

EXHIBIT C

MARCH 11, 2022 EMAIL CORRESPONDENCE BETWEEN COUNSEL

From: [Andrew D. Freeman](#)
To: [Martinez, Melissa O.](#)
Cc: [Ava E. Lias-Booker \(alias-booker@mcguirewoods.com\)](#); [kbarber@mcguirewoods.com](#); [James R. Benjamin Jr.](#); [zzz.External.jeon@aclu-md.org](#); [Freedman, John A.](#); [Colley, Mark D.](#); [Mazzullo, Michael](#); [Racheva, Youlia](#); [Tierney Peprah](#)
Subject: RE: Baltimore County redistricting -- performance analysis by County
Date: Friday, March 11, 2022 3:34:00 PM
Attachments: [Districts 2022-03-10_Plan.zig](#)
[Baltimore County Maryland ACS Black and Latino 5YR.PDF](#)

External E-mail

Melissa:

As you requested, attached are (1) the shapefiles for Mr. Cooper's March 8 map, and (2) the ACS data for Baltimore County, which is available on-line at http://www.fairdata2000.com/ACS_2015_19/All_Counties/.

I must have misunderstood what Ava said regarding how the March 8 and March 10 maps would perform. Please confirm that the County has not conducted its own performance analysis and does not intend to rely on any such analysis other than that conducted by Dr. Barreto.

Thanks.

Andy

From: Martinez, Melissa O. <MMartinez@mcguirewoods.com>
Sent: Friday, March 11, 2022 2:28:32 PM
To: Andrew D. Freeman <adf@browngold.com>; Lias-Booker, Ava E. <alias-booker@mcguirewoods.com>
Cc: Barber, Kathryn M. <KBarber@mcguirewoods.com>; James R. Benjamin Jr. <jrbenjamin@baltimorecountymd.gov>; Debbie A. Jeon (jeon@aclu-md.org) <jeon@aclu-md.org>; John A. Freedman - Arnold & Porter Kaye Scholer LLP (john.freedman@arnoldporter.com) <john.freedman@arnoldporter.com>; Colley, Mark D. <mark.colley@arnoldporter.com>; Michael Mazzullo (Michael.Mazzullo@arnoldporter.com) <michael.mazzullo@arnoldporter.com>; Youlia.Racheva@arnoldporter.com <youlia.racheva@arnoldporter.com>; Tierney Peprah <tpeprah@aclu-md.org>
Subject: RE: Baltimore County redistricting -- performance analysis by County

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Andy,

During the hearing, Ava referred to the data in Table 1 in Dr. Barretto's declaration, which shows that, under the new proposed redistricting map submitted by the County, Anthony Brown would

have won in the 2014 gubernatorial election in District 2 and the result is negligible between the two candidates in the gubernatorial election in 2018 in District 2.

Can you please send us the shapefiles for the Cooper map as soon as possible? Also, please provide us with the citation or source for Cooper's assertion that 42% of the County's Latinx population are non-citizens.

Thanks,
Melissa

Melissa O. Martinez

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From: Andrew D. Freeman <adf@browngold.com>
Sent: Friday, March 11, 2022 2:16 PM
To: Lias-Booker, Ava E. <alias-booker@mcguirewoods.com>
Cc: Martinez, Melissa O. <MMartinez@mcguirewoods.com>; Barber, Kathryn M. <KBarber@mcguirewoods.com>; James R. Benjamin Jr. <jrbenjamin@baltimorecountymd.gov>; Debbie A. Jeon (jeon@aclu-md.org) <jeon@aclu-md.org>; John A. Freedman - Arnold & Porter Kaye Scholer LLP (john.freedman@arnoldporter.com) <john.freedman@arnoldporter.com>; Colley, Mark D. <mark.colley@arnoldporter.com>; Michael Mazzullo (Michael.Mazzullo@arnoldporter.com) <michael.mazzullo@arnoldporter.com>; Youlia Racheva <Youlia.Racheva@arnoldporter.com>; Tierney Peprah <tpeprah@aclu-md.org>
Subject: RE: Baltimore County redistricting -- performance analysis by County

****EXTERNAL EMAIL; use caution with links and attachments****

Re-sending to include Mr. Benjamin.

From: Andrew D. Freeman
Sent: Friday, March 11, 2022 2:15 PM
To: Ava E. Lias-Booker (alias-booker@mcguirewoods.com) <alias-booker@mcguirewoods.com>
Cc: Martinez, Melissa O. <MMartinez@mcguirewoods.com>; kbarber@mcguirewoods.com; Debbie A. Jeon (jeon@aclu-md.org) <jeon@aclu-md.org>; John A. Freedman - Arnold & Porter Kaye Scholer LLP (john.freedman@arnoldporter.com) <john.freedman@arnoldporter.com>; Colley, Mark D. <mark.colley@arnoldporter.com>; Michael Mazzullo (Michael.Mazzullo@arnoldporter.com) <michael.mazzullo@arnoldporter.com>; Youlia.Racheva@arnoldporter.com; Tierney Peprah <tpeprah@aclu-md.org>
Subject: Baltimore County redistricting -- performance analysis by County

Ava:

In your presentation to the court today, you referred to analysis regarding how the County believes its latest proposed map and the Plaintiffs' latest proposed map (of March 8 and March 10,

respectively) would perform for Black voters' candidates of choice. The County has not included any such analysis in any of its filings, including its filing today. Plaintiffs included Dr. Barreto's performance analysis in his second and third declarations.

If the County intends to rely on any performance analysis or other data to defend its proposed map or to criticize Plaintiffs' proposed map (either in its brief on March 17 or in the hearing on March 21), please provide that analysis and data to Plaintiffs' counsel as soon as possible, and no later than close of business on Monday for the analysis to which you referred today.

Thank you.

Andy

Andrew D. Freeman

Attorney

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