

a. According to the 2010 Adjusted Census Data, 50.2% of the voting age population in the 4th Senatorial District, Senator Haywood's district, was African-American.

b. According to the 2020 Adjusted Census Data, 49.7% of the voting age population in the 4th Senatorial District, Senator Haywood's district, was African-American.

c. According to the 2010 Adjusted Census Data, 50.4% of the voting age population in the 7th Senatorial District, Senator Hughes' district, was African-American.

d. According to the 2020 Adjusted Census Data, 47.5% of the voting age population in the 7th Senatorial District, Senator Hughes' district, was African-American.

e. According to the 2010 Adjusted Census Data, 62.5% of the voting age population in the 3rd Senatorial District, Senator Street's district, was African-American.

f. According to the 2020 Adjusted Census Data, 57.4% of the voting age population in the 3rd Senatorial District, Senator Street's district, was African-American.

g. According to the 2010 Adjusted Census Data, 63% of the voting age population in the 8th Senatorial District, Senator Williams' district, was African-American.

h. According to the 2020 Adjusted Census Data, 60% of the voting age population in the 8th Senatorial District, Senator Williams' district, was African-American.

2. The *Carter* Petitioners declined to so stipulate.

3. Nevertheless, this Honorable Court should take judicial notice of adjudicative facts that are not subject to reasonable dispute because they are “generally known within the trial court’s territorial jurisdiction” or because they “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Pa.R.E. 201(b).

4. Indeed, although this Honorable Court is free to take judicial notice on its own, it “must take judicial notice if a party requests it and the court is supplied with the necessary information.” Pa.R.E. 201(c).

5. Additionally, judicial notice is appropriate at “any stage in the proceeding.” Pa.R.E. 201(d).

6. Here, the foregoing facts which are reiterations of census data and existing boundary lines, are not subject to reasonable dispute because they can be accurately and readily determined from sources whose accuracy cannot reasonably be

questioned. *See generally* Legislative Reapportionment Commission, “Maps,” <https://www.redistricting.state.pa.us/maps/> (last visited Jan. 7, 2022).¹

WHEREFORE, Proposed Democratic Senate Intervenors respectfully request that this Honorable Court take judicial notice of the above-detailed facts.

Respectfully submitted,

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¹ The same data provides the basis for numerous redistricting software applications that allow simple calculation of such demographic information. *See, e.g.*, Maptitude for Redistricting, available at <https://www.caliper.com/mtredist.htm> (last visited Jan. 6, 2022).

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