

Title: Gray v. Sanders 372 U.S. 368 (1963)

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Gray, along with *WESBERRY V. SANDERS* (1964), was a way-station between *BAKER V. CARR* (1962) (legislative districting presents a justiciable controversy) and *REYNOLDS V. SIMS* (1964) (the ONE PERSON, ONE VOTE principle governs the issue). In *Gray*, the Supreme Court, 8–1, invalidated Page 1228 | [Top of Article](#) Georgia's "county unit system," which weighed rural votes more heavily than urban votes in PRIMARY ELECTIONS for statewide offices. The state, said Justice WILLIAM O. DOUGLAS, was the electoral unit; within that unit, EQUAL PROTECTION demanded the principle of one person, one vote. Justice JOHN MARSHALL HARLAN dissented, drawing an analogy to the ELECTORAL COLLEGE.

KENNETH L. KARST
(1986)

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