

**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

BOBBY SINGLETON, et al.,

Plaintiffs,

vs.

JOHN H. MERRILL, et al.,

Defendants.

No. 2:21-cv-01291-AMM

JOINT PRETRIAL REPORT

The *Milligan* Plaintiffs, *Singleton* Plaintiffs, and Defendants Merrill, McClendon, and Pringle (the “Parties”) hereby submit the following joint pretrial report as ordered by the Court on November 23.

I. List of Witnesses Deposed

The following three witnesses were deposed during the pre-hearing discovery period:

- Randy Hinaman
- Sen. James McClendon
- Rep. Chris Pringle

II. List of Live Witnesses for Preliminary Injunction Hearing

The list provided below sets out the witnesses that the parties currently are likely to call for live testimony during the hearing. The chart also designates whether the witness serves as a fact or expert witness, and the party or parties who intend to call the witness. The Parties reserve the right to call witnesses or introduce exhibits listed by other parties.

Witnesses the Parties will Call		
Witness	Type	Party/Parties calling
Evan Milligan	Fact	<i>Milligan</i> Plaintiffs
Shalela Dowdy	Fact	<i>Milligan</i> Plaintiffs
Dr. Kosuke Imai	Expert	<i>Milligan</i> Plaintiffs
Dr. Ryan Williamson	Expert	<i>Milligan</i> Plaintiffs
Dr. Moon Duchin	Expert	<i>Milligan</i> Plaintiffs
Dr. Baodong Liu	Expert	<i>Milligan</i> Plaintiffs
Dr. Joseph Bagley	Expert	<i>Milligan</i> Plaintiffs
Dr. Natalie Davis	Expert	<i>Singleton</i> Plaintiffs
Bobby Singleton	Fact	<i>Singleton</i> Plaintiffs
Randy Hinaman	Fact	Defendants

Rep. Chris Pringle	Fact	Defendants
Sen. Jim McClendon	Fact	Defendants
Dr. M.V. Hood III	Expert	Defendants
Thomas Bryan	Expert	Defendants
List of Witnesses the Parties May Call		
Randy Hinaman	Fact	<i>Milligan</i> Plaintiffs
Rep. Chris Pringle	Fact	<i>Milligan</i> Plaintiffs
Sen. Jim McClendon	Fact	<i>Milligan</i> Plaintiffs
Bradley Byrne	Fact	Defendants
Jo Bonner	Fact	Defendants
Mary McIntyre, M.D.	Fact	Defendants
Clay Helms	Fact	Defendants/ <i>Milligan</i> Plaintiffs
Jim Blacksher	Fact	<i>Singleton</i> Plaintiffs
Rodger Smitherman	Fact	<i>Singleton</i> Plaintiffs
Eddie Billingsley	Fact	<i>Singleton</i> Plaintiffs
Leonette Slay	Fact	<i>Singleton</i> Plaintiffs
Darryl Andrews	Fact	<i>Singleton</i> Plaintiffs
Andrew Walker	Fact	<i>Singleton</i> Plaintiffs

III. List of Stipulated Exhibits

The Parties hereby stipulate to the admission of the following exhibits. This list does not include any exhibits the propounding party intends to use solely as a demonstrative or for impeachment purposes and for which they do not intend to seek admission into evidence.

Exh. #	Description	Bates/ECF Doc #
1	Expert Report of Kosuke Imai	68-4
2	Expert Report of Ryan Williamson	68-3
3	Expert Report of Moon Duchin	68-5

4	Expert Report of Baodong Liu	68-1
5	Expert Report of Joseph Bagley	68-2
6	Rebuttal Report of Kosuke Imai	76-3
7	Rebuttal Report of Moon Duchin	76-4
8	Rebuttal Report of Baodong Liu	76-1
9	Rebuttal Report of Joseph Bagley	76-2
10	Congressional District Comparison 2011/2021	RC 000002
11	Transcript of Randy Hinaman Deposition & exhibits	N/A
12	Transcript of Rep. Pringle Deposition & exhibits	N/A
13	Transcript of Sen. McClendon Deposition & exhibits	N/A
14	Declaration of Scott Douglas	70-3
15	Declaration of Benard Simelton	70-4
16	Declaration of Shalela Dowdy	70-5
17	Declaration of Evan Milligan	70-6
18	Declaration of Letetia Jackson	70-7
19	Transcript of Oct. 26, 2021 Hearing of Reapportionment Committee	70-8
20	Declaration of Sen. Laura Hall	70-9
21	2011 Alabama congressional district map	N/A
22	2021 Alabama congressional plan map	RC 000553
23	2021 Alabama congressional plan map book	RC 000556
24	2021 Reapportionment Public Hearings list	N/A
25	Ala. HB 621 (May 2011)	SOS000076
26	2011 Legislative Reapportionment Comm. Guidelines	SOS002410
27	2021 Proposed Reapportionment Comm. Guidelines comparison handout	RC 044470
28	2021 Reapportionment Comm. Redistricting Guidelines	RC 044593
29	Talking Points for Likely Issues	RC 045524
30	Proposed Ala. Senate Districts Functionality Examination	RC 044600
31	“House approves congressional redistricting plan,” Montgomery Advertiser (6/2/2011)	SOS001921

32	June 29, 2021 email from Rep. Hall to D. Overton	RC 045712-14
33	Decl. of Randy Hinaman from <i>ALBC</i> case	Hinaman Dep. Ex. 4
34	Congressional plans introduced in 2021 special session	RC 000007
35	Exhibit M-1 to William Cooper expert report in <i>Caster v. Merrill</i> , No. 2:21-cv-01536-AMM	<i>Caster</i> , ECF No. 48-46
36	Exhibit M-2 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-47
37	Exhibit N-1 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-48
38	Exhibit N-2 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-49
39	Exhibit O-1 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-50
40	Exhibit O-2 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-51
41	Exhibit P-1 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-52
42	Exhibit P-2 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-53
43	Exhibit Q-1 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-54
44	Exhibit Q-2 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-55
45	Exhibit R-1 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-56
46	Exhibit R-2 to Cooper report in <i>Caster</i>	<i>Caster</i> , ECF No. 48-57
47	Stipulations of Fact	ECF No. 47
48	Natalie Davis Report	ECF No. 56-1
49	Natalie Davis Rebuttal Report	ECF No. 60-1
50	Alabama State House Hearing Transcript	RC 044681
51	Coastal Alabama Community College–Fairhope Hearing Transcript	RC 044818
52	Gadsden State Community College (Ayers) Hearing Transcript	RC 044990
53	Jefferson State Community College–Hoover Hearing Transcript	RC 045074
54	Lawson State Community College Hearing Transcript	RC 045111
55	Lurleen B. Wallace Community College Hearing Transcript	RC 045156
56	Northeast Alabama Community College Hearing Transcript	
57	Northwest Shoals Community College Hearing Transcript	RC 045231
58	All Alabama Congressional Maps	ECF No. 57-7
59	Enacted 2021 Plan Map (Letter Size)	RC 000554

60	Enacted 2021 Plan Population Summary	RC 000649
61	Enacted 2021 Plan Population Summary (AP)	RC 000651
62	Enacted 2021 Plan Population Summary (VAP)	RC 000652
63	Enacted 2021 Plan District Statistics	RC 000537
64	Enacted 2021 Plan Communities of Interest Splits	RC 000372
65	Jefferson D7 Precincts	
66	MGM D7 Precincts	
67	Tuscaloosa D7 Precincts	
68	Singleton Plan 1 Map (Large)	RC 022544
69	Singleton Plan 1 Communities of Interest Splits	RC 022393
70	Singleton Plan 2 (Smaller Deviation) Equivalency File	RC 026273 (PDF)
71	Singleton Plan 2 Map (Letter Size)	RC 030932
72	Singleton Plan 2 Population Summary	RC 030982
73	Singleton Plan 2 District Statistics	RC 030925
74	Singleton Plan 2 Communities of Interest Splits	RC 030745
75	Singleton Plan 3 (Zero Deviation) Equivalency File	RC 034944 (PDF)
76	Singleton Plan 3 Population Summary (AP)	RC 039227
77	Singleton Plan 3 District Statistics	RC 039137
78	Singleton Plan 3 Communities of Interest Splits	RC 038970
79	Coleman Plan 1 Communities of Interest Splits	RC 009238
80	Hatcher Plan 1 Communities of Interest Splits	RC 018041
81	2002 Preclearance Submission (Without Exhibits)	RC 043723–34
82	2011 Preclearance Submission (Without Exhibits)	ECF Nos. 113-87 and 113-88, No. 18-cv-907 (N.D. Ala.)
83	Secretary of State Merrill's Pre-Trial Brief, <i>Chestnut v. Merrill</i>	ECF No. 101, No. 18-cv-907 (N.D. Ala.)

84	Defendant's Exhibit 001, <i>Chestnut v. Merrill</i> (Congressional Maps)	ECF No. 114-1, No. 18-cv-907 (N.D. Ala.)
85	Trey Hood Report, <i>Chestnut v. Merrill</i>	ECF No. 114-7, No. 18-cv-907 (N.D. Ala.)
86	May 2021 Whole County Plan Draft	
87	Thomas M. Bryan – Singleton Report	
88	Thomas M. Bryan – Milligan Report	
89	Thomas M. Bryan CV	
90	Thomas M. Bryan Supplemental Report – Final	
91	M.V. Hood III Expert Report	
92	M.V. Hood III Supplemental Report – Final	
93	Clay Helms Declaration	
94	Mary McIntyre Declaration (12.20.21)	
95	Declaration of Josiah Bonner, Jr.	
96	Evans Letter to DOJ 4.15.1992 SOS007081	
97	Evans letter to DOJ 3.10.1992 SOS007085	
98	Evans Letter to Justice Dept. 3.10.1992, Section 5 Submission by State of Alabama SOS007070	
99	Evans Letter to Justice Dept. 3.10.1992, Section 5 Submission by State of Alabama SOS007070 Part 2	
100	DOJ Letter to Jimmy Evans 3.27.1992 SOS007071	
101	Kathleen L. Wilde fax to John Tanner of the DOJ 3.25.1992 SOS007079	
102	Letter to DOJ re Preclearance Submission of Al. Act. No. 2011-518 SOS002646	
103	2001 Alabama State Board of Education Districts	
104	2010 Allen Congressional Plan 4 SOS001466	
105	2011 Preclearance Allen Plan 6 SOS001551	
106	2011 Preclearance Beason Plan SOS001565	
107	2011 Preclearance bpshan SOS001448	
108	2011 Preclearance Buskey Congressional Plan SOS001621	

109	2011 Preclearance Hammon All District Status SOS001579	
110	2011 Preclearance Map McClendon Congressional Plan 1 - Map-0SOS001431	
111	2011 Preclearance McClendon Congressional Plan 1 SOS001593	
112	2011 Preclearance Poole Congressional Plan 4 SOS001607	
113	2011 Preclearance Population Summary Report State 1 SOS001537	
114	2011 Plan - 2 - Population and VAP Summary - Single Race	
115	2011 Plan - 3 - Population and VAP Summary - Any Part Race	
116	2011 Plan - 4 - Plan Components' Population and VAP - Any Part Race	
117	2011 Plan - 5 - Plan Components' Population and VAP - Single Race	
118	2011 Plan - 6 - County and Voting Districts Splits	
119	2011 Preclearance Population Summary Report Allen SOS001635	
120	2011 Preclearance Population Summary Report McClammy SOS001509	
121	2011 Preclearance Population Summary Report SOS001649	
122	2020 Democratic Runoff	
123	2020-03 Certification AL Democratic Party Primary Runoff Candidates 2020-03-11	
124	2021-10-25 2021 2nd Special Session Proclamation	
125	2021 Alabama Congressional Plan Bill History with Recorded Votes	
126	2021 Redistricting Plans Comparative by District Analysis Congressional	
127	2021 Plan - 1 - Map	
128	2021 Plan - 2 - District Statistics	
129	2021 Plan - 3 - Population Summary - Single Race	

130	2021 Plan - 4 - VAP Summary - Single Race	
131	2021 Plan - 5 - Population Summary - Any Part Race	
132	2021 Plan - 6 - VAP Summary - Any Part Race	
133	2021 Plan - 7 - Plan Components' Population and VAP	
134	2021 Plan - 8 - County and Voting District Splits	
135	2021 Plan - 9 - City Splits	
136	2021 Plan - 10 - Reock Compactness Measure	
137	2021 Plan - 11 - Schwartzberg Compactness Measure	
138	2021.09.07 Public Hearing Transcript - Permanent Legislative Committee On Reapportionment (Shelton State - Tuscaloosa AL)	
139	AL DEM Cert. Amend 12182019	
140	Certification of Results June 4, 1996, Constitutional Amendments	
141	Democratic Party-Official 2020 Primary Election Results (1)	
142	District Statistics Report Congressional Final, May 16	
143	Exhibits to Congressional Submission SOS002005	
144	Final Exhibits - District Statistics Report Congressional Final, May 16	
145	Hatcher Plan - 1 - Map	
146	Hatcher Plan - 2 - District Statistics	
147	Hatcher Plan - 3- Population Summary - Single Race	
148	Hatcher Plan - 4 - VAP Summary - Single Race	
149	Hatcher Plan - 5- VAP Summary - Any Part Race	

150	Hatcher Plan - 6 - Population Summary - Any Part Race	
151	Hatcher Plan - 7 - Plan Components' Population and VAP	
152	Hatcher Plan - 8 - County and Voting District Splits	
153	Hatcher Plan - 9 - City Splits	
154	Hatcher Plan - 10 - Reock Compactness Measure	
155	Hatcher Plan - 11 - Schwartzberg Compactness Measure	
156	<i>Jones v. Jefferson County</i> – Motion for Consent Order (agreed before litigation)	
157	Kiani Gardner – CD-1 candidate endorsed by ADC	
158	Alabama Advisory Committee to U.S. Commission on Civil Rights Report (July 2020)	
159	Letter to John Park Jr. 11.21.2011 SOS000514	
160	Letter to John Tanner dated 4.15.1992	
161	Liu – Alabama Democrats Candidate list 2020 Primaries	
162	Pierce Map 9.91991 SOS007159	
163	Pleasant Grove Settlement Agreement	
164	Reapportionment Committee Guidelines for Legislative, State Board of Education, and Congressional Redistricting State of Alabama May 2011	
165	Legislative Reapportionment Public Hearings Aug 5	
166	Singleton 1 Plan - 1 - Map	
167	Singleton 1 Plan - 3 - District Statistics	
168	Singleton 1 Plan - 4 - Population Summary - Single Race	
169	Singleton 1 Plan - 5 - VAP Summary - Single Race	
170	Singleton 1 Plan - 6 - Population Summary - Any Part Race	

171	Singleton 1 Plan - 7 - VAP Summary - Any Part Race	
172	Singleton 1 Plan - 8 - Plan Components' Population and VAP	
173	Singleton 1 Plan - 9 - County and Voting District Splits	
174	Singleton 1 Plan - 10 - City Splits	
175	Singleton 1 Plan - 11 - Reock Compactness Measure	
176	Singleton 1 Plan - 12 - Schwartzberg Compactness Measure	
177	Singleton 2 Plan - 3 - District Statistics	
178	Singleton 2 Plan - 4 - Population Summary - Any Part Race	
179	Singleton 2 Plan - 5 - VAP Summary - Any Part Race	
180	Singleton 2 Plan - 6 - Plan Components' Population and VAP	
181	Singleton 2 Plan - 7 - County and Voting District Splits	
182	Singleton 2 Plan - 8 - City Splits	
183	Singleton 2 Plan - 9 - Reock Compactness Measure	
184	Singleton 2 Plan - 10 - Schwartzberg Compactness Measure	
185	Singleton 3 Plan - 1 - Map	
186	Singleton 3 Plan - 3 - District Statistics	
187	Singleton 3 Plan - 4 - VAP Summary - Single Race	
188	Singleton 3 Plan - 5 - Population Summary - Single Race	
189	Singleton 3 Plan - 6 - Population and VAP Summary - Any Part Race	
190	Singleton 3 Plan - 7 - Plan Components' Population and VAP	
191	Singleton 3 Plan - 8 - County and Voting District Splits	
192	Singleton 3 Plan - 9 - City Splits	

193	Singleton 3 Plan - 10 - Reock Compactness Measure	
194	Singleton 3 Plan - 11 - Schwartzberg Compactness Measure	
195	DOJ Letter withdrawing objection	
196	Letter to DOJ Feb. 7, 2002, re: Submission under Section 5 of the VRA of 65, Ala. Act No. 2002-73	
197	Letter to Civil Rights Division re Preclearance Submission of Ala. Act. No. 2011-677 – 1212857 Sept. 21, 2011	
198	US Congress Final District Statistics Report SOS001080	
199	2021 Census – Alabama Profile	
200	Democratic Party-Official 2020 Primary Election Results (only CD1 and CD2 results others hidden)	
201	Census 2018 Voting and Reg by Race	
202	Census 2016 Voting and Reg by Race	
203	Letter to Justice Dept. 3.10.1992 Section 5 Submission by State of Alabama Part 1	
204	Letter to Justice Dept. 3.10.1992 Section 5 Submission by State of Alabama Part 2	
205	Legislative Reapportionment Public Hearings Aug 5	
206	ACS 2019 Data Connecticut	
207	ACS 2019 Data United States	
208	Byrne Declaration	

IV. List of Contested Exhibits

The following lists the exhibits sought to be introduced by one or more parties to which another party has objected, with one chart per party. Each chart provides a description of the exhibit and the ground(s) for the objection. Per the Court’s order, a copy of all objected-to exhibits will be filed with the Court as attachments. This

list does not include any exhibits the propounding party intends to use solely as a demonstrative or for impeachment purposes and for which they do not intend to seek admission into evidence.

<i>Milligan</i> Plaintiffs' Objected-To Exhibits	
Exhibit	Objections
Transcript of Alabama Senate Floor Debate, Nov. 3, 2021	Authenticity

<i>Singleton</i> Plaintiffs' Objected-To Exhibits	
Exhibit	Objections
32 - DRA About election data.pdf	Authenticity; Relevance
33 - DRA D7 Act 2021-555 map.pdf	Authenticity; Relevance
34 - DRA Act 2021-555 plan stats.pdf	Authenticity; Relevance
42 - DRA Whole County Plan map.pdf	Authenticity; Relevance
43 - DRA Whole County Plan statistics.pdf	Authenticity; Relevance
51 - DRA Singleton Congressional Plan 2 map.pdf	Authenticity; Relevance
52 - DRA Singleton Congressional Plan 2 statistics.pdf	Authenticity; Relevance
60 - DRA Singleton Congressional Plan 3 map.pdf	Authenticity; Relevance
61- DRA Singleton Congressional Plan 3 statistics.pdf	Authenticity; Relevance

Defendants' Objected-To Exhibits¹	
Exhibit	Objections
Bonner Declaration Bonner Deposition Testimony with exhibits - Part 1	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay
Bonner Declaration Bonner Deposition Testimony with exhibits - Part 2	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay

¹ Objections come from the *Milligan* Plaintiffs. The *Singleton* Plaintiffs do not object to the authenticity or relevance of any of the Defendants' exhibits. The *Singleton* Plaintiffs reserve the right to object if an exhibit is offered for a purpose not permitted by the Federal Rules of Evidence.

Bonner Declaration Bonner Deposition Testimony with exhibits - Part 3	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay
Byrne Testimony and Exhibits Part 1	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay
Byrne Testimony and Exhibits Part 2	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay
1991-06-14 Public Hearing Transcript - Joint Legislative Committee on Reapportionment (Mobile , AL) SOS008654	Relevance; Hearsay
1991.08.21 Public Hearing Transcript - Joint Legislative Committee on Reapportionment (Montgomery AL) SOS 007291	Relevance; Hearsay
1991.10.02 Public Hearing Transcript - Joint Legislative Committee on Reapportionment (Montgomery AL) SOS007200	Relevance; Hearsay
1992.03.29 DOJ Objection letter	Duplicate exhibit
2011 Plan - <i>Alabama v. Holder</i> (DDC) Complaint	Relevance
2011 Plan – <i>Alabama v. Holder</i> (DDC) Dismissal	Relevance
2011 Plan - <i>Alabama v. Holder</i> (DDC) DOJ Preclearance	Relevance
<i>State of Alabama v. Holder</i> Errata to Complaint SOS000172	Relevance
2020 Annual Report - State Personnel Board	Relevance
Application of Appellant Billy Joe Camp, Secretary of State of Alabama, for Stay of Judgment Pending Appeal	Hearsay
SCOTUS No. 91-1553 - Appellee Paul Charles Wesch's Motion to Dismiss or Affirm	Relevance
SCOTUS No. 91-1553 - Jurisdictional Statement	Relevance
SCOTUS No. 91-1553 - Appendix to the Jurisdictional Statement Part 1	Relevance; Hearsay

SCOTUS No. 91-1553 - Appendix to the Jurisdictional Statement Part 2	Relevance; Hearsay
SCOTUS No. 91-1553 - Appendix to the Jurisdictional Statement Part 3	Relevance; Hearsay
SCOTUS No. 91-1553 - Appendix to the Jurisdictional Statement Part 4	Relevance; Hearsay
Preclearance submission Exhibit C-10 alternative plan McClammy	Rule 106 (completeness)
Preclearance submission Exhibit C-11 alternative plan McClammy 2M	Rule 106 (completeness)
Preclearance submission Exhibit C-12 alternative plan McClammy PPB	Rule 106 (completeness)
Preclearance submission Exhibit C-13 alternative plan Poole-Hubbard	Rule 106 (completeness)
Preclearance submission Exhibit C-14 alternative plan alternative plan State 1	Rule 106 (completeness)
Preclearance submission Exhibit C-8 alternative plan Allen	Rule 106 (completeness)
Preclearance submission Exhibit C-9 alternative plan Greer 2	Rule 106 (completeness)
SOS002410 Reapportionment Committee Guidelines May 2011	Relevance
<i>Thompson v. Merrill</i> Alabama Board of Pardons and Paroles Chair Leigh Gwathney's Objections and Answers to Plaintiffs' First Set of Interrogatories to Her	Relevance, Hearsay
<i>Thompson v. Merrill</i> SOS Merrill's Objections and Answers to Plaintiff's First Set of Interrogatories to Him	Relevance, Hearsay
US election 2020 Why Trump gained support among minorities	Relevance, Hearsay
<i>Wesch</i> -Supplemental Stipulation	Relevance
<i>Milligan v. Merrill</i> Deposition Transcript of Randy Hinaman 2021.12.09 Part 1	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay
<i>Milligan v. Merrill</i> Deposition Transcript of Randy Hinaman 2021.12.09 Part 2	Improper use of deposition testimony under FRCP 32(a)(4); Hearsay

2000 Population State Board of Education	Relevance, Hearsay
CDC MMWR – Study Showing vaccination by SVI index	Hearsay
Hispanic Voters Now Evenly Split Between Parties, WSJ Poll Finds	Relevance, Hearsay
Redistricting Alabama: How South Alabama could be split due to Baldwin County’s growth	Relevance, Hearsay
Voting Determination Letters for Alabama	Relevance
Felon Voting Rights Final Version	
2017.08.09 Alabama Senate Profile – Robert Kennedy Jr. says he’s more than a name	Relevance, Hearsay
Economic Policy Institute, State unemployment by race and ethnicity (2021Q3)	Hearsay
Becoming Less Separate	Rule 106 (completeness)
Defendant's First Evidentiary Submission	Relevance
Randy Hinaman Amended Notice of Deposition 120921	Relevance

V. Additional Stipulations of Fact

The Parties do not have any additional factual stipulations to provide.

Respectfully submitted,

DATED this 23rd day of December 2021.

/s/ Deuel Ross

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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 23th day of December 2021.

/s/ Deuel Ross

COUNSEL FOR PLAINTIFFS