

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DONALD AGEE, JR., an individual, *et al.*,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity as the Secretary of State of Michigan, *et al.*;

Defendants.

Case No. 1:22-cv-00272

**Three-Judge Panel Appointed
Pursuant to 28 U.S.C. § 2284(a)**

**PLAINTIFFS' STATEMENT OF NON-OBJECTION TO DEFENDANTS'
FINAL SENATE REMEDIAL PLAN**

Plaintiffs, by counsel, respectfully submit the following Statement of Non-Objection to Defendants' Final Senate Remedial Plan (ECF No. 184, PageID.5888-5890) in accordance with this Court's Order Regarding Senate Timelines and Fees dated April 15, 2024 (ECF No. 178, PageID.5863-5865). As explained in the July 1, 2024 "Analysis of Proposed Michigan Senate Maps" prepared by Sean P. Trende, Ph.D. and attached as **Exhibit A**, Defendants' Final Senate Remedial Plan (Crane A1) complies with this Court's previous orders and represents a significant improvement from the former Linden Plan. Defendants' Final Remedial Senate Plan (Crane A1) eliminates the former "spoke concept," reduces county splits, is reasonably compact, has an appropriate core retention, enhances minority voting opportunity, maintains an acceptable partisan balance, and does not evidence any impermissible

reliance upon race. Accordingly, Plaintiffs support the adoption of Defendants' Final Senate Remedial Plan (Crane A1).

Dated: July 2, 2024

Respectfully submitted,

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