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U.S. DISTRICT COURT
N.D. OF ALABAMA

EXHIBIT 16

VRA Plaintiffs' Plan

VRA Plaintiffs' Plan

Plan Characteristics	VRA Plaintiffs' Plan
Maximum Population Deviation	1
Contiguous	Yes
Core Retention (% Population in Same District as in 2023 Plan): Statewide	80.9%
County Splits (out of 67 counties)	7
Voting District Splits (out of 1,837 voting districts)	11
Municipality Splits (out of 462 municipalities)	42
Municipality Splits, excluding where at least 95% of population is together	22
Birmingham Split (% Population)	District 6: 13.8% District 7: 86.2%
Mobile (City) Split (% Population)	District 1: 29.2% District 2: 70.8%
Core Black Belt (out of 18 counties)	District 2: 8 counties District 7: 10 counties
Compactness: Reock Score: Statewide	0.32
Compactness: Polsby-Popper Score: Statewide	0.20
Compactness: Population Polygon Score: Statewide	0.65
Compactness: Cut Edges: Statewide	3,957

District Characteristics	District 1	District 2	District 3	District 4	District 5	District 6	District 7
Total Population	717,754	717,754	717,754	717,754	717,754	717,754	717,755
Core Retention (compared to 2023 Plan)	71.3%	64.0%	85.6%	81.0%	95.4%	84.1%	85.0%
Compactness: Reock Score	0.21	0.25	0.41	0.36	0.30	0.27	0.45
Compactness: Polsby-Popper Score	0.14	0.14	0.27	0.19	0.32	0.11	0.21
Compactness: Population Polygon Score	0.73	0.64	0.76	0.38	0.89	0.60	0.56
Black Voting Age Population	14.9%	50.1%	21.6%	7.7%	18.1%	14.1%	54.5%

VRA Plaintiffs' Plan Election Performance Analysis

The percentage below is the margin of victory or defeat of the Black-preferred candidate (equal to the vote count for the Black-preferred candidate minus the vote count for the other top-vote getting candidate, divided by the total number of votes of those two candidates, excluding third-party or "other" votes). The average is a simple average (equally weighted) of all unique election contests without duplicates; in the event of a duplicate, the Legislature's data was used.

Election Contest	**District 1**	**District 2**	**District 3**	**District 4**	**District 5**	**District 6**	**District 7**
Average	-52.4%	**10.3%**	-41.0%	-56.4%	-29.5%	-43.7%	**31.7%**
Count (out of 17 contests)	0	**15**	0	0	0	0	**17**
Data Supplied by the Legislature (Dr. Trey Hood)							
2017 U.S. Senate	-28.4%	**33.0%**	-14.0%	-36.4%	-0.4%	-12.0%	**51.5%**
2018 Attorney General	-44.1%	**18.8%**	-34.0%	-48.7%	-22.1%	-35.6%	**36.6%**
2018 Auditor	-47.7%	**15.7%**	-37.0%	-53.7%	-24.2%	-39.4%	**34.0%**
2018 Governor	-46.5%	**13.1%**	-36.0%	-49.6%	-23.0%	-33.4%	**35.7%**
2018 Lt. Governor	-49.4%	**13.7%**	-38.2%	-55.8%	-26.6%	-41.1%	**33.7%**
2018 Secretary of State	-48.9%	**14.0%**	-37.7%	-55.3%	-25.3%	-40.4%	**33.2%**
2020 President	-51.6%	**12.8%**	-41.1%	-62.4%	-27.5%	-40.2%	**32.0%**
2020 U.S. Senate	-44.3%	**17.1%**	-36.3%	-55.9%	-21.0%	-34.8%	**35.1%**
2022 Attorney General	-61.1%	**0.6%**	-52.3%	-71.3%	-37.6%	-48.9%	**24.7%**
2022 Governor	-64.4%	-2.7%	-55.1%	-74.3%	-43.5%	-53.8%	**23.3%**
2022 Secretary of State	-61.6%	**1.8%**	-52.6%	-71.7%	-38.0%	-49.7%	**25.8%**
2022 U.S. Senate	-62.7%	-0.4%	-52.9%	-71.6%	-39.0%	-49.7%	**24.6%**
Data Supplied by the Milligan Plaintiffs (Dr. Baodong Liu)							
2014 Auditor	-55.9%	**5.6%**	-38.0%	-42.7%	-35.4%	-57.5%	**29.2%**
2014 Lt. Governor	-57.4%	**6.4%**	-40.6%	-38.4%	-38.1%	-57.2%	**29.5%**
2014 Secretary of State	-57.8%	**7.4%**	-42.9%	-46.3%	-39.5%	-61.1%	**29.4%**
2018 Auditor	-47.7%	**15.9%**	-36.7%	-53.7%	-24.2%	-39.2%	**34.1%**
2018 Lt. Governor	-49.4%	**13.9%**	-37.9%	-55.8%	-26.6%	-40.9%	**33.8%**
2018 Pub. Serv. Comm'n	-48.3%	**16.0%**	-36.4%	-53.9%	-24.3%	-39.7%	**35.1%**
2020 President	-50.0%	**10.8%**	-37.5%	-60.6%	-27.9%	-39.4%	**31.8%**
2022 Supreme Court	-60.2%	**2.2%**	-51.0%	-69.9%	-36.5%	-48.9%	**25.7%**
2022 Attorney General	-61.2%	**0.8%**	-52.1%	-71.3%	-37.6%	-48.9%	**24.7%**
2022 Governor	-64.5%	-2.6%	-54.9%	-74.3%	-43.5%	-53.8%	**23.3%**
2022 Secretary of State	-61.7%	**1.9%**	-52.4%	-71.7%	-38.0%	-49.7%	**25.9%**
2022 U.S. Senate	-62.8%	-0.4%	-52.7%	-71.6%	-39.0%	-49.7%	**24.7%**

Lauderdale
Limestone
5
Jackson
Colbert
Madison
Lawrence
Morgan
Franklin
Marshall
DeKalb
4
Cullman
Cherokee
Marion
Winston
Etowah
Blount
Lamar
Fayette
Walker
St. Clair
Calhoun
Cleburne
3
Jefferson
Talladega
Pickens
Tuscaloosa
Shelby
Clay
Randolph
6
Greene
Bibb
Coosa
Tallapoosa
Chambers
Hale
Chilton
Perry
Elmore
Lee
Sumter
Autauga
Dallas
Macon
Russell
Marengo
Montgomery
7
Lowndes
Bullock
Choctaw
Wilcox
Barbour
Pike
Butler
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Clarke
Monroe
Henry
Washington
Coffee
Dale
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Blount
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Fayette
Walker
St. Clair
Calhoun
Cleburne
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Jefferson
Talladega
Pickens
Tuscaloosa
Shelby
Clay
Randolph
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