

January 6, 2012

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By Fax (415-865-7183) and Mail

Supreme Court of California  
350 McAllister Street  
San Francisco, CA 94102

Attn: Frederick K. Ohlrich, Court Administrator  
and Janell Hunter, Deputy Clerk

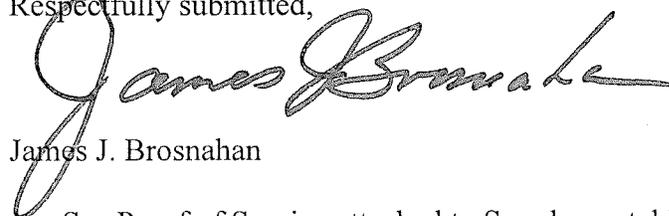
Re: *Julie Vandermost v. Debra Bowen*, No. S198387

Dear Clerk of the Court:

Pursuant to the Court's Order dated December 29, 2011 in the above-captioned action, I have enclosed for filing the Citizens Redistricting Commission's errata to our Supplemental Letter Reply Brief. Hard copies will follow by mail.

Thank you for your assistance with this fax filing.

Respectfully submitted,



James J. Brosnahan

cc: See Proof of Service attached to Supplemental Letter Reply Brief

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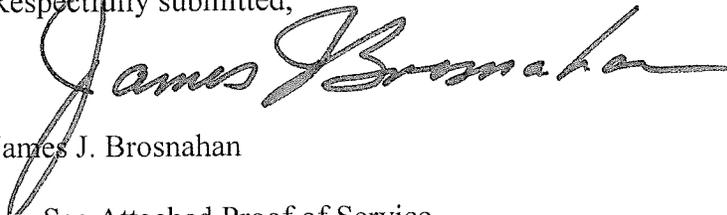
Attn: Frederick K. Ohlrich, Court Administrator  
and Janell Hunter, Deputy Clerk

Re: *Julie Vandermost v. Debra Bowen*, No. S198387

To the Honorable Tani Gorre Cantil-Sakauye, Chief Justice, and the Honorable Associate Justices of the Supreme Court of the State of California:

Further to our letter of today's date, the Commission has reviewed the supplemental reply filed today by the Secretary of State. As the Commission previously noted, the Secretary of State is the chief elections officer authorized to speak on matters affecting elections. (*Assembly v. Deukmejian* (1982) 30 Cal.3d 638, 650.) The Commission agrees with the Secretary of State's conclusion that projections based on a random sample that are merely "more than 100%" are not reliable enough to support a conclusion that the referendum is likely to qualify. In this regard, Paragraph 4 of our letter of earlier today was incorrect and should be disregarded.

Respectfully submitted,



James J. Brosnahan

cc: See Attached Proof of Service

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 425 Market St., San Francisco, California 94105-2482. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on January 6, 2012, I served a copy of:

**ERRATA TO OUR SUPPLEMENTAL LETTER  
REPLY BRIEF**

**X** BY ELECTRONIC SERVICE [Code Civ. Proc sec. 1010.6; CRC 2.251] by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system from crussavage@mofo.com to the email addresses stated on the attached service list per instructions of the Court and in accordance with Code of Civil Procedure section 1010.6.

**X** BY U.S. MAIL [Code Civ. Proc sec. 1013(a)] by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as follows, for collection and mailing at Morrison & Foerster LLP, at 425 Market St., San Francisco, California 94105-2482 in accordance with Morrison & Foerster LLP's ordinary business practices.

I am readily familiar with Morrison & Foerster LLP's practice for collection and processing of correspondence for mailing with the United States Postal Service, and know that in the ordinary course of Morrison & Foerster LLP's business practice the document described above will be deposited with the United States Postal Service on the same date that it is placed at Morrison & Foerster LLP with postage thereon fully prepaid for collection and mailing.

**X** BY FACSIMILE [Code Civ. Proc sec. 1013(e)] by sending a true copy from Morrison & Foerster LLP's facsimile transmission telephone number to the fax number(s) set forth below, or as stated on the attached service list. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.

I am readily familiar with Morrison & Foerster LLP's practice for sending facsimile transmissions, and know that in the ordinary course of Morrison & Foerster LLP's business practice the document described above will be transmitted by facsimile on the same date that it is placed at Morrison & Foerster LLP for transmission.

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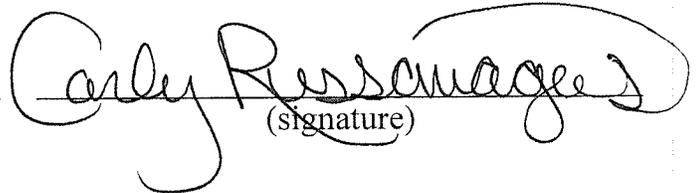
Service via Email, Facsimile  
and Mail

Amicus Curiae

I declare under penalty of perjury under the laws of the State of  
California that the foregoing is true and correct.

Executed at San Francisco, California, this 6th day of January, 2012.

Carly Russavage  
(typed)

  
(signature)