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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

ROGELIO MONTES and MATEO  
ARTEAGA,

Plaintiffs,

vs.

CITY OF YAKIMA; MICAH  
CAWLEY, in his official capacity as  
Mayor of Yakima; and MAUREEN  
ADKISON, SARA BRISTOL, KATHY  
COFFEY, RICK ENSEY, DAVE ETTL,  
and BILL LOVER, in their official  
capacity as members of the Yakima City  
Council,

Defendants.

NO. 12-cv-3108-TOR

DECLARATION OF FRANCIS S.  
FLOYD IN SUPPORT OF  
DEFENDANTS' RESPONSE

1 I, Francis S. Floyd, hereby state and declare as follows:

2 1. I represent Defendants in this matter and have personal knowledge of  
3 the matters stated herein.

4 2. Attached to my declaration as **Exhibit A** is a true and correct copy of  
5 Dr. Richard L. Engstrom's "Report on Cumulative Voting" filed in *United States*  
6 *v. Village of Port Chester*, No. 06-cv-15173 (S.D.N.Y.), ECF No. 91-1. I obtained  
7 this document using PACER.

8 3. Attached to my declaration as **Exhibit B** is a true and correct copy of  
9 Dr. Richard L. Engstrom's article entitled, "Cumulative and Limited Voting:  
10 Minority Electoral Opportunities and More," published in the Saint Louis  
11 University Public Law Review.

12 I declare under penalty and perjury under the laws of the United States of  
13 America that the foregoing is true and correct.

14 Executed this 23rd day of October, 2014, at Seattle, Washington.

15  
16 s/ Francis S. Floyd  
17 Francis S. Floyd, WSBA No. 10642  
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the State of Washington, that on the date noted below, a true and correct copy of the foregoing was delivered and/or transmitted in the manner(s) noted below:

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8 DATED this 23rd day of October, 2014

10 s/ Yalda Biniazan  
11 Yalda Biniazan, Legal Assistant