

To clarify, when filing the Statement of Interest of the United States With Respect to Section 2 of the Voting Rights Act (Doc. 504), the United States did not submit its illustrative Congressional plan as a proposed interim plan. Rather, that partial illustrative plan, which is now available on the State's RedAppl System as Plan C219,¹ was proffered to show that it would be possible to draw an additional geographically compact district in the region of South and West Texas that would provide Hispanic voters with an opportunity to elect their preferred candidates.²

¹ The United States notes that certain minor changes to the illustrative map accompanying Attachment B to the Statement of Interest of the United States with Respect to Section 2 of the Voting Rights Act (Doc. No. 504) have been made to rectify some small technical issues. After filing its brief, the United States discovered that there were a few census blocks in the map that had been misassigned. The subsequent corrections of these misassigned blocks are reflected in the map identified as Plan C219 on the Texas Legislative Council's redistricting website. The adjustments are not material to the arguments made in the Statement of Interest.

² With regard to Texas's contention that the United States has failed to account for a decrease in the size of Texas's ideal Congressional district following reapportionment and that all candidates therefore receive fewer votes in recompiled election results in proposed Congressional District 23 than in the benchmark, *see* Defendants' Response at 6-7, the United States points to the State's recompiled election results, which show that in fourteen of the sixteen elections examined, the estimated Hispanic share of the electorate in proposed District 23 decreased. In the other two elections, the rate remained exactly the same or increased by only 0.1 percent. *See* State of Texas's Racially Polarized Voting Analysis for Congressional District 23, United States' Identifications of Elections Considered, *Texas v. United States*, No. 1:11-cv-1303 (D.D.C., filed Oct. 3, 2011), ECF Nos. 58-9 at 3 & No. 58-10 at 3.

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