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April 22, 2004

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## By Telefacsimile

John A. Tarantino, Esq.  
Adler, Pollack & Sheehan P.C.  
2300 Financial Plaza  
Providence, RI 02903

Re: *Metts v. Murphy*, 02-204T (D.R.I.)

Dear Mr. Tarantino:

At the request of Anita Earls and Sunil Kulkarni, I am writing to you in follow-up to the status conference with Judge Torres earlier this week. I understand that during this conference, you asked Plaintiffs to provide Defendants with an informal request for documents within Defendants' possession, custody or control. I am writing to make such a request. (This is the same request Anita referenced in her letter to you sent earlier today.)

Plaintiffs request the following documents:

1. Any studies, reports or analyses prepared by or for the Rhode Island General Assembly over the last 15 years concerning any of the following subjects:
  - a. Minority voting patterns;
  - b. Discrimination against minorities in voting, or disproportionate impact of certain voting-related practices (*e.g.*, voter registration requirements, polling place locations, district line-drawing) on minorities;
  - c. Discrimination against minorities (or disproportionate impact on minorities) for issues related to housing (*e.g.*, bank redlining for mortgage loans), health (*e.g.*, infant mortality), education, or employment; and
  - d. Census or demographic studies of minority groups (*e.g.*, data concerning average income levels and level of education attained).

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2. Any studies or accounts prepared by or for the General Assembly concerning the history of the General Assembly or the history of elections to the General Assembly.

3. Any studies, analyses or compilations completed by or for the General Assembly in connection with the 2000 redistricting process.

4. Any maps or diagrams of proposed Senate districts considered during the 2000 redistricting process.

5. Any maps or diagrams of previous Senate districts approved by the General Assembly within the last 30 years.

We will contact Raymond Marcaccio directly for election returns and voter registration data that we need from the State Board of Elections.

Please produce all documents in the above-mentioned categories by **May 5**, where possible. We understand that Judge Torres's Scheduling Order sets an outside date of May 11 to produce election-related documents, *see* Sch. Order ¶ 4(b), but in order for our experts to produce to you their expert reports on May 11, *id.* ¶ 4(a), they will need time to review the documents.

Alternatively, if any of the requested documents are easily available upon request by members of the public, please identify by no later than **April 27** the appropriate contact person in the appropriate state department or agency for that document, and we will contact that person directly.

If you have any questions regarding these informal requests, please do not hesitate to contact us. We appreciate your assistance.

Sincerely,

Cathryn M. Sadler

cc: Reed Witherby, Esq. (by facsimile)  
Raymond Marcaccio, Esq. (by facsimile)  
Normand Benoit, Esq. (by facsimile)  
Katherine Merolla, Esq. (by facsimile)