

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

In re Redistricting 2023

Misc. No.: 2:23-mc-1181-AMM
Three-Judge Court

**SINGLETON PLAINTIFFS' COMMENTS ON
MORIARTY PROPOSED REMEDIAL PLANS**

The *Singleton* Plaintiffs have reviewed the three plans submitted by Michael Moriarty. Although the *Singleton* Plaintiffs are pleased to see an effort to keep residents of Jefferson County together in the plan called AlabamaCongress#1, they would oppose the adoption of any of the three plans because they have population deviations of several hundred people, which is more than *de minimis*; they split an excessive number of counties (from 16 to 24, depending on the plan); they generally do not keep communities of interest together; and they bear little resemblance to prior plans, even in areas unaffected by racial gerrymanders. Moreover, it is unclear whether the plans contain two opportunity districts. In the plan called AlabamaCongress#3 in particular, it appears doubtful that Black voters would have an opportunity to elect the candidates of their choice in two districts.

Dated: September 14, 2023

Respectfully submitted,

/s/ Henry C. Quillen

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(admitted *pro hac vice*)

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