

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

EVAN MILLIGAN, et al.,

*Plaintiffs,*

vs.

JOHN H. MERRILL, et al.,

*Defendants.*

No. 2:21-cv-01530-AMM

**PLAINTIFFS' SECOND EVIDENTIARY SUBMISSION**

In further support of their motion for a preliminary injunction and following the production of Exhibits 1 to 5 in Plaintiffs' First Evidentiary Submission (Doc. 68), Plaintiffs hereby submit the following additional Exhibits as set out below:

1. Exhibit 6 – 2021 Redistricting Plans Comparative by District Analysis
2. Exhibit 7 – Hinaman, R. Deposition Transcript (Dec. 9, 2021)
3. Exhibit 8 – Douglas, S. Declaration
4. Exhibit 9 – Simelton, B. Declaration
5. Exhibit 10 – Dowdy, S. Declaration
6. Exhibit 11 – Milligan, E. Declaration
7. Exhibit 12 – Jackson, L. Declaration
8. Exhibit 13 – Oct. 26, 2021 Reapportionment Comm. Transcript

9. Exhibit 14 –Hall, L. Declaration

DATED this 15th day of December 2021.

/s/ Deuel Ross

Deuel Ross\*

NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.

700 14th Street N.W. Ste. 600

Washington, DC 20005

(202) 682-1300

dross@naacpldf.org

Leah Aden\*

Stuart Naifeh\*

Kathryn Sadasivan (ASB-517-E48T)

Brittany Carter\*

NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

(212) 965-2200

laden@naacpldf.org

snaifeh@naacpldf.org

Shelita M. Stewart\*

Jessica L. Ellsworth\*

HOGAN LOVELLS US LLP

555 Thirteenth Street, NW

Washington, D.C. 20004

(202) 637-5600

shelita.stewart@hoganlovells.com

David Dunn\*

HOGAN LOVELLS US LLP

390 Madison Avenue

New York, NY 10017

(212) 918-3000

david.dunn@hoganlovells.com

Michael Turrill\*

Harmony A. Gbe\*

HOGAN LOVELLS US LLP

1999 Avenue of the Stars

Suite 1400

Los Angeles, CA 90067

(310) 785-4600

michael.turrill@hoganlovells.com

harmony.gbe@hoganlovells.com

Respectfully submitted,

/s/ Sidney M. Jackson

Sidney M. Jackson (ASB-1462-K40W)

Nicki Lawsen (ASB-2602-C00K)

WIGGINS CHILDS PANTAZIS

FISHER & GOLDFARB, LLC

301 19th Street North

Birmingham, AL 35203

Phone: (205) 341-0498

sjackson@wigginschilds.com

nlawsen@wigginschilds.com

/s/ Davin M. Rosborough

Davin M. Rosborough\*

Julie Ebenstein\*

AMERICAN CIVIL LIBERTIES

UNION FOUNDATION

125 Broad St.

New York, NY 10004

(212) 549-2500

drosborough@aclu.org

jebenstein@aclu.org

/s/ LaTisha Gotell Faulks

LaTisha Gotell Faulks (ASB-1279-I63J)

Kaitlin Welborn\*

AMERICAN CIVIL LIBERTIES UNION OF  
ALABAMA

P.O. Box 6179

Montgomery, AL 36106-0179

(334) 265-2754

tgfaulks@aclualabama.org

kwelborn@aclualabama.org

Blayne R. Thompson\*

HOGAN LOVELLS US LLP

609 Main St., Suite 4200

Houston, TX 77002

(713) 632-1400

blayne.thompson@hoganlovells.com

*Attorneys for Plaintiffs*

Anthony Ashton\*  
Anna Kathryn Barnes\*  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE  
(NAACP)  
4805 Mount Hope Drive  
Baltimore, MD 21215  
(410) 580-5777  
aashton@naacpnet.org  
abarnes@naacpnet.org

*Attorneys for Plaintiff Alabama State Conference of the NAACP*

\* Admitted *Pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record.

This the 15th day of December 2021.

/s/ Deuel Ross

COUNSEL FOR PLAINTIFFS