

**CHRISTOPHER P. PRINGLE
EVAN MILLIGAN, et al. vs WES ALLEN, et al.****August 09, 2023****1-4**

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 NO. 2:21-CV-01530-AMM</p> <p>6</p> <p>7 EVAN MILLIGAN, et al.,</p> <p>8 Plaintiffs,</p> <p>9 vs.</p> <p>10 WES ALLEN, et al.,</p> <p>11 Defendants.</p> <p>12</p> <p>13</p> <p>14 VIDEOTAPED REMOTE DEPOSITION OF:</p> <p>15 CHRISTOPHER P. PRINGLE</p> <p>16 August 9, 2023</p> <p>17 3:04 P.M.</p> <p>18</p> <p>19</p> <p>20</p> <p>21 REPORTED BY:</p> <p>22 Cindy C. Jenkins, CCR</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 S T I P U L A T I O N S</p> <p>2 (continued)</p> <p>3</p> <p>4 IT IS FURTHER STIPULATED AND AGREED</p> <p>5 that it shall not be necessary for any</p> <p>6 objections except as to form or leading</p> <p>7 questions, and that counsel for the parties</p> <p>8 may make objections and assign grounds at the</p> <p>9 time of the trial, or at the time said</p> <p>10 deposition is offered in evidence or prior</p> <p>11 thereto.</p> <p>12</p> <p>13 IT IS FURTHER STIPULATED AND AGREED</p> <p>14 that the notice of filing of the deposition by</p> <p>15 the Commissioner is waived.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 2</p> <p>1 S T I P U L A T I O N S</p> <p>2</p> <p>3 IT IS STIPULATED AND AGREED by and</p> <p>4 between the parties through their respective</p> <p>5 counsel, that the deposition of Christopher P.</p> <p>6 Pringle may be taken before Cindy C. Jenkins,</p> <p>7 Commissioner, via Zoom Video Conference, on</p> <p>8 the 9th day of August, 2023.</p> <p>9</p> <p>10 IT IS FURTHER STIPULATED AND AGREED</p> <p>11 that the signature to and the reading of the</p> <p>12 deposition by the witness is waived, the</p> <p>13 deposition to have the same force and effect</p> <p>14 as if full compliance had been had with all</p> <p>15 laws and rules of Court relating to the taking</p> <p>16 of depositions.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE MILLIGAN</p> <p>4 PLAINTIFFS:</p> <p>5 NAACP LEGAL DEFENSE & EDUCATIONAL FUND</p> <p>6 Mr. Deuel Ross</p> <p>7 Mr. Tanner Lockhead</p> <p>8 700 14th Street, Northwest</p> <p>9 Suite 600</p> <p>10 Washington, DC 20005</p> <p>11 dross@naacpldf.org</p> <p>12</p> <p>13 NAACP LEGAL DEFENSE</p> <p>14 & EDUCATIONAL FUND, INC.</p> <p>15 Ms. Brittany Carter</p> <p>16 40 Rector Street, 5th Floor</p> <p>17 New York, New York 10006</p> <p>18 212-965-2200</p> <p>19 AMERICAN CIVIL LIBERTIES UNION FOUNDATION</p> <p>20 Mr. Davin M. Rosborough</p> <p>21 125 Broad Street</p> <p>22 New York, New York 10004</p> <p>23 drosborough@aclu.org</p> <p>24 APPEARING ON BEHALF OF THE CASTER PLAINTIFFS:</p> <p>25 ELIAS LAW GROUP, LLP</p> <p>Ms. Makeba Rutahindurwa</p> <p>Mr. Joseph Posimato</p> <p>250 Massachusetts Avenue, Northwest</p> <p>Suite 400</p> <p>Washington, D.C. 20001</p> <p>jjasarasaria@elias.law</p> <p>APPEARING ON BEHALF OF THE COCHAIRS; RANDY</p> <p>HINAMAN, STEVE LIVINGSTON, and CHRIS PRINGLE:</p> <p>BALCH & BINGHAM</p> <p>Mr. Dorman Walker</p> <p>105 Tallapoosa Street</p> <p>Suite 200</p> <p>Montgomery, Alabama 36104</p> <p>dwalker@balch.com</p>

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<p>1 APPEARANCES (continued)</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE SECRETARY OF STATE, WES ALLEN:</p> <p>4 OFFICE OF THE ATTORNEY GENERAL Mr. Jim Davis Assistant Attorney General 501 Washington Avenue 6 Montgomery, Alabama 36130 jim.davis@alabamaag.gov</p> <p>7</p> <p>8 VIDEOGRAPHER: 9 Mr. Bailey Diaz</p> <p>10</p> <p>11 ALSO PRESENT: 12 Ms. Joelle Miller 13 Ms. Donna Loftin</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 PROCEEDINGS</p> <p>2 AUGUST 9, 2023 3:04 P.M.</p> <p>3 THE VIDEOGRAPHER: Good afternoon.</p> <p>4 We are now on the record. The time is</p> <p>5 3:04 p.m. on Wednesday, August 9th, 2023.</p> <p>6 This begins the videotaped deposition of Chris</p> <p>7 Pringle taken in the matter of Evan Milligan,</p> <p>8 et. al., vs. Wes Allen, et al., the case</p> <p>9 number of which is 2:21-CV-01530-AMM. The</p> <p>10 videographer today is Bailey Diaz. Our court</p> <p>11 reporter is Cindy Jenkins, both representing</p> <p>12 Esquire Deposition Solutions.</p> <p>13 Counsel, will you please announce</p> <p>14 your name for the record and whom you</p> <p>15 represent, after which the court reporter will</p> <p>16 swear in the witness.</p> <p>17 MR. LOCKHEAD: This is Tanner</p> <p>18 Lockheed on behalf of Milligan plaintiffs from</p> <p>19 the Legal Defense Fund.</p> <p>20 MR. DAVIS: Jim Davis for the</p> <p>21 defendant, Secretary of State, Wes Allen.</p> <p>22 MR. WALKER: Dorman Walker</p> <p>23 representing defendant, Chris Pringle.</p> <p>24 MR. ROSBOROUGH: Davin Rosborough</p> <p>25 also for the Milligan plaintiffs.</p>
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<p>1 INDEX</p> <p>2 WITNESS PAGE</p> <p>3 CHRISTOPHER P. PRINGLE</p> <p>4 Examination by Mr. Lockheed 8</p> <p>5</p> <p>6</p> <p>7 INDEX OF EXHIBITS</p> <p>8 NUMBER PAGE</p> <p>9 Exhibit A 17</p> <p>10 Exhibit C 48</p> <p>11 Exhibit D 52</p> <p>12 Exhibit F 57</p> <p>13 Exhibit G 77</p> <p>14 Exhibit H 85</p> <p>15 Exhibit I 88</p> <p>16 Exhibit J 89</p> <p>17 Exhibit K 96</p> <p>18 Exhibit L 106</p> <p>19 Exhibit O 108</p> <p>20 Exhibit X 61</p> <p>21 Exhibit Y 62</p> <p>22 Exhibit Z 102</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 MS. CARTER: Brittany Carter for</p> <p>2 the Milligan plaintiffs.</p> <p>3 MR. POSIMATO: This is Joseph</p> <p>4 Posimato on behalf of the Caster plaintiffs.</p> <p>5 MS. RUTAHINDURWA: Makeba</p> <p>6 Rutahindurwa on behalf of the Caster</p> <p>7 plaintiffs.</p> <p>8 MR. ROSBOROUGH: We also have</p> <p>9 Deuel Ross here on behalf of the Milligan</p> <p>10 plaintiffs and Joelle Miller who is a legal</p> <p>11 intern with the Legal Defense Fund.</p> <p>12 CHRIS PRINGLE,</p> <p>13 being first duly sworn, was examined and</p> <p>14 testified as follows:</p> <p>15 EXAMINATION BY MR. LOCKHEAD:</p> <p>16 Q. Good afternoon. My name is Tanner</p> <p>17 Lockheed, and I represent the Milligan</p> <p>18 plaintiffs in this case. And I'll be taking</p> <p>19 your deposition this afternoon.</p> <p>20 Would you mind starting by stating</p> <p>21 your full name for the record?</p> <p>22 A. Christopher Paul Pringle.</p> <p>23 Q. And Mr. Pringle, you understand</p> <p>24 that you're testifying under oath?</p> <p>25 A. I do.</p>



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<p style="text-align: right;">Page 9</p> <p>1 Q. Okay. Is there anything that 2 might prevent you from understanding my 3 questions or answering truthfully today? 4 A. Only the audio on this feed. 5 Prevent me from hearing you. It doesn't 6 prevent me from telling the truth. 7 Q. That's fair. If I cut out at any 8 point, just let me know. And Mr. Pringle, are 9 you currently represented by an attorney? 10 A. Dorman Walker. 11 Q. So Mr. Pringle, you were last 12 deposed in this case on December 17th, 2021; 13 is that correct? 14 A. I believe so, yes. 15 Q. Have you testified in any trial or 16 deposition since your prior deposition in this 17 case? 18 A. No. 19 Q. Okay. I'll just go over some of 20 the key rules of road just as a refresher if 21 that's all right. So I'll ask questions. If 22 you don't understand a question, just let me 23 know. If you answer a question, I'll assume 24 that you understood the question; is that 25 fair?</p>	<p style="text-align: right;">Page 11</p> <p>1 A. No. 2 Q. Okay. Did you review any 3 documents? 4 A. No. I turned all of mine over. 5 Q. Did you review any documents in 6 the course of turning them over for the 7 deposition? 8 A. Not really. 9 Q. Okay. Have you discussed the 10 deposition with anyone? 11 A. No. 12 Q. Okay. 13 A. Just I told my girlfriend -- I 14 told my girlfriend I have one. 15 Q. So fair to say nobody from the 16 State of Alabama affiliated with state 17 legislature? 18 A. No. 19 Q. Okay. Who first told you that 20 your deposition had been requested in this 21 case? 22 A. Dorman. 23 Q. Okay. And are you being 24 compensated by anyone for being here today in 25 this deposition?</p>
<p style="text-align: right;">Page 10</p> <p>1 A. Yes. 2 Q. Also, of course, the court 3 reporter is here, as you may have already 4 noticed, and there's a video recording. So 5 it's important that just one person speak at a 6 time. So just please -- I ask that you allow 7 me to finish my questions, and I'll do my best 8 to make sure you're able to finish your 9 answers before jumping into the next question; 10 is that all right? 11 A. Yes. 12 Q. Great. So without disclosing the 13 content of any discussions with your attorney, 14 what did you do to prepare for your deposition 15 today? 16 A. Nothing. 17 Q. Did you meet with any of your 18 attorneys? 19 A. I talked to Dorman on the phone. 20 Q. Okay. Only once or multiple 21 times? 22 A. Two or three times. 23 Q. Okay. Did you meet with anyone 24 who was not an attorney in preparation for the 25 deposition today?</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I'm losing so much money right 2 now it's not even funny. No. 3 Q. And do you expect to be 4 compensated in any way to testify at trial in 5 this matter? 6 A. No. 7 Q. So Representative Pringle, since 8 your prior deposition in this case in 2021, 9 have you been involved in any other lawsuits, 10 any other depositions? 11 A. No. 12 Q. Okay. So let's go ahead and 13 transition to your time in the legislature. 14 What is your current role in Alabama 15 legislature? 16 A. State representative house 17 district 101 and speaker pro tempore of the 18 Alabama house. 19 Q. Are you currently on any 20 committees? 21 A. Numerous. 22 Q. Which ones? 23 A. I am cochairman of the 24 legislative council. I'm cochairman of 25 reapportionment. I'm on the elections</p>

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<p style="text-align: right;">Page 13</p> <p>1 committee. I'm on the Mobile County 2 legislative delegation committee. I'm on the 3 contract review committee. I can't even name 4 them all. 5 Q. So for purposes of brevity, 6 throughout this deposition when I refer to the 7 redistricting committee, what I mean by that 8 is the reapportionment committee. Can we 9 agree to that? Is that fair? 10 A. That's perfectly fine. 11 Q. Okay. You said you served as 12 cochairman of the reapportionment committee 13 during the 2021 redistricting cycle; is that 14 correct? 15 A. Correct. 16 Q. And you also served as cochair 17 during the 2023 redistricting cycle as well; 18 is that correct? 19 A. Correct. 20 Q. Okay. Representative Pringle, how 21 did you come to be the cochair in 2021? 22 A. I was elected by my peers. 23 Q. And what about in 2023? 24 A. Elected by my peers. 25 Q. Would you mind just quickly</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. Okay. That decision was issued on 2 June 8th, 2023, does that sound right? 3 A. Yes, sir. 4 Q. Okay. How did you become aware of 5 that decision? 6 A. The news. 7 Q. Did you speak to anybody about it? 8 A. Well, I'm sure I called Dorman 9 very quickly to find out. 10 Q. Did you speak to anybody else? 11 A. You know, probably a thousand 12 people have talked to me about that decision. 13 Q. Okay. Well, let's maybe take 14 it -- 15 A. I can't remember. 16 Q. Did you speak -- Representative 17 Pringle, am I coming through okay? 18 A. You're breaking up, but go 19 ahead. 20 Q. Okay. Did you speak with Governor 21 Ivey about the decision? 22 A. No. 23 Q. What about other members of the 24 Alabama congressional delegation? 25 A. Yes.</p>
<p style="text-align: right;">Page 14</p> <p>1 walking me through your responsibilities as 2 cochair of that committee? 3 A. I'm the house cochair. So when 4 the house side of it meets, I chair that 5 committee. When the full committee meets, 6 sometimes I chair it, sometimes Livingston 7 will chair it. 8 Q. Okay. And what does that involve, 9 chairing? 10 A. We go through the agenda. You 11 run the meeting. 12 Q. Did your responsibilities as chair 13 change from the 2021 cycle through to the 2023 14 cycle, or would you say they're about the 15 same? 16 A. About the same. 17 Q. Okay. Okay. So let's go ahead 18 and jump into the thing. So are you aware of 19 the Supreme Court's decision in Allen vs. 20 Milligan? 21 A. Yes, sir. 22 Q. Okay. Did you read that decision? 23 A. Not in its entirety, no. 24 Q. Did you read it in part? 25 A. Parts of it, yes, sir.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. And who was that? 2 A. Jerry Carl, Mike Rogers. 3 Q. Any others? 4 A. No. 5 Q. Did you speak with Senator 6 Tuberville? 7 A. No. 8 Q. Or a member of his staff? 9 A. No. 10 Q. What about any folks at the NRG 11 (sic), the national republican redistricting 12 trust? 13 A. Not since 2021. 14 MR. LOCKHEAD: Okay. 15 Let's go ahead if it's all right 16 and pull up what's been marked as Exhibit A. 17 I think that Davin is going to help out with 18 that. 19 THE WITNESS: Somebody's going to 20 have to help me because I don't see anything. 21 Oh, wait a minute. There we go. 22 Thank you. 23 Q. (By Mr. Lockhead) Representative 24 Pringle, can you see that all right? 25 A. Yes.</p>

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<p style="text-align: right;">Page 17</p> <p>1 (Whereupon, Exhibit A was marked 2 for identification.) 3 Q. (By Mr. ^ Attyname) Representative 4 Pringle, what -- do you recognize this 5 document? 6 A. Yes. 7 Q. And what is it? 8 A. It's a lawsuit. 9 Q. Do you know which lawsuit? 10 A. The Milligan vs. Merrill. 11 Q. And this is the preliminary 12 injunction memorandum issued from the three 13 judge court in the Milligan case; is that your 14 understanding? 15 A. That's my understanding, yes. 16 Q. Okay. Representative Pringle, are 17 you familiar with the guidance given by the 18 Court in this case concerning what's required 19 in order to remedy a likely Voting Rights Act 20 violation under section 2? 21 A. Either two majority minority 22 districts or something close to it. They 23 were providing (inaudible) for a protected 24 class of citizens to elect a candidate of 25 their choosing.</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. And you were familiar with this 2 passage; correct? 3 A. Yes. 4 Q. In fact, I think you recited it 5 from memory; is that fair? 6 A. I'm familiar with it. 7 Q. What role, if any, did this 8 passage from the preliminary injunction order 9 play in your consideration of these new maps 10 during the 2023 redistricting cycle? 11 A. That we were charged with 12 drawing a map that would provide an 13 opportunity for the black voters to elect a 14 candidate of their choosing. 15 Q. Did you have an understanding of 16 what was required in order for that 17 opportunity to comply with the opportunity as 18 its expressed in this paragraph? 19 A. An opportunity for blacks to 20 elect a candidate of their choosing. 21 Q. Okay. So as you were considering 22 plans, did you have an understanding of what 23 it means for black voters to have an 24 opportunity to elect a representative of their 25 choice?</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. So you're familiar with that 2 guidance given by the Court concerning what 3 was required of the map? 4 A. Yes, sir. 5 MR. LOCKHEAD: Okay. Can we 6 scroll to page 6, and if we could zoom in a 7 little bit. 8 Q. Representative Pringle, I'm going 9 to start to read at the paragraph that begins 10 with the legislature. Do you see that 11 paragraph? 12 A. Yes. 13 Q. Okay. "The legislature enjoys 14 board discretion and may consider a wide range 15 of remedial plans. As the legislature 16 considers such plans, it should be mindful of 17 the practical reality based on the ample 18 evidence of intensely racially polarized 19 voting adduced during the preliminary 20 injunction proceedings that any remedial plan 21 will need to include two districts in which 22 black voters either comprise a voting age 23 majority or something quite close to it." Did 24 I read that correctly? 25 A. Yes, sir.</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Ask me that again, please. 2 Q. Sure. Tell me what you 3 understand -- what it means to provide black 4 voters with an opportunity to elect a 5 candidate of their choice. 6 A. You know, a district which they 7 have the ability to elect or defeat somebody 8 of their choosing. I have no magic number on 9 that. 10 Q. Sure. Does it turn on the ability 11 to elect for you? 12 A. Yes. Ability. 13 Q. So in thinking through this 14 decision, other than with your counsel, of 15 course, did you have discussions with anyone 16 about what it means for black voters to have 17 an opportunity to elect a representat ve of 18 their choice in a district? 19 A. Not that I recall. 20 Q. Okay. Not other members of the 21 legislature? 22 A. Not that I recall. 23 Q. Okay. So you did not -- cannot 24 recall an example of any discussion with the 25 legislature regarding what it means to create</p>

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<p style="text-align: right;">Page 21</p> <p>1 an opportunity district?</p> <p>2 A. Not -- not that I can recall.</p> <p>3 Q. Okay. Let's go ahead and turn to</p> <p>4 the 2023 process itself.</p> <p>5 So Representative Pringle, at what</p> <p>6 point did you first begin working on a new map</p> <p>7 after the Supreme Court decision?</p> <p>8 A. Probably within a matter of days</p> <p>9 after the Supreme Court handed down the</p> <p>10 ruling in June.</p> <p>11 Q. And who did you consult in that</p> <p>12 process?</p> <p>13 A. My attorney Dorman Walker and</p> <p>14 Randy Hinaman and my cochairman Steve</p> <p>15 Livingston.</p> <p>16 Q. Did you speak with anyone else at</p> <p>17 that stage when you were beginning to draft</p> <p>18 maps, other legislators or members of the</p> <p>19 congressional delegation or others?</p> <p>20 A. Not that I recall.</p> <p>21 Q. Okay. Did you speak with</p> <p>22 Congresswoman Terry Sewell or any of her</p> <p>23 staff?</p> <p>24 A. No, sir.</p> <p>25 Q. What about Speaker McCarthy?</p>	<p style="text-align: right;">Page 23</p> <p>1 A. You know, it's -- like I said,</p> <p>2 my overriding principle is what the United</p> <p>3 States Supreme Court told us to do. They --</p> <p>4 they told us draw a map, and that's what I</p> <p>5 tried to do.</p> <p>6 Q. So you said you spoke with Speaker</p> <p>7 McCarthy. Did you speak with anyone else that</p> <p>8 you can recall during this stage when you were</p> <p>9 first working on the map after the decision?</p> <p>10 A. You know, I've had 10,000</p> <p>11 conversations. People stop me on the street</p> <p>12 asking me about it. So what specific</p> <p>13 questions do you want to talk about?</p> <p>14 Q. Well, how about let's -- what</p> <p>15 about with other folks, either, again, in the</p> <p>16 Alabama congressional delegation or other</p> <p>17 officials in Alabama. Any of those folks?</p> <p>18 A. You know, naturally I had a</p> <p>19 conversation with Brian Rell, Robert</p> <p>20 Aderholt's chief of staff. I've talked to</p> <p>21 Jerry Carl's chief of staff. I had a very</p> <p>22 brief conversation with Barry Moore's county</p> <p>23 director in the hallway at the very, very,</p> <p>24 very end of the special session. And then,</p> <p>25 of course, John Waugh called me from the</p>
<p style="text-align: right;">Page 22</p> <p>1 A. I had a very, very brief</p> <p>2 conversation with him one Sunday afternoon as</p> <p>3 I was returning from New Orleans, yes.</p> <p>4 Q. What did you discuss with Speaker</p> <p>5 McCarthy?</p> <p>6 A. The one time I met him in his</p> <p>7 office, I asked if he remembered meeting me</p> <p>8 several years ago. But mostly he just -- he</p> <p>9 just was concerned about keeping his majority</p> <p>10 and wanted us to keep that in mind. But it</p> <p>11 was not in any way -- it was very congenial</p> <p>12 call. He was -- he was not asking us to do</p> <p>13 anything other than just keep in mind that he</p> <p>14 has a very tight majority. It was a very</p> <p>15 pleasant phone call. He was not being</p> <p>16 insistent on trying to get us to do something</p> <p>17 we shouldn't at all.</p> <p>18 Q. How did that factor into your</p> <p>19 consideration of maps, if at all, during the</p> <p>20 process?</p> <p>21 A. Well, I mean, you know, my</p> <p>22 overriding principle is complying with what</p> <p>23 the United States Supreme Court told me to</p> <p>24 do.</p> <p>25 Q. So is fair to say not at all?</p>	<p style="text-align: right;">Page 24</p> <p>1 state party. That's really all I can</p> <p>2 remember right now.</p> <p>3 Q. What did your conversation with</p> <p>4 Mr. Waugh, what did you discuss?</p> <p>5 A. He said that he was going to</p> <p>6 retain some attorney -- I can't remember his</p> <p>7 name -- that he was available for me to talk</p> <p>8 to should I desire to talk to him.</p> <p>9 Q. Okay. What do you think prompted</p> <p>10 that?</p> <p>11 A. You'd have to ask him.</p> <p>12 Q. What about Barry Moore, you</p> <p>13 mentioned you spoke with the chief of staff;</p> <p>14 is that right?</p> <p>15 A. District director, Bill Harris.</p> <p>16 Q. District director.</p> <p>17 A. It was like a five second</p> <p>18 conversation in the hall. I just said, wish</p> <p>19 y'all the best of luck.</p> <p>20 Q. Did you speak with Mr. Ed LaCour?</p> <p>21 A. He was in the several meetings,</p> <p>22 yes.</p> <p>23 Q. Okay.</p> <p>24 A. I'm sorry. I forgot to mention</p> <p>25 him. He was definitely in the</p>

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<p style="text-align: right;">Page 25</p> <p>1 reapportionment office while we were there. 2 Q. Okay. Maybe if it's all right, I 3 realize it was a wild time, but if you want to 4 take just maybe a second and think if there 5 other folks again from congressional 6 delegations, officials in Alabama, that come 7 to mind. 8 A. Well, naturally, I mean, I had a 9 conversation with the speaker of the house 10 and the pro tempore of the senate. But they 11 were brief. Just updates on what we were 12 working on. 13 Q. Okay. Okay. Let's jump forward. 14 Did you retain any map drawers or 15 consultants at this stage when you were 16 beginning to draft maps in the 2023 cycle? 17 A. Randy Hinaman. 18 Q. Did you decide to retain 19 Mr. Hinaman, or was that someone else? 20 A. I mean, he was already -- he was 21 already part of the process and has been part 22 of the process since the early '90s as far as 23 I know. 24 Q. So did you retain him new, or was 25 this an existing agreement? Walk me through</p>	<p style="text-align: right;">Page 27</p> <p>1 many? 2 A. No. 3 Q. Was it a substantial number or 4 like one? 5 A. You know, you asked about a map. 6 There could have been -- as y'all argued in 7 court, there could be a trillion different 8 maps depending on how you do it. If you 9 point and click on any -- any census block, 10 that's a new map. You can get into the 11 trillions doing it. So, you know, one map 12 could have 50 different versions of it or 100 13 different versions or a thousand different 14 versions. So... 15 Q. Did he approach you with a 16 particular map on any given occasion? 17 A. No. 18 Q. So how did you know that he draw 19 maps? 20 A. He was in the room with his 21 computer across from me in reapportionment 22 working on maps. 23 Q. So let's maybe talk about that. 24 We'll come back to that maybe in a bit. But 25 let's talk about that meeting in particular.</p>
<p style="text-align: right;">Page 26</p> <p>1 what happened in 2023. 2 A. Mr. Hinaman, if I'm not -- is 3 part of the -- the -- he works with Dorman 4 Walker. And Dorman was already present when 5 I -- when I came on-board. 6 Q. Did Dorman recommend him to you 7 for the 2023 session? 8 A. We've -- we've always worked 9 together. 10 Q. So did he recommend him or not? 11 A. He was -- he's always been 12 there. 13 Q. Okay. Is there anyone else that 14 served as a map drawer? 15 A. For other me or for others? 16 Q. Or for the committee. 17 A. No. Well, Eddie LaCour worked 18 as a map drawer at some point in time. 19 Q. Okay. And what did he do as a map 20 drawer? 21 A. Drew maps. 22 Q. Do you remember how many or which 23 ones? 24 A. No. 25 Q. Would you have a guess for how</p>	<p style="text-align: right;">Page 28</p> <p>1 Did this happen in advance of the first 2 meeting of the reapportionment committee, or 3 when was that meeting? 4 A. Probably soon after the Supreme 5 Court handed down their ruling. 6 Q. Do you know who called that 7 meeting together? 8 A. I would -- if I remember 9 correctly, it would have been Senator 10 Livingston and myself. Again, the process of 11 trying to comply with the Supreme Court 12 ruling. 13 Q. And in that respect, did 14 Mr. LaCour primarily serve as a mapper drawer 15 or an attorney? 16 A. Initially as an attorney. 17 Q. What about after that? 18 A. I lost contact with Mr. LaCour 19 at the very beginning of the special session 20 and never saw or communicated with him again. 21 He was upstairs meeting with the senators in 22 a different room working with them to draw 23 what ultimately became the Livingston plans. 24 Q. Understood. What about Dr. Hood, 25 was he involved as a consultant at any stage?</p>

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<p style="text-align: right;">Page 29</p> <p>1 A. Dr. Hood, I believe, is the man 2 in Georgia that was giving us the performance 3 analysis on the plans. I never met him. 4 I've never seen him. I never talked to him. 5 Q. Did you see those performance 6 analyses? 7 A. I saw them on my plan, yes. I 8 did see the Livingston one, but it was at the 9 very end. 10 Q. Okay. So you mentioned that 11 Mr. Hinaman had worked with the committee 12 before; is that correct? 13 A. Yes. 14 Q. Okay. 15 A. And so had Mr. Walker. 16 Q. So Mr. Hinaman helped produce the 17 2021 congressional map; is that correct? 18 A. Correct. 19 Q. Okay. Can you talk me through the 20 decision to keep on Mr. Hinaman after that map 21 was ultimately found to be likely a violation 22 of the Voting Rights Act. 23 A. Mr. Hinaman has drawn numerous 24 plans over the years, many of which have been 25 challenged and successfully defended, some of</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Was it every other day or every 2 month? 3 A. You know, sometimes we'd meet 4 four times a day, and sometimes we might go a 5 couple of days without talking. 6 Q. Okay. Can you talk me through 7 what you instructed Mr. Hinaman to do during 8 the map drawing stage at that point? 9 A. Follow the guideline and comply 10 with what the Supreme Court told us. 11 Q. Did you take notes during any of 12 those meetings with Mr. Hinaman? 13 A. I'm not a note taker. 14 Q. Is that a no? 15 A. No. Yeah, that's a no. 16 Q. So you said you tasked him 17 following guideline and complying with the 18 Supreme Court order; is that correct? 19 A. Yes, sir. 20 Q. Is there anything else? 21 A. Not that I can think of right 22 now. 23 Q. When you instructed Mr. Hinaman to 24 draw the maps with the -- compliance with the 25 court decision and also the guidelines in</p>
<p style="text-align: right;">Page 30</p> <p>1 which have been challenged and had to be 2 redrawn. So I consider him to be an 3 extremely intelligent and competent person in 4 drawing maps and very knowledgeable. 5 Q. And that wasn't a factor? 6 A. What? 7 Q. His involvement in the 2021 8 redistricting process. 9 A. No. He's a very experienced and 10 knowledgeable person. 11 Q. So let's go back just to make sure 12 that I have the time line good to go. You 13 mentioned that you met with Mr. Hinaman before 14 the special session; is that right? 15 A. Yes. 16 Q. Okay. When was that? 17 A. Probably sometime shortly after 18 the Supreme Court ruling we began meeting and 19 talking. 20 Q. How often did you have those 21 meetings with Mr. Hinaman would you guess? 22 A. It depends on the day and the 23 week. 24 Q. Do you have an estimate? 25 A. No. Sorry.</p>	<p style="text-align: right;">Page 32</p> <p>1 mind, did you instruct him to draw a map with 2 two majority black districts or something 3 close to it in particular? 4 A. I just told him to follow the 5 guidelines and comply with what the Supreme 6 Court told us. And that was to draw two 7 districts which had the ability to elect a 8 black candidate. 9 Q. So you did instruct Mr. Hinaman to 10 draw a map with two districts where black 11 voters have an opportunity to elect a 12 candidate of their choice; is that fair? 13 A. I don't think I ever put it that 14 succinctly. I think I said we need to -- we 15 need to follow the guidelines in the Supreme 16 Court ruling. 17 Q. Did you explain in any other terms 18 what an opportunity to elect means? 19 A. No. 20 Q. What about an opportunity 21 district? 22 A. No. 23 Q. Okay. Did you provide Mr. Hinaman 24 with any materials? 25 A. A computer.</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q. Anything else?</p> <p>2 A. I mean, he just used the</p> <p>3 reapportionment computer, the state computer.</p> <p>4 Q. What about information, did you</p> <p>5 provide any data or other types of information</p> <p>6 for his process and work?</p> <p>7 A. I personally did not, no.</p> <p>8 Q. Do you know who might have</p> <p>9 provided information of that type?</p> <p>10 A. The computer in the</p> <p>11 reapportionment office.</p> <p>12 Q. Do you know if he received letters</p> <p>13 from either of the Voting Rights Act</p> <p>14 plaintiffs or other organizations that were</p> <p>15 submitted to the redistricting committee?</p> <p>16 A. Did I?</p> <p>17 Q. Actually, let's come back to that.</p> <p>18 Let's skip forward.</p> <p>19 What about information from public</p> <p>20 hearings, was any of that -- was there any</p> <p>21 information gathered from public hearings that</p> <p>22 you or others that you know of gave to</p> <p>23 Mr. Hinaman to draw his map?</p> <p>24 A. He was -- all of that</p> <p>25 information was made available to him.</p>	<p style="text-align: right;">Page 35</p> <p>1 it was July the 14th was the final day -- the</p> <p>2 final day that plans could be submitted.</p> <p>3 Q. But you saw drafts of that plan</p> <p>4 before that; is that right?</p> <p>5 A. I saw different versions of</p> <p>6 plans, yes. Trying to come up with that</p> <p>7 something that we thought would comply with</p> <p>8 the Court order.</p> <p>9 Q. And what feedback did you give to</p> <p>10 him to instruct him about how to better comply</p> <p>11 with the Court order by tweaking the map?</p> <p>12 A. I allowed -- I did not get</p> <p>13 involved in the minutia of tweaking the maps.</p> <p>14 Q. So did you provide him any</p> <p>15 feedback at all when he came to you with the</p> <p>16 draft?</p> <p>17 A. I just said do you think this</p> <p>18 would comply with the Court order based on</p> <p>19 you and the legal counsel's opinion?</p> <p>20 Q. Would you direct him to ask the</p> <p>21 attorney only or what -- I'm just trying to</p> <p>22 get a sense of what the conversations were</p> <p>23 like.</p> <p>24 A. It was -- I don't get involve</p> <p>25 minutia. I just tell you upfront. I mean,</p>
<p style="text-align: right;">Page 34</p> <p>1 Q. When did Mr. Hinaman provide you</p> <p>2 with a first draft of a congressional map</p> <p>3 related to the 2023 redistricting process?</p> <p>4 A. I couldn't tell you the date.</p> <p>5 There was so many different variations. The</p> <p>6 map was -- as I told somebody, I said, right</p> <p>7 now, that map looks like colored sand on a</p> <p>8 vibrating plate. It just changes by the</p> <p>9 second, so...</p> <p>10 Q. What about the community of</p> <p>11 interest plan? When I say the word community</p> <p>12 of interest plan, do you know what I'm</p> <p>13 referring to?</p> <p>14 A. That's the plan that I</p> <p>15 eventually introduced, yes.</p> <p>16 Q. When did Mr. Hinaman, if ever,</p> <p>17 present to you the community of interest plan</p> <p>18 the first time?</p> <p>19 A. A version, it was called -- I</p> <p>20 don't even remember what it was called before</p> <p>21 that. But you remember we didn't finalize --</p> <p>22 we couldn't finalize anything until after</p> <p>23 that July -- what was it, July -- Friday,</p> <p>24 July the 7th date? When was the final day to</p> <p>25 be turned in? No, it was Friday, July the --</p>	<p style="text-align: right;">Page 36</p> <p>1 my job is to pass a plan on the floor of the</p> <p>2 house. I hire professionals to draw it.</p> <p>3 Q. And you defer to them?</p> <p>4 A. Yes. I mean, that's the reason</p> <p>5 why you hire lawyers and professionals.</p> <p>6 Q. Do you think it's your job to have</p> <p>7 a view of what an opportunity district might</p> <p>8 be?</p> <p>9 A. Yeah, the one that gives the</p> <p>10 opportunity for minorities to elect or defeat</p> <p>11 a candidate of their choosing.</p> <p>12 Q. Is that something that sort of you</p> <p>13 consider your responsibility to communicate</p> <p>14 what that is to the map drawer or not as much?</p> <p>15 A. I mean, Randy is a very</p> <p>16 intelligent man and does an excellent job.</p> <p>17 And Dorman is a very, very experienced</p> <p>18 attorney. So that's a -- that's a no, I</p> <p>19 suppose. You know, I hire professional</p> <p>20 people, and I let them do their jobs.</p> <p>21 Q. Okay. Did you ever personally</p> <p>22 recommend any particular changes to any draft</p> <p>23 that Mr. Hinaman gave to you of the community</p> <p>24 of interest plan?</p> <p>25 A. No.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q. Did any of the drafts that</p> <p>2 Mr. Hinaman presented to you contain two</p> <p>3 majority black districts?</p> <p>4 A. I can't remember specifically</p> <p>5 what -- what the numbers were as they went</p> <p>6 through the process, no.</p> <p>7 Q. If he had, what would your</p> <p>8 response have been?</p> <p>9 A. Did we comply with what the</p> <p>10 Court wanted? Did we comply with our</p> <p>11 guidelines? And if it is, in fact, a racial</p> <p>12 gerrymander.</p> <p>13 Q. So there's a third factor, not</p> <p>14 just the first two?</p> <p>15 A. To figure out, you know, are we</p> <p>16 breaking communities up along racial lines?</p> <p>17 Are we breaking counties along racial lines?</p> <p>18 Q. So if the draft plan contained two</p> <p>19 majority minority districts, the inquiry would</p> <p>20 become does this constitute racial</p> <p>21 gerrymandering? But if does not contain two</p> <p>22 majority minority districts, then you would</p> <p>23 not ask the question about racial</p> <p>24 gerrymandering; is that fair?</p> <p>25 A. I would ask racial</p>	<p style="text-align: right;">Page 39</p> <p>1 A. Correct.</p> <p>2 Q. Do you know anyone who did</p> <p>3 instruct him to perform that analysis?</p> <p>4 A. I would just assume it would</p> <p>5 be Dorman, but I don't know.</p> <p>6 Q. Did you ask Dorman to contact</p> <p>7 Mr. Hood for that purpose?</p> <p>8 A. No.</p> <p>9 Q. Did you ever meet with Dr. Hood</p> <p>10 between the --</p> <p>11 A. No.</p> <p>12 Q. So you did not meet with</p> <p>13 Mr. Hood --</p> <p>14 A. I told you. I've never seen</p> <p>15 him -- I've never --</p> <p>16 COURT REPORTER: I'm so sorry. I</p> <p>17 didn't hear the whole question. Can you</p> <p>18 repeat that question, Mr. Lockhead, please?</p> <p>19 MR. LOCKHEAD: Sure. I know we're</p> <p>20 getting used to the court reporter. But I</p> <p>21 appreciate you.</p> <p>22 Q. (By Mr. Lockhead) So, just to</p> <p>23 clarify, Representative Pringle, did you ever</p> <p>24 meet with Dr. Trey Hood between June 8th when</p> <p>25 the Milligan decision was released and the end</p>
<p style="text-align: right;">Page 38</p> <p>1 gerrymandering any way.</p> <p>2 Q. What about if Mr. Hinaman had</p> <p>3 presented you with a map containing one</p> <p>4 majority black district and one district with</p> <p>5 a 45 percent black voting age population,</p> <p>6 would your response have been similar or</p> <p>7 different?</p> <p>8 A. I hate to speculate on that.</p> <p>9 Q. In your view, would that comply</p> <p>10 with what the Court required in this case?</p> <p>11 A. I hate to speculate.</p> <p>12 Q. Would you have voted for it?</p> <p>13 A. I would hate to speculate on</p> <p>14 what I would do.</p> <p>15 Q. Let's jump forward and talk about</p> <p>16 Mr. Hood briefly. You said Dr. Trey Hood was</p> <p>17 involved in the 2023 redistricting process; is</p> <p>18 that right?</p> <p>19 A. I heard his name as a person who</p> <p>20 was doing the analysis on the plans,</p> <p>21 performance analysis.</p> <p>22 Q. But you didn't --</p> <p>23 A. That's all.</p> <p>24 Q. -- instruct him to do any of that</p> <p>25 analysis; is that right?</p>	<p style="text-align: right;">Page 40</p> <p>1 of the special session?</p> <p>2 A. I've never seen him or spoken to</p> <p>3 him.</p> <p>4 Q. Okay. Did you ever review any</p> <p>5 analysis, I'll call it performance analysis,</p> <p>6 produced by Dr. Hood regarding your community</p> <p>7 of interest plan?</p> <p>8 A. Yes.</p> <p>9 Q. And when did you receive that</p> <p>10 analysis?</p> <p>11 A. I believe it was after the</p> <p>12 reapportionment committee meeting on Monday,</p> <p>13 was it July 17th? Yeah.</p> <p>14 Q. Did you know it was coming?</p> <p>15 A. I was waiting for it, yes.</p> <p>16 Q. How did you know it was coming?</p> <p>17 A. Because I knew, since we passed</p> <p>18 that plan out of committee, we were going to</p> <p>19 request it.</p> <p>20 Q. Who requested it?</p> <p>21 A. I would assume it was Dorman.</p> <p>22 Q. But there was an understanding</p> <p>23 that he would request it?</p> <p>24 A. I never spoke to the man. So I</p> <p>25 assume Dorman had requested it, and it came</p>

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<p style="text-align: right;">Page 41</p> <p>1 in.</p> <p>2 Q. Do you know why it was requested?</p> <p>3 A. So we could discuss whether the</p> <p>4 plan performed or not.</p> <p>5 Q. Okay. When you received his</p> <p>6 analysis, what was your reaction to it?</p> <p>7 A. I thought it proved that the</p> <p>8 community of interest plan would comply with</p> <p>9 what the Supreme Court ordered and would</p> <p>10 provide an opportunity for minority citizens</p> <p>11 to elect a candidate of their choosing.</p> <p>12 Q. One moment. Sorry.</p> <p>13 A. That's fine.</p> <p>14 Q. Okay. If we can -- actually, I'm</p> <p>15 going to skip by that.</p> <p>16 So the performance analysis that</p> <p>17 you received from -- from Dr. Hood, do you</p> <p>18 recall what it said?</p> <p>19 A. That democratic candidates would</p> <p>20 have the opportunity to win in elections.</p> <p>21 Not guaranteed, but they have an opportunity.</p> <p>22 Q. Was it significant that black</p> <p>23 preferred candidates won two out of four</p> <p>24 elections in the second congressional district</p> <p>25 under Dr. Hood's performance analysis?</p>	<p style="text-align: right;">Page 43</p> <p>1 voters won only one out of four elections that</p> <p>2 were analyzed, would that suggest that the</p> <p>3 opportunity district provided a fair</p> <p>4 opportunity for black voters to elect a</p> <p>5 candidate of their choice or not?</p> <p>6 A. Mine -- I provided them two.</p> <p>7 Not one, two. Two out of four.</p> <p>8 Q. What if it had resulted in zero</p> <p>9 out of four?</p> <p>10 A. You know, it didn't.</p> <p>11 Q. Let's go ahead and jump to the</p> <p>12 public hearing on June 29th.</p> <p>13 Representative Pringle, do you</p> <p>14 recall a public hearing regarding the remedial</p> <p>15 congressional districting proposals held on</p> <p>16 June 29th?</p> <p>17 A. Yes.</p> <p>18 Q. Who organized that hearing?</p> <p>19 A. That would be me and Senator</p> <p>20 Livingston.</p> <p>21 Q. And what was the purpose of that</p> <p>22 hearing?</p> <p>23 A. What that the first one? The</p> <p>24 29th.</p> <p>25 Q. That's the one on June 29th.</p>
<p style="text-align: right;">Page 42</p> <p>1 A. To me, it was, yes.</p> <p>2 Q. What if black preferred candidates</p> <p>3 had won one out of four?</p> <p>4 A. Mine had two out of four, so it</p> <p>5 gave it a 50/50 shot.</p> <p>6 Q. If it had been less, would that</p> <p>7 fail to be an opportunity district?</p> <p>8 A. It wasn't my plan.</p> <p>9 Q. What if it had been? I accept</p> <p>10 it's a hypothetical. But if it had been just</p> <p>11 one of four --</p> <p>12 A. Listen. I've drawn majority</p> <p>13 minority districts that turned around an</p> <p>14 elect white men to them. So I don't know how</p> <p>15 you can -- they were democrats, but they were</p> <p>16 majority minority districts that elected</p> <p>17 white men to them. And we've got an</p> <p>18 African -- we have a black republican member</p> <p>19 of the legislature elected in a majority</p> <p>20 white district just like we've had blacks</p> <p>21 elected out of majority white districts.</p> <p>22 So...</p> <p>23 Q. I suppose I may just have it</p> <p>24 unclear. If the performance analysis revealed</p> <p>25 that candidates of any race preferred by black</p>	<p style="text-align: right;">Page 44</p> <p>1 A. That was the first one; correct?</p> <p>2 Q. That's right.</p> <p>3 A. Yeah. That was -- that was to</p> <p>4 begin the process of taking input from the</p> <p>5 public on what they would like to see in the</p> <p>6 plans and announce how people could submit</p> <p>7 plans to the reapportionment committee. And</p> <p>8 also, once again, put the guidelines out</p> <p>9 before the committee so we could vote on them</p> <p>10 again. We had to adopt them because the last</p> <p>11 set of guidelines, just like the committee</p> <p>12 chairmanships had to be redone because that</p> <p>13 quadrant they're adopted under ended.</p> <p>14 Q. Did you attend that hearing?</p> <p>15 A. I believe I chaired it.</p> <p>16 Q. Do you recall individuals at that</p> <p>17 hearing offering testimony or comment?</p> <p>18 A. Oh, yes.</p> <p>19 Q. Do you recall any individuals</p> <p>20 testifying about the need for a second</p> <p>21 district in which minority voters could elect</p> <p>22 a candidate of their choice?</p> <p>23 A. I believe the attorneys for the</p> <p>24 plaintiffs did an excellent job of preparing</p> <p>25 their people to come to the microphone and</p>

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<p style="text-align: right;">Page 45</p> <p>1 read very well written prepared texts, yes. 2 Q. Is it your position that folks who 3 requested there be two districts where black 4 preferred candidates could prevail is the 5 product of plaintiff's attorneys and not 6 community input? 7 A. The ones I saw were clearly 8 reading talking points that I remember. 9 There might have been one two that came in 10 just in passing speeches, but the majority of 11 them were reading prepared scripts, yes, 12 which is fine. You know, that's the process. 13 They came in. They were the plaintiffs. 14 They had well-written positions, and they 15 delivered them to the committee. And we 16 listened. 17 Q. Did that reduce the weight that 18 you accorded that testimony? 19 A. The what? 20 Q. Did that reduce in any way the 21 weight that you accorded to that testimony? 22 A. No. 23 Q. Do you remember -- actually 24 scratch that. I'll rephrase. 25 Were there any witnesses who you</p>	<p style="text-align: right;">Page 47</p> <p>1 to talk about the reapportionment committee 2 meeting that was held on July 27th. Do you 3 recall that meeting? 4 A. Yes. 5 Q. Okay. Did you do anything to 6 prepare for it? 7 A. Put together an agenda. 8 Q. Did you talk to anybody about it 9 ahead of time, I assume? 10 A. Not particularly. We just made 11 a list of what we needed to talking about. 12 Q. Okay. What happened at that 13 meeting, as you remember it? 14 A. If I remember correctly, we 15 adopted the guidelines and then presented 16 plans. 17 Q. Let's turn to the guidelines 18 themselves. 19 MR. LOCKHEAD: And I'm going to 20 ask you to display what's been marked as 21 Exhibit C at page 104. 22 MR. ROSBOROUGH: Give my one 23 second. I'm trying to locate that. 24 Q. (By Mr. Lockhead) Representative 25 Pringle, do you see a document displayed on</p>
<p style="text-align: right;">Page 46</p> <p>1 had a relationship with before the public 2 hearing that you knew who came to testify or 3 offer public comment? 4 A. I knew Dr. Joe Reed and the 5 gentleman from Blakeley State Park, the 6 historian. I never met him personally, but 7 he came on my request to talk about Mobile 8 and Baldwin being a community of interest and 9 being together for generations. 10 Q. And why did you request his 11 testimony? 12 A. Because he's a well-known 13 historian that's written extensively about 14 the history of the Gulf Coast and Mobile and 15 Baldwin County. 16 Q. Did you request the testimony of 17 anyone who spoke the need for two districts in 18 which minority voters could elect a candidate 19 of their choice? 20 A. No. 21 Q. Let's turn to the guidelines. You 22 mentioned those earlier. I think that's 23 right; is that right? 24 A. Yes. 25 Q. Okay. And in particular, I want</p>	<p style="text-align: right;">Page 48</p> <p>1 your screen with the title reapportionment 2 committee redistricting guidelines? 3 A. Yes. 4 (Whereupon, Exhibit C was marked 5 for identification.) 6 Q. (By Mr. Lockhead) And the date 7 below it, is that May 5th, 2021? 8 A. Yes. 9 Q. Do you recognize this document? 10 A. Those are basically the same 11 guidelines the democrats adopted in the 1990s 12 because I served on this committee in 1998 13 and remember basically the same exact 14 committee guidelines from when the democrats 15 were the super majority and originally 16 drafted them, yes. 17 Q. Are these also the guidelines from 18 2023 just reenacted from 2021? 19 A. They're basically the same ones 20 from the 1990s and enacted by the democrats, 21 yes. They've not been changed. They've been 22 tweaked a little bit, but not much at all. 23 Substantially exactly the same. 24 Q. Why do you think that they've 25 stayed almost exactly the same since the '90s?</p>

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<p style="text-align: right;">Page 49</p> <p>1 A. Well, I mean, I hate to say 2 this, but obviously the democrats did a good 3 job when they drew them in the '90s. 4 Q. Why do you hate to say that? 5 A. Because I'm a republican. You 6 know, I just -- you know, they cover all the 7 bases. 8 Q. Did you see any need to revisit 9 them or amend them for purposes of the 2023 10 redistricting cycle? 11 A. We always look to see if the 12 Court has changed anything or if they need -- 13 if the law has been changed and we need to 14 tweak them. 15 Q. Was that the case between 2021 and 16 2023 when you readopted them? 17 A. I don't think -- the guidelines 18 are fine. 19 Q. Do you expect when folks draw maps 20 or present them to the legislature that those 21 maps comply with these guidelines? 22 A. I don't know. I can't answer 23 what other people do. 24 Q. But it's important if they do 25 generally; is that fair?</p>	<p style="text-align: right;">Page 51</p> <p>1 when we were doing it, I know I offered an 2 amendment to the guidelines that clearly 3 stated we could not reduce the number of 4 majority minority districts in the State of 5 Alabama. And Senator Smitherman tabled my 6 motion. So you've always got some -- some 7 amendment being offered to them at some point 8 in time. 9 Q. Why did you offer that amendment? 10 A. Because I thought it was 11 important we retained the number of majority 12 minority districts in the State of Alabama we 13 had. 14 Q. Is that something you still think 15 is important today? 16 A. Yes. I mean, I've drawn 17 majority minority districts that have elected 18 white men to them. So we try. But we can't 19 guarantee outcomes. No matter what we draw, 20 the voters will ultimately decide who they 21 want to elect. 22 Q. Why is it important to you that 23 districts be drawn majority minority? 24 A. Because we had majority minority 25 districts for the legislature, and we're</p>
<p style="text-align: right;">Page 50</p> <p>1 A. They should, yes. They also 2 should comply with the 14th amendment and the 3 Voting Rights Act too. 4 MR. LOCKHEAD: If we can, let's go 5 ahead and take down Exhibit C and then bring 6 up what's been marked as Exhibit D. Actually, 7 let's pause. Let's not bring that up quite 8 yet. 9 Q. Representative Pringle, how 10 commonly would you say folks offer amendments 11 to the redistricting guidelines? 12 A. How commonly? I'm sure when you 13 go through the reapportionment process, 14 somebody's always going to offer an amendment 15 of some sort. I remember back in '98 I 16 offered an amendment that said we could not 17 do -- we could not reduce the number of 18 minority districts in the legislature in 19 redistricting. We had to maintain all the 20 minority seats and Senator Smitherman tabled 21 my motion. 22 Q. I'm sorry. Could you explain a 23 little bit more? So just walk me through that 24 process. 25 A. Back in probably it was 2000</p>	<p style="text-align: right;">Page 52</p> <p>1 trying to maintain the number of minority 2 districts we have. 3 MR. LOCKHEAD: Let's go ahead and 4 pull up Exhibit D if we can. 5 (Whereupon Exhibit D was marked 6 for identification.) 7 Q. (By Mr. Lockhead) Representative 8 Pringle, do you see the document on your 9 screen here that's titled, proposed amendment 10 to reapportionment committee guidelines? 11 A. Yes. 12 Q. Do you recognize this? 13 A. That was offered by 14 Representative England. 15 Q. Okay. Do you recall considering 16 this appointment during the process for 17 considering the guidelines in 2023? 18 A. Yes. 19 Q. Do you recall the vote on this 20 amendment? 21 A. No. 22 Q. Did you vote for it or against it? 23 A. I voted against it. 24 Q. And why is that? 25 A. Because, if you read our</p>

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<p style="text-align: right;">Page 53</p> <p>1 guidelines, it automatically says we must</p> <p>2 comply with the 14th amendment of the</p> <p>3 Constitution and the 1965 Voting Rights Act.</p> <p>4 And I saw no need for this. The guidelines</p> <p>5 already say that we have to comply with the</p> <p>6 14th amendment and the Voting Rights Act.</p> <p>7 Q. Would you say that this is a fair</p> <p>8 understanding of what the 14th amendment and</p> <p>9 Voting Rights Act requires of you?</p> <p>10 A. Repeat your question.</p> <p>11 Q. Sure. Would you say that this</p> <p>12 amendment accurately reflects what the Voting</p> <p>13 Rights Act and 14th amendment requires of you,</p> <p>14 so it was simply redundant?</p> <p>15 A. Yes.</p> <p>16 MR. LOCKHEAD: All right. We can</p> <p>17 go ahead and take that down.</p> <p>18 Q. Now, I want to talk a little bit</p> <p>19 about communities of interest, if we can.</p> <p>20 First, what is the Wiregrass?</p> <p>21 A. That would be the southeast</p> <p>22 corner of the State of Alabama. Down in --</p> <p>23 anchored over in Dothan.</p> <p>24 Q. What counties are in it?</p> <p>25 A. Oh, Lord. Henry, Houston,</p>	<p style="text-align: right;">Page 55</p> <p>1 outside of Mobile and Baldwin County? And we</p> <p>2 have a major bridge that's going to be built</p> <p>3 because so many of the people in Mobile and</p> <p>4 Baldwin County, they live in one county and</p> <p>5 work in the other. The Mobile Ballet is</p> <p>6 housed in Daphne, Alabama, which is in</p> <p>7 Baldwin County. We are inextricably linked</p> <p>8 together as a community of interest. 40</p> <p>9 percent of the employees at Austal USA live</p> <p>10 in Baldwin County. I think Airbus is about</p> <p>11 the same. The major employers here live</p> <p>12 in -- you know, people cross the bay</p> <p>13 constantly for work, for school. The</p> <p>14 University of South Alabama has a campus in</p> <p>15 Baldwin County. It's main campus is in</p> <p>16 Mobile, but it has a branch in Baldwin</p> <p>17 County.</p> <p>18 Q. You mentioned two statistics in</p> <p>19 particular; one about Airbus and another about</p> <p>20 a different company. What was that second</p> <p>21 company?</p> <p>22 A. Airbus and Austal, the ship</p> <p>23 builders.</p> <p>24 Q. Do you recall when you received</p> <p>25 information about the proportion of employees</p>
<p style="text-align: right;">Page 54</p> <p>1 Geneva, Pike. I can't remember them all now.</p> <p>2 I'm sorry.</p> <p>3 Q. What about the Gulfport (sic)</p> <p>4 region, what's that?</p> <p>5 A. Gulfport is in Mississippi.</p> <p>6 Q. Would you say that it's -- go</p> <p>7 ahead.</p> <p>8 A. You said the Gulfport region.</p> <p>9 Gulfport is in Mississippi. You mean the</p> <p>10 Gulf Coast region?</p> <p>11 Q. That's right.</p> <p>12 A. Just a technicality.</p> <p>13 Q. I'm not from Alabama, you can</p> <p>14 tell.</p> <p>15 A. It's a community of interest. I</p> <p>16 mean, we've been linked together for</p> <p>17 generations. I mean, you have to remember,</p> <p>18 we're boarded on the west by Mississippi.</p> <p>19 We're boarded on the east by Florida. And to</p> <p>20 the south is the Gulf of Mexico. We're</p> <p>21 squeezed in just one little geographic area</p> <p>22 the State of Alabama. Because of that, we're</p> <p>23 inextricably linked together through history</p> <p>24 and through culture. I mean, who else has a</p> <p>25 Mardi Gras parade in the state of Alabama</p>	<p style="text-align: right;">Page 56</p> <p>1 that work across that particular region? How</p> <p>2 did you learn that?</p> <p>3 A. I read in the Lagniappe</p> <p>4 Newspaper when the county was debating on</p> <p>5 giving a \$10 million tax break to Airbus or</p> <p>6 Austal, one of the two. And the comment was</p> <p>7 that some of the county commissioners and</p> <p>8 city council members were concerned because</p> <p>9 such a large percentage of the people who</p> <p>10 work there lived in Baldwin County. I'll</p> <p>11 tell you, the most interesting -- if you read</p> <p>12 the paper down here, the chairman of the</p> <p>13 Baldwin County Democratic Conference is</p> <p>14 quoted as saying Mobile and Baldwin County</p> <p>15 are communities of interest and should not be</p> <p>16 divided in a congressional district. And</p> <p>17 that's the chairman of the Baldwin County</p> <p>18 ADC.</p> <p>19 Q. And what about the Black Belt,</p> <p>20 what counties are in that?</p> <p>21 A. They're about 18 counties.</p> <p>22 Wilcox, Monroe, Lowndes, Macon County,</p> <p>23 Crenshaw, Butler. I can't name them all.</p> <p>24 I'm sorry. I'm not good at Alabama</p> <p>25 geography. I should be better.</p>

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<p style="text-align: right;">Page 57</p> <p>1 Q. Would you say the Black Belt is a 2 historic community of interest? 3 A. I would say, yeah. I mean, 4 they -- they have a lot in common, yes, they 5 do. You know, I work for Southern 6 Timberland. So I've traveled all through 7 Wilcox -- I work in Wilcox County all the 8 time. And, in fact, I've got a project in 9 Wilcox right now that I'm working on. So I'm 10 up there a lot. 11 Q. Let's -- if we can, Representative 12 Pringle, move to the second public hearing 13 held on July 13th. Do you recall a hearing on 14 that day? 15 A. I recall hearings. I don't 16 remember the dates. 17 MR. LOCKHEAD: If we can, let's 18 pull up what's been marked as Exhibit F. 19 THE WITNESS: What date is this? 20 Q. (By Mr. Lockhead) July 13th. 21 (Whereupon, Exhibit F was marked 22 for identification.) 23 Q. Representative Pringle, do you see 24 a document on your screen? 25 A. Yes.</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. And why not? 2 A. Well, I was taking public input 3 on what they wanted, and I don't know how I 4 could produce a plan until I finished hearing 5 from the public. 6 Q. Why do you think that the plans 7 were considered at this hearing, the other 8 four? Had they not been sufficiently publicly 9 vetted? 10 A. Well, those are the plaintiffs' 11 plans. They didn't have to have public 12 hearings when they drew theirs. Theirs were 13 all drawn off campus. I have no clue who 14 drew them. I don't know what consultant was 15 hired or what lawyer was hired to draw those 16 plans, and they didn't have to take public 17 input. They could do whatever they wanted. 18 Q. And this was the second hearing; 19 correct? So there was a hearing before this, 20 so there was an opportunity for public input 21 on plans that you may have participated in 22 drafting? 23 A. Well, the first part was just to 24 get the process started. And this one, we 25 had some plans that had been submitted, so we</p>
<p style="text-align: right;">Page 58</p> <p>1 Q. That appears to been an agenda. 2 A. Yes. 3 Q. Do you recognize this? 4 A. Yes. 5 Q. What is it? 6 A. It's the agenda for the July 7 13th reapportionment committee meeting. 8 Q. Okay. And do you see agenda item 9 5-B? 10 A. "Plans being discussed today 11 are," yes. 12 Q. And those four plans, could you 13 briefly read those out? 14 A. *ERA plans remedial map, CLC 15 map, singleton congressional plan 3, and 16 hatcher remedial congress plan 1. 17 Q. Were those the only four maps that 18 were discussed at this hearing? 19 A. Yes, sir. That was the very 20 beginning of the process, yes. 21 MR. LOCKHEAD: Okay. We can go 22 ahead and take down that exhibit. 23 Q. Did you submit any plans for 24 purposes of this hearing? 25 A. No.</p>	<p style="text-align: right;">Page 60</p> <p>1 knew we were going to have a lot. So we 2 started going through them. 3 Q. Did you suggest to anyone that 4 they not put forward a plan at this hearing? 5 A. No. 6 Q. Did you discuss the decision about 7 whether to put forward your community of 8 interest plan at this hearing? Did you 9 discuss that decision with anyone? 10 A. I did not have a plan ready at 11 the time. 12 Q. Do you recall any witnesses who 13 spoke at the public portion of that hearing? 14 A. Not off the top of my head, no. 15 Q. I'll represent to you that I 16 believe Mike Schmitz, major of Dothan, Jeff 17 Brannon, local businessman spoke. Do you -- 18 do those names sound familiar? 19 A. Now that you bring them up, yes. 20 Q. Did you have relationships with 21 either of those folks beforehand? 22 A. No. 23 Q. Did you speak to anybody about 24 testifying at that hearing? 25 A. Like I said, gentleman from</p>

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1 Blakeley State Park, or Blakeley Park, I
2 asked to come because of his expertise and
3 history of Mobile and Baldwin County. But I
4 talked to him on the phone. And I laid eyes
5 on him about five minutes before that meeting
6 started for the first time in my life, and
7 I've not seen or spoken to him since.
8 Q. Okay. Do you recall a plan
9 titled, the extended Black Belt plan that was
10 considered during the course of this hearing?
11 A. No.
12 MR. LOCKHEAD: Okay. If we can,
13 let's go ahead and pull up the exhibit marked
14 extended Black Belt.
15 (Whereupon, Exhibit X was marked
16 for identification.)
17 Q. (By Mr. ^ Attynname) Representative
18 Pringle, do you see that on your screen, a
19 document titled -- if we can go zoom in a
20 little bit.
21 THE WITNESS: I can see it.
22 Q. -- title expanded Black Belt plan.
23 Do you recognize this?
24 A. I believe I've seen it before, _____
25 but that's all.

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1 Q. Where do you believe you saw it
2 before?
3 A. I believe I saw it in one of the
4 committee meetings.
5 Q. Do you know who drew it?
6 A. No.
7 MR. LOCKHEAD: Okay. You can go
8 ahead and take that down. Likewise, let's
9 pull up the plan called Russell split plan.
10 (Whereupon, Exhibit Y was marked
11 for identification.)
12 Q. (By Mr. Lockhead) Representative
13 Pringle, do you see this document here map
14 titled Russell split plan?
15 A. Yes.
16 Q. Do you recognize this?
17 A. I have seen it before, yes.
18 Q. And what is it?
19 A. It's a plan, I believe -- it's a
20 variation of a plan drawn by Randy Hinaman.
21 Q. How do you know this plan was
22 drawn by Randy Hinaman?
23 A. I just remember him talking
24 about it. Plus I watched him on his
25 interview.

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1 Q. Which interview was that?
2 A. This one. His deposition.
3 Q. Great. And for the record, you
4 attended the entire duration of Mr. Hinaman's
5 deposition earlier today; is that correct?
6 A. Not the entirety of it, no.
7 Q. How much of it would you say?
8 A. I'd say 90 percent maybe.
9 Q. Okay.
10 A. I was --
11 Q. Did you speak to Mr. Hinaman about
12 this plan?
13 A. Not that I remember specifically
14 about it, no.
15 Q. Do you recall mentioning that this
16 was submitted by a member of the public?
17 A. No.
18 MR. LOCKHEAD: Okay. We can take
19 that down.
20 Q. All right. So, more generally,
21 can you talk about how you accounted for
22 public input at this meeting in the course of
23 coming to ground on a 2023 congressional map?
24 A. I'm not sure what you're asking
25 me. I'm sorry.

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1 Q. Did public input from this meeting
2 affect in any way your decisionmaking for
3 creating a new map in 2023?
4 A. I mean, yeah, I found it quite
5 fascinating the plaintiffs turning on each
6 other and fighting and to watch the
7 democratic members of the committee fight
8 amongst themselves over which plan they
9 wanted based on their own personal political
10 agendas.
11 Q. Did that affect the way that you
12 drew your map?
13 A. I wouldn't say that, no.
14 Q. So is it fair to say that nothing
15 from this public hearing contributed to the
16 way that you either drew your map or advanced
17 maps in the course of your work as cochair
18 with the redistricting committee?
19 A. Well, the public hearings made
20 perfectly clear that people wanted a district
21 they thought that blacks could elect a
22 candidate of their choosing. That's the
23 reason I drew the map -- Randy and I drew the
24 map we came up with.
25 MR. LOCKHEAD: Okay. If we can,



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<p style="text-align: right;">Page 65</p> <p>1 can we take maybe a five-minute break? Are</p> <p>2 folks all right with that? We've been going</p> <p>3 for a minute. Let's go off the record.</p> <p>4 MR. WALKER: Hey, Tanner, when do</p> <p>5 you want to come back?</p> <p>6 MR. LOCKHEAD: Let's come back at</p> <p>7 5:15? Does that sound okay to everybody?</p> <p>8 MR. WALKER: Okay.</p> <p>9 MR. LOCKHEAD: Is that okay with</p> <p>10 you, Representative Pringle?</p> <p>11 THE WITNESS: That's fine.</p> <p>12 MR. LOCKHEAD: All right. Sounds</p> <p>13 good. Or sorry, 4:15.</p> <p>14 THE VIDEOGRAPHER: The time is</p> <p>15 4:10 p.m. We're going off the record.</p> <p>16 (A short break was taken.)</p> <p>17 THE VIDEOGRAPHER: The time is</p> <p>18 4:18 p.m. We're back on the record.</p> <p>19 Q. (By Mr. Lockhead) Representative</p> <p>20 Pringle, I want to turn to the committee</p> <p>21 meeting that was held on July 17th. The</p> <p>22 reapportionment committee held a committee</p> <p>23 meeting on July 17; is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Do you know what the</p>	<p style="text-align: right;">Page 67</p> <p>1 July 17th?</p> <p>2 A. It was referred to as the</p> <p>3 community of interest plan, yes.</p> <p>4 Q. Okay. And who drew that plan?</p> <p>5 A. Randy Hinaman.</p> <p>6 Q. All right. If you could turn to</p> <p>7 your screen, do you see a document --</p> <p>8 MR. WALKER: Tanner? Hello?</p> <p>9 MR. LOCKHEAD: Hello? My</p> <p>10 apologies. Let's go off the record.</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 4:21 p.m. We're going off the record.</p> <p>13 (A short discussion was held.)</p> <p>14 THE VIDEOGRAPHER: The time is</p> <p>15 4:28 p.m. We're back on the record.</p> <p>16 Q. (By Mr. Lockhead) Okay.</p> <p>17 Representative Pringle, on your</p> <p>18 screen, do you see a map that's titled Pringle</p> <p>19 congressional plan?</p> <p>20 A. Yes.</p> <p>21 Q. Do you recognize this map?</p> <p>22 A. Yes.</p> <p>23 Q. And what is it?</p> <p>24 A. It's the plan that I introduced</p> <p>25 in the Alabama House. It was commonly</p>
<p style="text-align: right;">Page 66</p> <p>1 purpose of that meeting was?</p> <p>2 A. It was to pass a plan out of the</p> <p>3 committee so we could introduce it that day</p> <p>4 into the special session that we were about</p> <p>5 to go into.</p> <p>6 Q. Did you take any notes at that</p> <p>7 meeting?</p> <p>8 A. I'm not a note taker. I mean,</p> <p>9 anything I wrote down was on the agenda that</p> <p>10 I turned over.</p> <p>11 Q. Okay.</p> <p>12 A. But it was very limited.</p> <p>13 MR. LOCKHEAD: All right. Let's</p> <p>14 go ahead and pull up what's been marked as</p> <p>15 Exhibit C at page 35.</p> <p>16 And actually, I'd like to make a</p> <p>17 quick note that the prior two exhibits, one</p> <p>18 previously called extended Black Belt, let's</p> <p>19 mark that as Exhibit X. The other is the</p> <p>20 Russell split plan, let's call that Exhibit Y.</p> <p>21 And now let's turn to what's been marked as</p> <p>22 Exhibit C at 35.</p> <p>23 Q. Okay. Representative Pringle, did</p> <p>24 you introduce a proposal of a Congressional</p> <p>25 redistricting plan at the committee meeting on</p>	<p style="text-align: right;">Page 68</p> <p>1 referred to in committee meetings as the</p> <p>2 community of interest plan.</p> <p>3 Q. For this community of interest</p> <p>4 plan, do you recall what the black voting age</p> <p>5 population in is congressional district 2?</p> <p>6 A. No.</p> <p>7 MR. LOCKHEAD: Okay. Let's scroll</p> <p>8 I believe one up from the map itself. Let's</p> <p>9 go to page 58.</p> <p>10 Q. Representative Pringle, do you see</p> <p>11 in front of you a piece of paper that says</p> <p>12 population summary with the plan name</p> <p>13 community of interest?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recognize this document?</p> <p>16 A. Yes.</p> <p>17 Q. And what is it?</p> <p>18 A. It was what I had before me</p> <p>19 because I remember writing Bill Cooper's name</p> <p>20 on it. I can't remember who he is, but I</p> <p>21 wrote his name. I think that was the name --</p> <p>22 anyway, yes, that's mine.</p> <p>23 Q. So does this describe the</p> <p>24 population summary of the community of</p> <p>25 interest plan that you introduced?</p>

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1 A. Yes.

2 Q. Do you see for district 2 the

3 black voting age population of approximately

4 42 percent?

5 A. 42.45, yes.

6 Q. And that's for congressional

7 district 2; correct?

8 A. Correct.

9 Q. Do you recall if there was any

10 racial polarization analysis that was

11 completed on this community of interest plan?

12 A. I don't recall a racial

13 polarization analysis. But I do recall a

14 performance analysis on voting.

15 Q. Okay. That performance analysis

16 was completed by Dr. Hood; is that correct?

17 A. I believe so, yes.

18 MR. LOCKHEAD: Okay. Let's pull

19 up that performance analysis which is still at

20 Exhibit C at page 62.

21 Q. Representative Pringle, do you see

22 a document in front of you with the header

23 community of interest plan?

24 A. Yes.

25 Q. Do you recognize this document?

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1 A. Yes.

2 Q. And what is it?

3 A. It's the performance analysis

4 that was given on my -- on my plan.

5 Q. Okay. So this contain analysis

6 for four elections; 2020 presidential, 2020

7 senate, 2018 governor, and 2018 attorney

8 general; is that correct?

9 A. Correct.

10 Q. Okay. Why were those the

11 elections that were chosen in particular for

12 the performance analysis?

13 A. I really couldn't tell you. I

14 didn't do it.

15 Q. And what did the analysis reveal

16 about the plan, in your own words?

17 A. In my own words, if the

18 democrats feel that a viable candidate is

19 funded, they win this election -- they can

20 win that district.

21 Q. Okay. So in CD-2, of the four

22 elections that were analyzed in this

23 performance analysis, in how many of those

24 four did the black preferred candidate win?

25 A. Two.

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1 Q. And you believe this plan provides

2 fair opportunity for black voters to elect a

3 candidate of their choice in a second

4 congressional district?

5 A. Yes.

6 Q. Okay. Is a district where black

7 voters preferred candidate has a one in four

8 chance of being elected an opportunity

9 district?

10 A. Not -- not my plan.

11 Q. I understand it's not your plan.

12 But is it your view that a district where

13 black voters preferred candidate has a one in

14 four chance of being elected an opportunity

15 district?

16 A. I believe my community of

17 interest is the one that does that.

18 Q. You believe your community of

19 interest plan has a one in four chance of

20 election or is an opportunity --

21 A. No. I believe my -- mine is the

22 one that provides the minorities -- blacks

23 the opportunity to elect a candidate of their

24 choosing. That's the reason why I supported

25 it.

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1 Q. Okay. Do you recall the

2 opportunity plan as another plan that was

3 introduced in committee on the 17th?

4 A. Yes.

5 Q. Did you know about that plan

6 before the 17th?

7 A. Yes.

8 Q. When did you learn about it?

9 A. When Senator Dan Roberts brought

10 a thumb drive into the committee room

11 claiming that all of our numbers were wrong,

12 that his consultant, Chris Brown, had drawn a

13 plan that had the right numbers, and we

14 needed to use his plan because everything we

15 had done was wrong.

16 Q. And what was the basis for that

17 view?

18 A. He had the wrong denominator in

19 his plan. So when he changed it to the

20 correct denominator, his plan linked exactly

21 with ours.

22 Q. And when you say "his plan," are

23 you referring to the opportunity plan?

24 A. That was drawn by Chris Brown

25 and brought by Dan Roberts, yes.

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<p style="text-align: right;">Page 73</p> <p>1 Q. Did you -- at what point was it 2 discovered that they, in fact, had the 3 incorrect data? 4 A. About two minutes after Randy 5 Hinaman started looking at it. He -- he 6 discovered the problem very quickly. 7 Q. Could you say just a word about 8 what that problem was? What do you mean by 9 denominator? 10 A. He was using, I think, the total 11 population denominator and not the black 12 voting age population denominator. 13 Apparently -- I'm just going to tell you. 14 Randy said this. Apparently Maptitude 15 automatically defaults back to total 16 population and not BVAP population, so... 17 Q. So it's your understanding then 18 that the plan, the opportunity plan, was just 19 created using incorrect information, and then 20 once it was presented to Mr. Hinaman, he 21 recognized that and expressed that to the 22 sponsors and to you? 23 A. Yes. And they changed the 24 denominator, and that's the numbers that 25 everybody saw. But Dan Roberts -- Senator</p>	<p style="text-align: right;">Page 75</p> <p>1 A. Yes. 2 Q. Do you recognize this document? 3 A. I'm sure I've seen it. 4 Q. And what is it? 5 A. It's -- it's something you put 6 up labeled opportunity. 7 Q. Okay. I'll represent to you that 8 this is the population summary for the 9 Livingston opportunity plan. If you look in 10 district 2 at the BVAP population, do you see 11 that number on the right side? 12 A. 38.31 percent. 13 Q. Okay. 14 And is this the population 15 summary, this data that reflects the map as it 16 was initially drawn by Senator Roberts? 17 A. I could not answer that. 18 Q. Okay. Was this pre or post error 19 correction? 20 A. I could not answer that. 21 Q. Okay. Who is Chris Brown? 22 A. He's a reapportionment political 23 consultant in Birmingham. 24 Q. Okay. Do you know who retained 25 him?</p>
<p style="text-align: right;">Page 74</p> <p>1 Roberts came in saying all of our plans were 2 wrong, that all of our numbers were -- 3 MR. WALKER: Chris -- 4 THE WITNESS: I'm sorry. I 5 should -- 6 MR. LOCKHEAD: Let's go ahead and 7 pull up what's been marked as Exhibit C. 8 Q. And Representative Pringle, I'm 9 sorry, just to confirm, is anyone speaking to 10 you in the room? 11 A. No. I'm alone. 12 Q. What about on the phone? 13 A. No. 14 Q. Okay. 15 A. You see me looking at the phone, 16 it's my employees blowing me up at work 17 because I haven't been there all day. 18 Q. I know the feeling. 19 A. No, you're getting paid. 20 MR. LOCKHEAD: Okay. Let's go to 21 Exhibit C at page 59. 22 Q. Okay. Now, Representative 23 Pringle, do you see this document in front of 24 you with, plan name, label opportunity? Do 25 you see that?</p>	<p style="text-align: right;">Page 76</p> <p>1 A. No. 2 Q. Do you know what he was instructed 3 to do? 4 A. No. 5 Q. Who was he working with? 6 A. Don't know. 7 Q. Was he working with Senator 8 Roberts, if they put this plan together? 9 A. I couldn't answer that. 10 Q. Okay. 11 Are you aware of any racial 12 polarization analysis done on this map prior 13 to the redistricting committee hearing or 14 meeting or at any point? 15 A. No. 16 Q. Was there any analysis you're 17 aware of how this map would have performed in 18 prior elections? 19 And by that, I mean, the ability 20 of black voters to elect a candidate of their 21 choice in two congressional districts? 22 A. No. 23 MR. LOCKHEAD: Okay. Let's go 24 ahead and pull up what's been marked as 25 Exhibit G.</p>

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<p style="text-align: right;">Page 77</p> <p>1 (Whereupon, Exhibit G was marked 2 for identification.) 3 Q. (By Mr. Lockhead) Representative 4 Pringle, do you see a document here titled 5 defendant, Steve Livingston's responses to 6 plaintiff's third set of interrogatories? 7 A. Yes. 8 Q. Do you recognize this? 9 A. Never seen it before. 10 Q. Okay. I'll represent to this that 11 was interrogatories submitted by Steve 12 Livingston in this case. 13 MR. LOCKHEAD: If we could scroll 14 down to interrogatory No. 7. Okay. And if we 15 could zoom in a little bit. 16 THE WITNESS: Can you scroll a 17 little bit? Down. I mean up. I'm sorry. 18 The other way. 19 Q. Okay. Interrogatory No. 7, do you 20 see the paragraph that starts with, identify 21 all memoranda? 22 A. Yes. 23 Q. Okay. So just to quickly read 24 that paragraph, this interrogatory asks to 25 identify all memoranda, reports, analyses,</p>	<p style="text-align: right;">Page 79</p> <p>1 report for this version of the -- for this 2 map? 3 A. No. 4 Q. Okay. Is that something that you 5 would find helpful in assessing whether this 6 map was compliant with the Voting Rights Act? 7 A. If I had seen it, possibly, yes, 8 but I never saw it. 9 Q. Okay. 10 A. I saw -- I never saw one. 11 Q. Did you ask for one? 12 A. No. 13 Q. Why not? 14 A. I didn't ask for it. 15 Q. Do you know why not? 16 A. No. 17 Q. Okay. Do you believe that this 18 plan -- the opportunity plan provides a fair 19 opportunity to black voters to elect preferred 20 candidates in the second congressional 21 district? 22 A. I don't know the answer to that 23 question. 24 Q. And why is that? 25 A. Because I never -- never looked</p>
<p style="text-align: right;">Page 78</p> <p>1 evaluation, or other documents relied upon in 2 evaluating the legislative remedial plans and 3 the VRA Plaintiff's remedial plan considered 4 by the joint legislative reapportionment 5 committee including, but not limited to, the 6 extent to which the plans provide black voters 7 the opportunity to elect their preferred 8 candidates and any performance functionality 9 or racially polarized voting analysis. Do you 10 see that? 11 A. Yes. 12 Q. Did I read that correctly? 13 A. Yes. 14 Q. Let's scroll down. Do you see 15 here for -- the opportunity plan at No. 2? 16 A. Yes. 17 Q. Does that read, I considered the 18 map, related population data and the 19 performance report for Dr. Hood? Do you see 20 that? 21 A. Yes. Yes, I see it. 22 Q. Do you know what the performance 23 report of Dr. Hood is referring to? 24 A. Not in this instance, no. 25 Q. Did you ever see that performance</p>	<p style="text-align: right;">Page 80</p> <p>1 or studied the opportunity plan. 2 MR. LOCKHEAD: Okay. Let's go 3 ahead and pull that down. Thank you, Davin. 4 Q. Okay. So next the house of 5 representatives held a hearing on 6 redistricting on July 19th; is that correct? 7 A. The house? Or they had the bill 8 on the floor of the house? 9 Q. Bill on the floor. Does that 10 sound right? 11 A. Yeah. Yeah. They had my bill 12 on the floor of the house on the 19th. 13 Q. Okay. Did you prepare at all for 14 that day? 15 A. Yes. 16 Q. How so? 17 A. Gathered my little file and went 18 down to the floor. 19 Q. Do you recall what was in your 20 little file? 21 A. Not much. I had the quote 22 that I -- about the Voting Rights Act, what 23 the Court ruled, two majority districts or 24 something close thereof that provided an 25 opportunity. And I had my map. And I had</p>

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<p style="text-align: right;">Page 81</p> <p>1 that analysis that was given to me. Then I 2 had the population analysis. 3 Q. Okay. I want to ask were there 4 any other documents that you reviewed in 5 preparation for that proceeding on the floor? 6 A. Not that I recall. 7 MR. LOCKHEAD: Okay. Let's go 8 ahead and pull up Exhibit C one more time. 9 Thanks, Davin. 10 Q. Let's go to page 115. 11 A. Yes. 12 Q. All right. Senator Livingston 13 (sic), do you see a document here that begins 14 with the bullet point, the plaintiff's 15 consistently supported? 16 A. You mean Representative Pringle? 17 Q. I'm sorry. Apologies, 18 Representative Pringle. It's been a long day. 19 Let me start again. 20 A. Yes. And I do recall seeing 21 this, but I didn't have it on the floor with 22 me that day. 23 Q. Okay. So you recognize this 24 document? 25 A. Yes. I remember seeing it.</p>	<p style="text-align: right;">Page 83</p> <p>1 guarantee that at all. 2 Q. And what's the basis for that 3 guess? 4 A. Just looks like something he 5 would write. 6 Q. And why is that? 7 A. It's his style. 8 Q. What about it? 9 A. Just very legal. 10 MR. LOCKHEAD: Let's go to page 11 117 of this same exhibit, Exhibit C. 12 Q. Representative Pringle, do you see 13 a document here that begins with the 2023 plan 14 as a communities of interest plan that's 15 crossed out in what appears to be a red pen? 16 A. Yes. 17 MR. LOCKHEAD: And can we scroll 18 to -- slowly through page 120 of the PDF? 19 Q. All right. Representative 20 Pringle, do you recognize this document? 21 A. No. 22 Q. Have you seen it before? 23 A. Not that I remember. 24 MR. LOCKHEAD: Okay. Let's now go 25 to page 121, also Exhibit C.</p>
<p style="text-align: right;">Page 82</p> <p>1 MR. LOCKHEAD: Let's scroll, if we 2 can, to the next page. 3 Q. Do you recognize this page as 4 well? 5 A. Again, it's a document I 6 remember glancing at. 7 Q. What is this document? 8 A. I don't know. It was some 9 talking points that were prepared. 10 Q. Okay. When did you first see this 11 document? 12 A. I don't remember. Sometime 13 during the special session. 14 Q. Do you recall if it was after the 15 committee held its meeting on the 17th? 16 A. I don't recall exactly when. 17 I'm sorry. 18 Q. Who shared this with you? 19 A. I don't remember. 20 Q. Do you know who prepared it? 21 A. No. 22 Q. Do you have any guesses about who 23 prepared it? 24 A. If I want me to flat guess, I 25 would guess Eddie LaCour, but I can't</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. All right. Do you see here at the 2 top of the page responses to possible 3 questions? 4 A. Yes. 5 Q. Do you recognize this document? 6 A. No. Not unless -- I don't 7 recognize this page, no. 8 Q. Okay. And take time to read it. 9 I recognize I'm throwing a lot of pieces of 10 paper at you. But so you do not -- you do not 11 recognize this document? 12 A. I do not recognize it, no. Not 13 at this time. 14 Q. Do you know what it is? 15 A. Responses to possible questions. 16 Q. Did you review that document 17 before the hearing? I assume not? 18 A. No, I don't remember seeing 19 this. I don't remember reading it. 20 MR. LOCKHEAD: Let's go back up to 21 page 115, if we can. 22 Q. So this document here, this is the 23 document that you represented may have been 24 drafted by Eddie LaCour. Did you review this 25 document in advance of the hearing on the</p>

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<p style="text-align: right;">Page 85</p> <p>1 floor?</p> <p>2 A. No. I might have looked at it,</p> <p>3 but I didn't study it.</p> <p>4 Q. Okay. And talk me through your</p> <p>5 decision not to study this in advance of going</p> <p>6 to the floor.</p> <p>7 A. I didn't feel the need to --</p> <p>8 need to.</p> <p>9 Q. Why is that?</p> <p>10 A. I didn't feel I needed to study</p> <p>11 it.</p> <p>12 MR. LOCKHEAD: Okay. Let's go</p> <p>13 ahead and pull that down. Thanks, Davin.</p> <p>14 Q. Next -- so the Senate passed a</p> <p>15 slightly different map, the Livingston 2 plan</p> <p>16 that was introduced by Senator Livingston, is</p> <p>17 that correct, to your understanding?</p> <p>18 A. Yes, to my understanding.</p> <p>19 MR. LOCKHEAD: Okay. Let's pull</p> <p>20 up Exhibit H, if we can.</p> <p>21 (Whereupon, Exhibit H was marked</p> <p>22 for identification.)</p> <p>23 Q. All right. And Representative</p> <p>24 Pringle, do you recognize this document here</p> <p>25 titled Livingston congressional plan 2, 2023?</p>	<p style="text-align: right;">Page 87</p> <p>1 be the same composition between those two</p> <p>2 plans?</p> <p>3 A. No.</p> <p>4 MR. LOCKHEAD: Okay. Let's zoom</p> <p>5 in, if we can, on CD-2. Thank you so much.</p> <p>6 Just one moment. Okay. Thank you so much.</p> <p>7 Q. So let's do this instead.</p> <p>8 Representative Pringle, do you</p> <p>9 have any reason to doubt that this is the same</p> <p>10 as the congressional district 2 in the</p> <p>11 opportunity plan?</p> <p>12 A. I played no part in either one</p> <p>13 of them, so I don't know.</p> <p>14 MR. LOCKHEAD: Okay. Let's go</p> <p>15 ahead and take down this exhibit. Thanks,</p> <p>16 Davin. Hopefully we can just move forward.</p> <p>17 We'll be speedy.</p> <p>18 Q. Okay. Representative Pringle, you</p> <p>19 were a member of the conference committee that</p> <p>20 was tasked with reconciling the plans that</p> <p>21 were passed by both the house and the senate;</p> <p>22 is that right?</p> <p>23 A. Correct.</p> <p>24 MR. LOCKHEAD: Okay. Let's go</p> <p>25 ahead and pull up Exhibit I.</p>
<p style="text-align: right;">Page 86</p> <p>1 A. Yes.</p> <p>2 Q. What is it?</p> <p>3 A. That's the plan that Senator</p> <p>4 Livingston passed out of the senate and sent</p> <p>5 it to the house.</p> <p>6 Q. And the Livingston plan, what is</p> <p>7 the relationship between the Livingston plan</p> <p>8 and the opportunity plan we reviewed a moment</p> <p>9 ago?</p> <p>10 A. I couldn't tell you.</p> <p>11 Q. Do you know if the Livingston plan</p> <p>12 relied on corrected data? This reflects</p> <p>13 correct data, is that correct, unlike the</p> <p>14 version that you suggested had incorrect data?</p> <p>15 A. I would assume so, yes. But I</p> <p>16 don't know.</p> <p>17 Q. Okay. Okay. So regarding CD-2,</p> <p>18 do you see that in the bottom right?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Do you recall any changes</p> <p>21 in CD-2 between the Livingston 2 plan and the</p> <p>22 opportunity plan?</p> <p>23 A. No.</p> <p>24 Q. Okay. Do you recall any</p> <p>25 discussion about whether, though, CD-2 should</p>	<p style="text-align: right;">Page 88</p> <p>1 (Whereupon Exhibit I was marked</p> <p>2 for identification.)</p> <p>3 Q. (By Mr. Lockhead) Do you recognize</p> <p>4 this document?</p> <p>5 A. I believe that's what came out</p> <p>6 of the conference committee, yes.</p> <p>7 Q. Okay. And so this document is</p> <p>8 titled Livingston congressional plan 3 or SBA</p> <p>9 (sic), is that a correct alternative name for</p> <p>10 this plan as you understand it?</p> <p>11 A. I thought it was SB-5.</p> <p>12 Q. I'm sorry. SB-5, I apologize.</p> <p>13 A. That's fine.</p> <p>14 Q. Is that right?</p> <p>15 A. What was your question again?</p> <p>16 Q. The Livingston congressional</p> <p>17 plan 3 you see here on the screen, that is the</p> <p>18 map that was ultimately enacted by the</p> <p>19 legislature; is that correct?</p> <p>20 A. I believe so, yes.</p> <p>21 Q. Okay. Also known as SB-5?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Okay.</p> <p>24 MR. LOCKHEAD: Give me one moment.</p> <p>25 Okay. Let's pull up what's been marked as</p>

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<p style="text-align: right;">Page 89</p> <p>1 Exhibit J. Thanks, Davin. 2 (Whereupon, Exhibit J was marked 3 for identification.) 4 Q. (By Mr. Lockhead) All right. 5 Representative Pringle, I want to the turn to 6 be text of SB-5 as it was reported from 7 conference committee and ultimately passed by 8 the legislature. Do you see the document here 9 entitled SB-5 enrolled? 10 A. Yes. 11 Q. Okay. And do you recognize this 12 document? 13 A. Yes. 14 Q. Do you -- what is it? 15 A. I mean, that was the copy of the 16 bill they handed to me on the floor of the 17 house when -- that bill came up before the 18 house. 19 MR. LOCKHEAD: Okay. Can we 20 scroll to the bottom, please? Great. 21 Q. And Representative Pringle, I'll 22 represent to you that this is the enacted 23 legislation, the text of SB-5. Do you see 24 there the signature, the relevant signatures? 25 A. Yes.</p>	<p style="text-align: right;">Page 91</p> <p>1 Q. Did you know that these would be 2 put in the bill? 3 A. No, sir. 4 Q. Did the redistricting committee 5 solicit anyone to draft these findings? 6 A. No, sir. 7 Q. Do you know why they're in here? 8 A. No. 9 Q. Remind me, have you ever seen 10 another redistricting bill contain similar 11 language like this, these findings? 12 A. Not to my knowledge, no. 13 Q. What about identified communities 14 of interest? 15 A. No, not to my knowledge. Not 16 that I can remember. 17 Q. Not that you can remember. 18 Okay. This statement of 19 legislative intent does not include any 20 reference to VRA compliance, is that correct, 21 to your knowledge? 22 A. I couldn't say. I didn't write 23 them. I had nothing to do with that. 24 Q. Okay. 25 MR. LOCKHEAD: Let's scroll to the</p>
<p style="text-align: right;">Page 90</p> <p>1 MR. LOCKHEAD: Okay. Let's scroll 2 up to the second page of the text of SB-5. 3 Great. 4 Q. If you could, please look at 5 line 15. 6 A. Yes. 7 Q. The sentence says, the legislature 8 finds and declares the following. Do you see 9 that? 10 A. Yes. 11 MR. LOCKHEAD: Okay. And then if 12 we could slowly scroll for the next couple 13 pages. 14 Q. And as we do so, Representative 15 Pringle, just take a look. 16 MR. LOCKHEAD: Let's go a few 17 pages down. Okay. Thank you so much. 18 Q. Representative Pringle, these are 19 the legislature findings; is that right? 20 A. That's what was written in the 21 bill, yes. 22 Q. Okay. Do you know who drafted the 23 statement of legislative intent and findings 24 here? 25 A. No, sir.</p>	<p style="text-align: right;">Page 92</p> <p>1 findings recognizing three communities of 2 interest; Black Belt, Gulf Coast, and 3 Wiregrass, which should be starting in this 4 area. Great. 5 Q. So I'll represent to you that 6 these findings recognize three communities of 7 interest, the Black Belt, the Gulf Coast and 8 the Wiregrass. Do you see the definition of 9 the Black Belt here starting on the top of 10 page 5, the Black Belt is characterized? 11 A. I see the paragraph, yes. 12 Q. Okay. Okay. 13 Let's go to the section that 14 describes -- scratch that. Let's do this 15 instead. 16 Remind me again, Representative 17 Pringle, you -- you had not seen this before 18 this was enacted; that's right? 19 A. The first time I saw that was 20 Friday morning on the floor of the house when 21 the senate bill was brought up. I turned and 22 asked the clerk to give me a copy of the 23 bill. 24 Q. Do you think it's necessary for 25 the bill to include this?</p>

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<p style="text-align: right;">Page 93</p> <p>1 A. That's a senate bill. You need 2 to talk to the senators. 3 Q. Well, this was the bill that was 4 ultimately passed out of the house; is that 5 right? 6 A. It was sent to the house from 7 the senate. 8 Q. Did you vote for it? 9 A. Yes. 10 Q. Did you think it was necessary 11 when you decided to vote for it? 12 A. Yes. I thought it was necessary 13 for us to pass a bill. 14 Q. Okay. Do these conflict with the 15 redistricting principles that were adopted in 16 2023? 17 A. I had very quick -- some of them 18 looks like they are, some of the 19 redistricting principles. But there's other 20 stuff added, and I haven't analyzed what was 21 added to it. 22 Q. Okay. Could legislators have 23 satisfied the criteria that are enumerated in 24 SB-5 without knowing what those criteria were 25 beforehand?</p>	<p style="text-align: right;">Page 95</p> <p>1 Livingston congressional plan 3 population 2 summary? 3 A. Yes. 4 Q. And do you recognize this to be 5 the statistics that were calculated based on 6 the map SB-5? 7 A. I believe that's what I saw 8 Friday morning on the floor, yes. 9 Q. Okay. Can you read for me, the 10 BVAP that's contained in CD-2? 11 A. Let me ask -- is this the -- is 12 this the bill, or is this conference 13 committee report or analysis? 14 Q. So I'll represent to you that this 15 is the analysis that was performed on the map 16 here, Livingston 3. 17 A. Okay. I see it. Go ahead. 18 Q. So here do you see the BVAP in 19 CD-2? 20 A. 39.93. 21 Q. Okay. And you mentioned earlier 22 that you saw a performance analysis of SB-5; 23 is that correct? 24 A. On that Friday morning, yes. 25 Q. Okay. And that was performed by</p>
<p style="text-align: right;">Page 94</p> <p>1 A. Explain the question. 2 Q. In other words, there are -- you 3 said that these are not identical with the 4 guidelines; is that correct? 5 A. I don't believe so, but I 6 haven't analyzed them line for line. 7 Q. Okay. And you would need to see 8 the guidelines in order to know how to comply 9 with the guidelines; is that right? 10 A. I would like to compare the two. 11 MR. LOCKHEAD: Okay. Let's go 12 ahead and take this down. Okay. Let's pull 13 up the exhibit we just looked at, which is 14 Exhibit I, the map version of SB-5. 15 MR. ROSBOROUGH: Sorry, one 16 second. 17 Q. (By Mr. Lockhead) Okay. 18 Representative Pringle, this is 19 the map of SB-5 we were just reviewing; is 20 that right? 21 A. I believe that's the final 22 version, yes. 23 MR. LOCKHEAD: Okay. Let's scroll 24 down one page and rotate it if we can. 25 Q. Do you see this page here titled</p>	<p style="text-align: right;">Page 96</p> <p>1 Dr. Hood? 2 A. I believe so, yes. 3 Q. Okay. I want to ask about what 4 that analysis showed. 5 MR. LOCKHEAD: So if we could pull 6 up Exhibit K. 7 (Whereupon Exhibit K was marked 8 for identification.) 9 Q. (By Mr. Lockhead) Do you recognize 10 this document here? 11 A. I believe I've seen it, yes. 12 Q. And what is it? 13 A. It's a -- it's a voting analysis 14 of the plan. 15 Q. Is this the analysis that you were 16 referring to earlier that you saw just before? 17 A. I believe it is, but I've looked 18 at so many documents. I would assume that 19 was what I saw Friday morning on the floor, 20 yes. 21 Q. So here we have a performance 22 analysis of seven elections; is that correct? 23 Do you see that? 24 A. Yes. 25 Q. Okay. Here, looking at each of</p>

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<p style="text-align: right;">Page 97</p> <p>1 these seven elections, black preferred 2 candidates lost all seven elections in the new 3 opportunity district of congressional district 4 2; is that correct? 5 A. According to that, yes. 6 Q. So, in fact, this analysis shows 7 that black preferred candidates never won in 8 this new opportunity district; is that fair? 9 A. What I'm seeing on this 10 analysis, that is correct. 11 Q. Okay. Were all members of the 12 conference aware of this analysis? 13 A. I believe so, yes. 14 Q. Were members of the legislature to 15 the best of your knowledge? 16 A. I couldn't answer that question. 17 Q. Okay. 18 A. I did not see it until literally 19 that morning. 20 Q. In your view, is a district where 21 black preferred candidates win zero of seven 22 elections an opportunity district? 23 A. I'm not an attorney, so I'm 24 going to leave that to the Courts. 25 Q. What about in your not legal view,</p>	<p style="text-align: right;">Page 99</p> <p>1 A. I believe my plan complied with 2 the Court order, yes, sir. 3 Q. So let's understand the 4 decisionmaking process in the conference 5 committee given the options that were on the 6 table. So first was the community of interest 7 plan, your plan, originally passed by the 8 house with a BVAP and CD-2 of 42.4 percent. 9 Does that sound right? 10 A. Yes, sir. 11 Q. Okay. And that map occasionally 12 performs for black preferred candidates, is 13 that right, two of four elections thereabout? 14 A. According to that analysis, yes. 15 Q. Okay. And the next was the 16 Livingston 2 plan which was originally passed 17 by the senate. Does that sound right? 18 A. Yes. 19 Q. Okay. And that plan, the BVAP and 20 CD-2 was 38.3 percent. Does that sound 21 correct to you? 22 A. Yes, sir. 23 Q. Okay. And then ultimately what 24 was enacted and what came out conference 25 committee was SB-5, and the BVAP in</p>
<p style="text-align: right;">Page 98</p> <p>1 but just in your personal view, does that 2 constitute a real opportunity to elect a 3 candidate of choice in zero of seven 4 elections? 5 A. You're asking me to speculate. 6 And I just don't want to speculate. 7 Q. Just not to speculate. I mean, 8 is -- 9 A. I just -- I'm not going to 10 speculate. 11 Q. So let's understand -- you know, 12 would you say that there was a meaningful 13 difference in opportunity between the 14 performance analysis that you see here for 15 SB-5 and the performance analysis that 16 accompanied your plan, the community of 17 interest plan? 18 A. I think my house plan was far 19 superior to any other plan. 20 Q. Would you say it provided a 21 greater opportunity to elect candidates of 22 choice for black voters than this bill, SB-5? 23 A. I believe my plan complied with 24 what the Court asked us to do, yes. 25 Q. So that's a yes?</p>	<p style="text-align: right;">Page 100</p> <p>1 congressional district 2 and SB-5 was 39.9 2 percent; is that correct? 3 A. It sounds correct. 4 Q. Okay. And that map never 5 performed for black preferred candidates in 6 the second congressional district according to 7 the performance analysis we just viewed; is 8 that fair? 9 A. Yes, sir. 10 Q. Okay. So in CD-2, your community 11 of interest plan had a BVAP of 42 percent. 12 Livingston 2 had a BVAP of 38 percent. And 13 SB-5 basically split the difference at 39.9. 14 Does that sound fair to you? 15 A. About correct, yes, sir. 16 Q. Okay. Why did you take that 17 approach? 18 A. Again, I drew a plan that I 19 thought would comply with what the Courts 20 ordered us to do. But I was only the 21 chairman of the house. What I could get 22 passed at the house, I could not get passed 23 at the Senate. The Senate made it perfectly 24 clear they were not going to pass my plan, 25 they were going to pass their plan. And we</p>

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<p style="text-align: right;">Page 101</p> <p>1 made the decision that it was more 2 important -- we had to pass something and not 3 just go to Montgomery and completely fail and 4 not pass a plan. So the decision was we 5 couldn't pass the house plan, so we had to 6 pass the senate plan. 7 Q. And what's the significance of the 8 39.9 BVAP in SB-5, just that it passed? 9 A. That's what the senate came up 10 with, and they were not going to allow us to 11 pass the house plan. 12 Q. Do you know why they chose that 13 number? 14 A. You're going to have to talk to 15 Senator Livingston and Eddie LaCour. 16 Q. Did they mention anything to you? 17 A. No. 18 Q. Okay. Let's go ahead and -- 19 A. Well, let me say -- let me 20 rephrase that. Senator Livingston came to me 21 towards the end and said, we're going to take 22 your plan and substitute my bill and pass 23 your plan with my map in it. And I said, no 24 we're not. If you want to pass a senate 25 plan, you're going to pass the senate on the</p>	<p style="text-align: right;">Page 103</p> <p>1 Congressional Maps? 2 A. Yes. 3 Q. Do you recognize this article? 4 A. No. 5 Q. Did you read it before? 6 A. No. 7 MR. LOCKHEAD: Okay. Let's scroll 8 in and then -- I'm sorry. Zoom in and scroll 9 down, if we can. 10 Q. Okay. I'm going to read the 11 paragraph starting, Livingston said. Do you 12 see that paragraph? 13 A. Yes. 14 Q. Okay. So "Livingston said senate 15 republicans began working on their own map 16 because the committee 'got some information' 17 that led them to prioritize 'compactness and 18 communities of interest being as important as 19 the black voting age population.' Livingston, 20 who did not say where the information came 21 from, said that he had not heard concerns from 22 senators about districts being over 40 percent 23 black." Did I read that right? 24 A. Yes, sir. 25 Q. Okay. Do you know what "some new</p>
<p style="text-align: right;">Page 102</p> <p>1 senate bill number, and you're not going to 2 put my name on it. You're going -- it's not 3 going to be a house bill number, it's going 4 to be a senate bill number, that's what we're 5 going to pass. 6 Q. And why didn't you want your name 7 on it? 8 A. Because I thought my plan was a 9 better plan. 10 Q. In terms of its compliance with 11 the Voting Rights Act? 12 A. Exactly. 13 MR. LOCKHEAD: Let's, if we can, 14 pull up the exhibit labeled Birmingham Watch. 15 COURT REPORTER: I'm sorry, 16 Counsel. Are you going to label this an 17 exhibit letter? 18 MR. LOCKHEAD: Let's call this 19 Exhibit Z. 20 (Whereupon, Exhibit Z was marked 21 for identification.) 22 Q. (By Mr. Lockhead) Okay. 23 Representative Pringle, do you see 24 a document here, a news article, with the 25 title, Alabama House Senate Approved Separate</p>	<p style="text-align: right;">Page 104</p> <p>1 information" refers to? 2 A. No, sir. I was not privy to it. 3 Q. Was there any information that you 4 received that you think this could refer to, 5 even if you're not sure exactly? 6 A. No, sir. After the initial 7 meeting, I never met with the republican 8 members of the committee from the senate. 9 They met in a different room on a different 10 floor. 11 MR. LOCKHEAD: Okay. We can go 12 ahead and take this down. Thanks, Davin. 13 Q. Okay. So I want to go back just 14 very briefly to when you were presented with 15 the two maps in conference committee, SB -- so 16 the community of interest plan and the 17 Livingston plan. 18 Can you just talk about the way 19 that the performance across the two districts 20 factored into your decision in terms of which 21 plan to support? 22 A. In conference committee? 23 Q. Correct? 24 A. There was no two bills in 25 conference committee. There was only one.</p>

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<p style="text-align: right;">Page 105</p> <p>1 Q. And that was SB-5 that was</p> <p>2 ultimately passed out of conference?</p> <p>3 A. Yes.</p> <p>4 Q. Was there --</p> <p>5 A. We voted to nonconcur and send</p> <p>6 it to conference.</p> <p>7 Q. Once SB-5 was passed out of</p> <p>8 conference and then back to the floor, did you</p> <p>9 speak with anyone about whether to support</p> <p>10 SB-5?</p> <p>11 A. No. We just went back</p> <p>12 downstairs and passed it.</p> <p>13 Q. Did you speak with anyone outside</p> <p>14 the legislature, any members of the</p> <p>15 congressional delegation about whether to pass</p> <p>16 or support SB-5 before you cast your vote?</p> <p>17 A. No.</p> <p>18 Q. Did anyone try to contact you</p> <p>19 about that?</p> <p>20 A. No. It all happened so fast. I</p> <p>21 mean, you have to remember, this was -- from</p> <p>22 the time we passed SB-5 and voted to</p> <p>23 nonconcur and go to conference, it probably</p> <p>24 wasn't an hour before we passed the</p> <p>25 conference committee report and went home.</p>	<p style="text-align: right;">Page 107</p> <p>1 redistricting committee, said of the candidate</p> <p>2 of their choosing. And when pushed added,</p> <p>3 when you add function on top of that, it could</p> <p>4 work." This was in reference to SB-5; is that</p> <p>5 correct?</p> <p>6 A. No. That was in reference to</p> <p>7 my -- my bill.</p> <p>8 Q. Okay. And when you said that --</p> <p>9 when you add function on top of that, what do</p> <p>10 you mean by adding function?</p> <p>11 A. The results that showed that</p> <p>12 democrats could win the second congressional</p> <p>13 district under my plan.</p> <p>14 MR. LOCKHEAD: Okay. We can go</p> <p>15 ahead and take that down. Thanks, Davin.</p> <p>16 Q. Representative Pringle, did you</p> <p>17 attend a recent meeting in Montgomery of the</p> <p>18 Alabama republican party?</p> <p>19 A. No.</p> <p>20 Q. Have you attended one there</p> <p>21 recently at all, Montgomery?</p> <p>22 A. Not since 1990.</p> <p>23 Q. Okay. So you weren't there when</p> <p>24 Representative Barry Moore spoke or Attorney</p> <p>25 General Marshall or Paul Reynolds; is that</p>
<p style="text-align: right;">Page 106</p> <p>1 Q. Great.</p> <p>2 MR. LOCKHEAD: Let's go ahead and</p> <p>3 pull up Exhibit L. I promise we're getting</p> <p>4 close.</p> <p>5 (Whereupon Exhibit L was marked</p> <p>6 for identification.)</p> <p>7 Q. Do you see here a news article</p> <p>8 with the headline, Alabama's Redistricting</p> <p>9 Brawl Rehashes Bitter Fight Over Voting</p> <p>10 Rights? Do you see that?</p> <p>11 A. I see the headline, yes.</p> <p>12 Q. Do you recognize this article?</p> <p>13 A. No.</p> <p>14 Q. Have you read it before?</p> <p>15 A. No.</p> <p>16 MR. LOCKHEAD: Okay. Let's scroll</p> <p>17 down to page 3.</p> <p>18 Q. Okay. I'm going to start reading</p> <p>19 the paragraph here starting with, I believe.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. So "I believe this map is</p> <p>22 an opportunity map and would comply with</p> <p>23 section 2 of the Voting Rights Act, said house</p> <p>24 speaker *Pro Tem, Chris Pringle, the</p> <p>25 republican who cochaired the Alabama</p>	<p style="text-align: right;">Page 108</p> <p>1 right?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. And likewise, you were not</p> <p>4 present at that meeting for the comments of</p> <p>5 David Boucher; is that correct?</p> <p>6 A. At the state executive committee</p> <p>7 meeting?</p> <p>8 Q. That's right.</p> <p>9 A. I was not present at all. I</p> <p>10 have a company to run. I was working.</p> <p>11 MR. LOCKHEAD: Let's go ahead and</p> <p>12 pull up Exhibit O.</p> <p>13 (Whereupon, Exhibit O was marked</p> <p>14 for identification.)</p> <p>15 Q. (By Mr. Lockhead) You see a news</p> <p>16 article on your screen with the headline,</p> <p>17 Representative Terry Sewell, Alabama</p> <p>18 shamelessly ignores U.S. Supreme Court? Do</p> <p>19 you see that headline?</p> <p>20 A. Yes.</p> <p>21 Q. Do you recognize this article?</p> <p>22 A. I believe I've seen it before,</p> <p>23 yes.</p> <p>24 Q. Okay. Are you aware that House</p> <p>25 Speaker Ledbetter said that the map, SB-5</p>

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<p style="text-align: right;">Page 109</p> <p>1 gives a "good shot" in the Supreme Court where 2 "the ruling was 5/4. So there's just one 3 justice that needed to see something 4 different?" Do you recall that quote from 5 this article? 6 A. No, I do not. 7 Q. Okay. Let's go to -- go to it, if 8 we can. Okay. So here at the top of the 9 page, I'll read it again. So -- quote -- do 10 you see the sentencing beginning "if you think 11 about"? 12 A. Yes. 13 Q. Okay. So I'll represent to this 14 is a quote from House Speaker Nathaniel 15 Ledbetter where he says, "If you think about 16 where we were, the Supreme Court ruling was 17 five to four. So there's just one judge that 18 needed to see something different. And I 19 think the movement that we have and what we've 20 come to compromise on today gives us a good 21 shot," House Speaker Nathaniel Ledbetter said. 22 Do you see that quote? 23 A. Yes, I see the quote. 24 Q. Do you agree that the legislature 25 is attempting to get a justice to see</p>	<p style="text-align: right;">Page 111</p> <p>1 be upheld? 2 A. I couldn't answer that. I'm not 3 an attorney. 4 Q. Okay. 5 MR. LOCKHEAD: Let's go ahead and 6 take down the exhibit. I think that's about 7 it from us. Let's briefly go off the record 8 if we can. 9 THE VIDEOGRAPHER: The time is 10 5:19 p.m. We're going off the record. 11 (A short break was taken.) 12 THE VIDEOGRAPHER: The time is 13 5:20 p.m. We are back on the record. 14 MR. LOCKHEAD: Milligan plaintiffs 15 have no further questions at this time. 16 And I'll pass the witness in case 17 counsel for any of the parties wishes to ask 18 any further questions. 19 MS. RUTAHINDURWA: No questions 20 from the Caster plaintiffs. Thank you. 21 MR. WALKER: This is Dorman 22 Walker. No questions. 23 MR. DAVIS: No questions from the 24 Secretary of State. 25 THE VIDEOGRAPHER: Counsel, is it</p>
<p style="text-align: right;">Page 110</p> <p>1 something differently? 2 A. You know, I don't believe -- I'm 3 not. 4 Q. You don't believe so? 5 A. I don't want to speak on behalf 6 of 140 members of the legislature. I know 7 that I'm not. 8 I'm trying to comply with what 9 the Supreme Court ruled. 10 Q. Did Speaker Ledbetter ever express 11 that sentiment to you privately? 12 A. No. 13 Q. What about -- 14 A. But you got to -- you just read 15 a quote from me a minute ago, and they had it 16 attributed to the wrong piece of legislation. 17 So you see how accurate our press is. 18 Q. Are you -- 19 A. I don't know if he ever said 20 that. So I don't know. 21 Q. Are you surprised by it? 22 A. Well, I don't know if he said it 23 or not. I wasn't there. 24 Q. Do you agree that a judge would 25 need to see something differently for SB-5 to</p>	<p style="text-align: right;">Page 112</p> <p>1 going to be the same orders for this witness? 2 MR. LOCKHEAD: Yes, please. 3 THE VIDEOGRAPHER: Just to go off 4 the record with no question, the time is 5 5:21 p.m. on August 9th, 2023. We are going 6 off the record. 7 (The deposition concluded at 5:21 p.m.) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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1 CERTIFICATE
2
3 STATE OF ALABAMA)
4 CALHOUN COUNTY)
5
6 I hereby certify that the above
7 proceedings were taken down by me and
8 transcribed by me using computer-aided
9 transcription, and that the above is a true
10 and correct transcript of the said proceedings
11 given by said witness.
12 I further certify that I am neither
13 of counsel nor of kin to the parties to the
14 action, nor am I in anywise interested in the
15 result of said cause.
16 I further certify that I am duly
17 licensed by the Alabama Board of Court
18 Reporting as a Certified Court Reporter as
19 evidenced by the ACCR number found below.
20
21 COMMISSIONER - NOTARY PUBLIC
22
23 *Cindy C. Jenkins, CCR*
24 CINDY C. JENKINS, CSR
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