitions, the reported statistics actually reflect the November 3, 2021, release of census data from the Minnesota Legislature.

Dated: December 7, 2021

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Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

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GARRISON O'KEITH MCMURTREY; MARA LEE GLUBKA; JEFFREY STRAND;
DANIELLE MAIN; AND WAYNE GRIMMER**