

## Annotated Bibliography

### Primary Sources

Boehm, Theodore. Telephone interview. Theodore Boehm was the lawyer for the Indiana Democrats during the Davis v. Bandemer case. I spoke with him by phone pretty early on in my project, where my working thesis was about justiciability so we really talked a lot about the justiciability issue in Davis and about what impact he thought Davis v. Bandemer had on partisan gerrymandering cases today. Mr. Boehm was easy to talk to and answered all my questions completely and in a way I could understand. I recorded his interview and used a quote on my "Moving Forward" page.

"The Gerry-Mander." *The Boston Gazette* [Boston], 1812. *Massachusetts Historical Society*, [www.masshist.org/database/viewer.php?item\\_id=1765&mode=large&img\\_step=1&](http://www.masshist.org/database/viewer.php?item_id=1765&mode=large&img_step=1&). Accessed 13 Oct. 2017. This is the newspaper article that first published a picture of the gerrymander salamander in 1812. This is a crucial source to my project because it was this article that coined the term 'gerrymander' which is still used today.

"Justice Byron White Case Files." Library of Congress, Washington D.C. Memos. To get these files, I contacted the Manuscript Division at the Library of Congress and asked them if they could scan Byron White's personal correspondences from Davis v. Bandemer and send them to me. I already had Lewis Powell's files and handwritten memos and they were fascinating. Since White wrote the majority opinion, I wanted to get his. In two days, I received 37 pages of White's memos. Most of the letters and memos were to White, but a couple were from him. A few days later, I spoke with Palma Strand, White's law clerk and she told me that White had shredded nearly all his personal documents after

Davis v. Bandemer, which explained why I received no handwritten correspondences from the Library of Congress. Nonetheless, White's memos were extremely useful for my questions page, and I used several.

"Justice Lewis Powell Case Files." Washington and Lee University School of Law, Lexington.

Memos. I stumbled upon these case files by accident and it was the best accident I ever made. These files contain 366 pages of personal notes to and from his clerk and other Justices, memos, maps, and handwritten commentary on the case. They provided invaluable insight to the complexity of the Davis v. Bandemer case and prompted me to search out Justice White's clerk and case files.

*1981 Republican Redistricting Plan for Indiana House.* 1986. Case files of Justice Lewis Powell, Washington and Lee University School of Law, Lexington. Map. This map is a primary source from Justice Powell's case files. It shows the House districts in 1981.

*1986 Supreme Court.* Palma J. Strand. This is a photograph given to me by Palma Strand, Justice White's law clerk during the case.

Strand, Palma J. "Strand Davis v. Bandemer Bench Memo." Working paper. After my conversation with Palma Strand, Justice White's law clerk during Davis v. Bandemer, she passed me some of her personal documents from the case including this bench memo written to Justice White. It was interesting for me to see how clerks help the Justices prepare for trial.

Strand, Palma Joy. Telephone interview. 12 Jan. 2018. Palma Strand served as Justice White's law clerk during Davis v. Bandemer. She was intimately involved with crafting his majority and plurality opinions. After talking with her, I modified my thesis because she

opened my eyes to some deeper levels of compromise in the case. She also emphasized the importance White/Brennan gave to this case, how their opinion was both backward and forward looking, how she thought it was the Supreme Court at its best and how without Bandemer the Court would not be reviewing partisan gerrymandering cases today. Professor Strand's insight was invaluable. Since all 4 of the plurality Justices have passed, this was as close as I could get to a first-hand account. I talked with her via telephone and she re-created the facts and feel of working on this case. She also forwarded me a bench memo she wrote during Bandemer, an unedited draft of an opinion article for Slate and some personal reflections of her time working with White on Bandemer. These more personal recollections were helpful as White had shredded all his personal communications regarding his cases, preferring to speak only through the official court documents. I recorded this interview and used an audio segment on my "Court of Compromise" page.

Tisdale, Elkanah. *The Gerry-Mander*. 26 Mar. 1812. *Library of Congress*, [blogs.loc.gov/law/2017/02/elbridge-gerry-and-the-monstrous-gerrymander/](https://blogs.loc.gov/law/2017/02/elbridge-gerry-and-the-monstrous-gerrymander/). This was the first primary source I found. It's a drawing ridiculing Elbridge Gerry's district of Essex in 1812. This image was used both on my title page to show how partisan gerrymandering cartoons evolved over time and on my History of Gerrymandering page.

United States, Supreme Court. *Davis v. Bandemer*. Oyez, [www.oyez.org/cases/1985/84-1244](http://www.oyez.org/cases/1985/84-1244).

Accessed 18 Dec. 2017. Oyez was useful for helping me understand the bare bones of *Davis v. Bandemer*. They gave a nice summary of the questions and answers to the case, as well as images of which Justice sided with which opinion. This was where I found the

entire Oral Argument recorded, which was essential in giving my Davis v. Bandemer page a window to the past.

---, ---. *Davis v. Bandemer*. 30 June 1986. 92 S. Ct. 2797-840. Reading the Supreme Court Reporter was probably one of the most difficult parts of my project. The language used in the official documents is challenging for a 14-year-old. The Davis v. Bandemer case is separated by the plurality, concurring, and dissenting opinions for each question the Court answers. Each opinion also cites previous cases and rationale; it can get very complicated and it's not really written in the way normal people speak or write. I read a lot of commentary on Davis v. Bandemer and talked with teachers, lawyers, and parents to help me understand the case. With that help, I was able to go back and actually understand most parts of the Davis v. Bandemer Supreme Court Reporter. I mostly focused on White's majority and plurality opinions in the case.

---, ---. *Gill v. Whitford*. Oyez, [www.oyez.org/cases/2017/16-1161](http://www.oyez.org/cases/2017/16-1161). Accessed 18 Dec. 2017. This site gave a very good explanation about the current Gill v. Whitford case including a summary, the questions, the lawyers for each side, and the nine Justices. It really helped me understand the case that will be ruled on in the Supreme Court this summer. I also realized how similar Gill v. Whitford is to Davis v. Bandemer, both a Republican redistricting plan that Democrats took to the District Court. Both District Courts ruled in favor of the Democrats and both Republicans appealed the case to the Supreme Court.

---, ---. *Vieth v. Jubelirer*. Oyez, [www.oyez.org/cases/2003/02-1580](http://www.oyez.org/cases/2003/02-1580). Accessed 3 Jan. 2018. No. 02-1580. Oyez is extremely useful in explaining cases simply and quickly. I wanted a little background knowledge on the Vieth v. Jubelirer case after reading that it was the

first partisan gerrymandering Supreme Court case after *Davis v. Bandemer* and this was perfect. I really liked seeing the visuals of which Justice had which opinion on each question.

*Worcester Count : Essex County. Norman B. Leventhal Map Center,*

[collections.leventhalmap.org/search/commonwealth:zg94j274b](https://collections.leventhalmap.org/search/commonwealth:zg94j274b). This image was used in my History of Gerrymandering page to show what Gerry's district looked like.

*Worcester County : Essex County. Boston, The Weekly Messenger, 1812. Norman B. Leventhal*

*Map Center Collection, Boston Public Library. Map. This is a map of how Essex County, MA was redistricted by Elbridge Gerry in 1812. It was really interesting to see the shape of Gerry's district without the wings, head, and hooked feet of the Gerrymander*

*Salamander. I used a part of the article in my history page to show how much people were disgusted by Gerry's district. Looking at this newspaper was incredible. Partisan redistricting has been an issue since the founding of our country.*

## **Secondary Sources**

*113th U.S. Congress House Districts. Wikimedia Commons, [commons.wikimedia.org/wiki/File:](https://commons.wikimedia.org/wiki/File:113th_US_Congress_House_districts_color.svg)*

*113th\_US\_Congress\_House\_districts\_color.svg. This image was used on my Gerrymandering Explained page to show Congressional voting districts*

*Benisek v. Lamone. SCOTUS Blog, [www.scotusblog.com/case-files/cases/benisek-v-lamone/](http://www.scotusblog.com/case-files/cases/benisek-v-lamone/).*

*This image was pulled from Benisek v. Lamone's case page on SCOTUS Blog. I used it in my Moving Forward page.*

*Byron White. National Constitution Center*, [constitutioncenter.org/blog/justice-byron-white-a-retrospective](http://constitutioncenter.org/blog/justice-byron-white-a-retrospective). This photo was used in the Court of Compromise page.

*The Competitive Game of Gerry-mandering. Wong for Congress*, [wongforcongress.com/gerrymandering-stacking-deck-every-election-must-stop-now/](http://wongforcongress.com/gerrymandering-stacking-deck-every-election-must-stop-now/). This image was used on my title page to show how partisan gerrymandering cartoons have evolved over time.

Davis, Jennifer. "Elbridge Gerry and the Monstrous Gerrymander." *Library of Congress*, 10 Feb. 2017, [blogs.loc.gov/law/2017/02/elbridge-gerry-and-the-monstrous-gerrymander/](https://blogs.loc.gov/law/2017/02/elbridge-gerry-and-the-monstrous-gerrymander/). Accessed 25 Sept. 2017. This is a great article about how the Gerrymander Salamander came to be. Lot's of articles today talk about the recent cases of gerrymandering but with this article, I learned that there's a ton of history behind gerrymandering. Also, I now know that the Gerrymander Salamander is housed in the Library of Congress.

*Elbridge Gerry. Wikipedia*, [en.wikipedia.org/wiki/Elbridge\\_Gerry](https://en.wikipedia.org/wiki/Elbridge_Gerry). This image was used in my History of Gerrymandering page to show how the word "gerrymander" was coined.

"Engineering Elections Without Bias | Brian Olson | TEDxCambridge." *YouTube*, uploaded by TEDx Talks, 26 June 2016, [www.youtube.com/watch?v=EC3L2ISSONQ](https://www.youtube.com/watch?v=EC3L2ISSONQ). Accessed 2 Oct. 2017. This video is a little dry but contains good information. This man invented a software use 2010 census data to make districts more compact and avoid gerrymandering. This is one of the many standards proposed to the courts to measure how much partisan gerrymandering is too much.

Engstrom, Erik J. *Partisan Gerrymandering and the Construction of the American Democracy*. 2013. This is the only book I found about partisan gerrymandering before the 1960s. It's a complicated book with lots of mathematical analysis about partisan redistricting and

voting patterns in the early part of our country's history. The intro and summary chapters were useful to me to get a sense of early gerrymandering. Engstrom holds that partisan redistricting was even more unregulated early on in history, both Democrats and Republicans used it to their advantage, and at times it changed the outcome of elections. The book also has an extensive bibliography that directed me to some other sources.

*Florida's 5th District. The Washington Post*, [www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/?utm\\_term=](http://www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/?utm_term=)

691415667fa8. This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

"Gerrymandering, Explained." *YouTube*, uploaded by Washington Post, 14 Nov. 2017, [www.youtube.com/watch?v=bGLRJ12uqmk](http://www.youtube.com/watch?v=bGLRJ12uqmk). Accessed 5 Jan. 2018. This is a great video that explains gerrymandering simply, but completely. The visuals really help show how districts can be manipulated by the controlling party for partisan gain.

*Gerrymandering Has Led to Some Oddly Shaped Congressional Districts in Wisconsin*. ONTD Political. This image was used on my title page to show how partisan gerrymandering cartoons have evolved over time.

*Gerrymandering 101. Southern Coalition for Social Justice*, [www.southerncoalition.org/gerrymandering-101/](http://www.southerncoalition.org/gerrymandering-101/). This image was used on my title page to show how partisan gerrymandering cartoons have evolved over time.

Gerry's district in Massachusetts. *All About Redistricting*, [redistricting.ils.edu/what.php](http://redistricting.ils.edu/what.php). This image was used in my History of Gerrymandering page to show where Gerry's district was in Massachusetts.

*Gill v. Whitford*. *SCOTUS Blog*, [www.scotusblog.com/case-files/cases/gill-v-whitford/](http://www.scotusblog.com/case-files/cases/gill-v-whitford/). This is pulled from the *Gill v. Whitford* description on SCOTUS Blog. This was used on my Moving Forward page.

*Gill v. Whitford: Gerrymandering at the Supreme Court*. *Brennan Center for Justice*, [www.brennancenter.org/issues/whitford](http://www.brennancenter.org/issues/whitford). This image shows the Justices who will try the Supreme Court case *Gill v. Whitford*. I used this on my Moving Forward page.

Grofman, Bernard. *Political Gerrymandering and the Courts*. New York, 1990, [books.google.com/books?id=NsvRbk\\_txaIC&printsec=frontcover&dq=google+books+gerrymandering&hl=en&sa=X&ved=0ahUKEwjdi\\_ujPXWAhUB2iYKHSu0C\\_kQ6AEIKzAB#v=onepage&q=google%20books%20gerrymandering&f=false](https://books.google.com/books?id=NsvRbk_txaIC&printsec=frontcover&dq=google+books+gerrymandering&hl=en&sa=X&ved=0ahUKEwjdi_ujPXWAhUB2iYKHSu0C_kQ6AEIKzAB#v=onepage&q=google%20books%20gerrymandering&f=false). Accessed 16 Oct. 2017. This book was complicated but pages 1-9 provided good commentary that helped me understand the *Davis v. Bandemer* case and its role in history.

*Harry Blackmun*. *Library of Congress*, [www.loc.gov/rr/mss/blackmun/blackmun-ex-bib.html](http://www.loc.gov/rr/mss/blackmun/blackmun-ex-bib.html). This image was used on the Court of Compromise page.

Hess, Michael A. "Beyond Justiciability: Political Gerrymandering after *Davis v. Bandemer*." *Campbell Law Review*, vol. 9, no. 2, Spring 1987, pp. 207-54, [scholarship.law.campbell.edu/cgi/viewcontent.cgi?article=1140&context=clr](http://scholarship.law.campbell.edu/cgi/viewcontent.cgi?article=1140&context=clr). Accessed 28 Oct. 2017. This is the most useful written source that helped me understand the *Davis v. Bandemer* case. It goes through all the important parts of the case and provides analysis written in language that's more natural and easier to understand. After reading this, I could go back and make more sense of the actual case.

Ingraham, Christopher. "This is Actually What America Would Look Like Without Gerrymandering." *The Washington Post*. *The Washington Post*, [www.washingtonpost.com/news/wonk/wp/2016/01/13/this-is-actually-what-america-would-look-like-without-gerrymandering/?utm\\_term=.727b7934e014](http://www.washingtonpost.com/news/wonk/wp/2016/01/13/this-is-actually-what-america-would-look-like-without-gerrymandering/?utm_term=.727b7934e014). Accessed 22 Sept. 2017. The visuals of this article are amazing. It shows us how districts might look had the power of redistricting not been given to the states legislatures. This is a model more similar to how Iowa has decided to make their districts but it's not the norm.

Lein, Art. Illustrations from *Gill v. Whitford*. *SCOTUS Blog*, [www.scotusblog.com/case-files/cases/gill-v-whitford/](http://www.scotusblog.com/case-files/cases/gill-v-whitford/). These are a set of four illustrations done by an artist during *Gill v. Whitford* oral arguments. These were used in my Moving Forward page.

Levitt, Justin. "All about Redistricting." *All about Redistricting*, Professor Justin Levitt, [redistricting.ils.edu/index.php](http://redistricting.ils.edu/index.php). Accessed 4 Jan. 2018. This website has good background information on the who, what, when, where, and why of redistricting. Professor Levitt has done an amazing job with the graphics and explanations on this site. I'd recommend it as a first stop for anyone who wants to learn more about redistricting and partisan gerrymandering. I used some of the information for nuts and bolts explanations on my website.

Liptak, Adam, and Michael D. Shear. "Kennedy's Vote Is in Play on Voting Maps Warped by Politics." *The New York Times* [New York City], 3 Oct. 2017. *The New York Times*, [www.nytimes.com/2017/10/03/us/politics/gerrymandering-supreme-court-wisconsin.html](http://www.nytimes.com/2017/10/03/us/politics/gerrymandering-supreme-court-wisconsin.html). Accessed 21 Nov. 2017. This article is about gerrymandering today and was useful for my moving forward section. Specifically, the importance of Justice

Kennedy's vote in the the Gill v. Whitford case. Justice Kennedy was the swing vote in Vieth v. Jubelirer (2004). With a court that had become more polarized since Bandemer, he held on to the plurality's compromise position. Justice Kennedy will likely be the swing vote in Gill v. Whitford.

M., S. "The Supreme Court Takes up a Second Gerrymandering Case." *The Economist*, 11 Dec. 2017, [www.economist.com/blogs/democracyinamerica/2017/12/preparing-strike-down](http://www.economist.com/blogs/democracyinamerica/2017/12/preparing-strike-down). Accessed 18 Dec. 2017. This article was useful for my moving forward section. It was a clearly written article explaining about the Benisek v. Lamone case. I knew about Gill v. Whitford, the Wisconsin partisan gerrymandering case, but not this one.

*Maryland's 3rd District. Alumn.us*, [alumn.us/maryland-gerrymandering-map.html](http://alumn.us/maryland-gerrymandering-map.html). This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

*Maryland's 4th District. Sydney Morning Herald*, [www.smh.com.au/world/can-the-supreme-court-straighten-out-americas-misshapen-democracy-20170623-gwwxqm.html](http://www.smh.com.au/world/can-the-supreme-court-straighten-out-americas-misshapen-democracy-20170623-gwwxqm.html). This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

*Maryland's 7th District. Wikipedia*, [en.wikipedia.org/wiki/Maryland%27s\\_7th\\_congressional\\_district](http://en.wikipedia.org/wiki/Maryland%27s_7th_congressional_district). This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

*Massachusetts 7th District. Wikipedia*, [en.wikipedia.org/wiki/Massachusetts%27s\\_7th\\_congressional\\_district](http://en.wikipedia.org/wiki/Massachusetts%27s_7th_congressional_district). This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

Miller, Greg. "The Map That Popularized the Word 'Gerrymander.'" *National Geographic*. *National Geographic*, [news.nationalgeographic.com/2017/06/map-gerrymander-redistricting-history-newspaper/](https://news.nationalgeographic.com/2017/06/map-gerrymander-redistricting-history-newspaper/). Accessed 20 Sept. 2017. This National Geographic article provided information about historical partisan gerrymandering. The article is written clearly, with good visuals, and is easy to understand.

Newkirk, Van R., 11. "The Supreme Court Takes on Partisan Gerrymandering." *The Atlantic*. *The Atlantic*, [www.theatlantic.com/politics/archive/2017/06/supreme-court-gill-whitford-wisconsin-gerrymandering/530769/](http://www.theatlantic.com/politics/archive/2017/06/supreme-court-gill-whitford-wisconsin-gerrymandering/530769/). Accessed 25 Sept. 2017. This was the article I read on Gill v. Whitford, the first partisan gerrymandering case since 2004. It gave me interesting background information and laid it out in a way anyone can understand.

*North Carolina's 12th District*. *Wikipedia*, [en.wikipedia.org/wiki/North\\_Carolina%27s\\_12th\\_congressional\\_district](https://en.wikipedia.org/wiki/North_Carolina%27s_12th_congressional_district). This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

*North Carolina's 1st District*. *The Washington Post*, [www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/?utm\\_term=.691415667fa8](http://www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/?utm_term=.691415667fa8). This image was used in the gallery of gerrymandered districts on the Tools of Gerrymandering page.

*Packing and Cracking*. *Quanta Magazine*, [www.quantamagazine.org/the-mathematics-behind-gerrymandering-20170404/](http://www.quantamagazine.org/the-mathematics-behind-gerrymandering-20170404/). This image was used in my Tools of Partisan Gerrymandering page to illustrate packed and cracked districts.

*Palma J. Strand. Creighton University School of Law, law.creighton.edu/faculty-directory-profile/593/palma-strand.* This is an image of Palma J, Strand, who was Justice White's law clerk during *Davis v. Bandemer*. This image was used on my Interviews page.

*Pennsylvania's 7th District. witf.org, www.witf.org/news/2018/01/pennsylvania-gop-take-gerrymandering-case-to-us-high-court.php.* This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

*Since You're so Good with Maps... Reclaim the American Dream, reclaimtheamericandream.org/2015/07/green-light-for-voter-reform-of-gerrymandering/.* This image was used on my title page to show how partisan gerrymandering cartoons have evolved over time.

Sloan, Cliff, and Michael Waldman. "History Frowns on Partisan Gerrymandering." *The Washington Post. Washington Post, www.washingtonpost.com/opinions/history-frowns-on-partisan-gerrymandering/2017/10/01/a6795fca-a491-11e7-ade1-76d061d56efa\_story.html?utm\_term=.6d1cb39a138f.* Accessed 2 Oct. 2017. This article linked to primary sources about early reactions to partisan gerrymandering. I didn't end up using these quotes but it gave me a feel for how people voiced their criticism historically. Then, like now, no one likes being on the losing side of a partisan gerrymander.

Strand, Palma Joy. "Time to Protect Our Democracy." *Slate.com, www.slate.com/articles/news\_and\_politics/jurisprudence/2017/09/if\_anthony\_kennedy\_follows\_precedent\_he\_ll\_strike\_down\_partisan\_gerrymandering.html.* Accessed 20 Sept. 2017. This is an article written by Palma Strand, Justice White's law clerk during *Davis v. Bandemer*. She provided deep analysis about the importance of

Davis v. Bandemer and how the case has been a placeholder for the Court's involvement in partisan redistricting. She goes on to explain the importance of Justice Kennedy's vote in Gill v. Whitford; with a 4-4 divided Court, his vote could either make partisan gerrymandering non-justiciable, revoking Davis v. Bandemer, or it could rule the first partisan gerrymandering case unconstitutional in the Supreme Court.

*Texas's 35th District. The Washington Post*, [www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/?utm\\_term=.691415667fa8](http://www.washingtonpost.com/news/wonk/wp/2014/05/15/americas-most-gerrymandered-congressional-districts/?utm_term=.691415667fa8). This image was used in the gallery of gerrymandered districts on the Tools of Partisan Gerrymandering page.

*Theodore Boehm. courts.in.gov*, [www.in.gov/judiciary/citc/2833.htm](http://www.in.gov/judiciary/citc/2833.htm). This is an image of Theodore Boehm, who argued Davis v. Bandemer for the Democrats. I used this in my Interviews page.

*Thurgood Marshall. Huffington Post*, [www.huffingtonpost.com/2013/10/02/this-day-in-history-thurgood-marshall-sworn-in\\_n\\_4029758.html](http://www.huffingtonpost.com/2013/10/02/this-day-in-history-thurgood-marshall-sworn-in_n_4029758.html). This image was used on the Court of Compromise page.

United States, Congress. *CRS Annotated Constitution Article 1*. Government Printing Office. *Cornell University Law School*, [www.law.cornell.edu/anncon/html/art1frag14\\_user.html#art1\\_sec2cl1](http://www.law.cornell.edu/anncon/html/art1frag14_user.html#art1_sec2cl1). Accessed 4 Jan. 2018. This report is mostly about the Court's historical role in malapportionment gerrymandering. There was one annotated comment that gave me some new insight that although Davis v. Bandemer had opened the door to compromise, the bar has been set so high that the Court hasn't been able to walk through it.

*Wake Voters Sue over New County Commission Districts. Southern Coalition for Social Justice,*

[www.southerncoalition.org/wake-voters-sue-over-new-county-commission-districts/](http://www.southerncoalition.org/wake-voters-sue-over-new-county-commission-districts/).

This image was used on my title page to show how partisan gerrymandering cartoons have evolved over time.

"When Is Gerrymandering Unconstitutional?" *YouTube*, uploaded by NPR and Nina Totenberg, 17 Oct. 2017, [www.youtube.com/watch?v=ADEflXCXouU](http://www.youtube.com/watch?v=ADEflXCXouU). Accessed 5 Jan. 2018. Davis v. Bandemer laid out a compromise: only extreme partisan gerrymandering is unconstitutional. Making good on this compromise requires a standard that says when partisan gerrymandering becomes extreme. This video lays out the 'how much is too much issue.

*William Blackmun. Wikimedia Commons, commons.wikimedia.org/wiki/*

*File:US\_Supreme\_Court\_Justice\_William\_Brennan\_-\_1976\_official\_portrait.jpg*. This image was used on the Court of Compromise page.