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March 10, 2014

Leah C. Aden, Esquire
Assistant Counsel
NAACP Legal Defense and Educational Fund
40 Rector Street, 5th Floor
New York, NY 10006-1738

Re: *City of Beaufort—Your letter of February 19, 2014*

Dear Ms Aden:

I am responding to your letter of February 19, 2014.

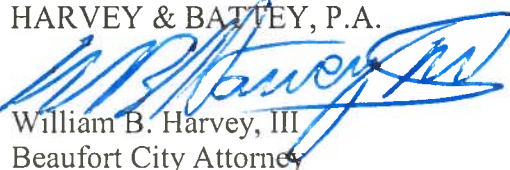
In my letter of December 11, 2013, we requested that you send to us for our review and consideration any proposed map or other demographic information which would satisfy the *Gingles* pre-conditions, particularly that of contiguity. Your letter states that there are at least two variations of a four single-member district plan, and a six single-member district plan, both of which satisfy the condition of contiguity. We would again request that you send to us the proposed map(s) or other demographic information of these proposed plans for our review and analysis.

As your letter correctly notes, a change in the number or method of election of City Council additionally requires a referendum vote of a majority of registered City voters. It is necessary that Council has a full analysis and understanding of the various options before deciding whether to commit this issue to a referendum.

Additionally, as Mayor Keyserling has earlier stated, we are willing to sit down with you and/or members of the local Branch to openly discuss these concerns.

I reiterated that Beaufort City Council is not, nor has it ever been, a Council of exclusion, either in body or in action. We welcome the input of every citizen into the functioning of City Council and its committees, commissions and other appointed bodies. I look forward to receiving this information and to further discussion with you concerning this matter. Please call me at any time.

Very truly yours,
HARVEY & BATTEY, P.A.



William B. Harvey, III
Beaufort City Attorney

WBHIII/lpb
cc: Scott Dadson, City Manager
Mayor and Council