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

EXHIBIT 13

Moriarty Plan 2

Moriarty Plan 2

Plan Characteristics	Moriarty Plan 2
Maximum Population Deviation	1,127
Contiguous	Yes
Core Retention (% Population in Same District as in 2023 Plan): Statewide	52.8% ^
County Splits (out of 67 counties)	24
Voting District Splits (out of 1,837 voting districts)	0
Municipality Splits (out of 462 municipalities)	37
Municipality Splits, excluding where at least 95% of population is together	18
Birmingham Split (% Population)	District 4: 0.3% District 6: 0.0%* District 7: 99.7%
Mobile (City) Split (% Population)	District 1: 100%
Core Black Belt (out of 18 counties)	District 1: 4 counties** District 2: 2½ counties District 3: 11½ counties
Compactness: Reock Score: Statewide	0.34
Compactness: Polsby-Popper Score: Statewide	0.15
Compactness: Population Polygon Score: Statewide	0.71
Compactness: Cut Edges: Statewide	3,917

** The city of Birmingham is split among three districts. 16 people (which rounds to 0.0% of the city population) are in District 6.*
*** Butler, Crenshaw, Pike, Barbour, and Russell Counties are split between Districts 2 and 3. These splits are counted as "½" in each case.*
^ For the core retention analysis, the proposed labels for Districts 4 and 6 were swapped. Otherwise the statewide core retention would have been 38.3%.

District Characteristics	District 1	District 2	District 3	District 4	District 5	District 6	District 7
Total Population	717,165	718,292	717,878	718,073	717,487	718,051	717,333
Core Retention (compared to 2023 Plan) ^	57.8%	49.0%	22.8%	70.0%	83.3%	36.7%	50.2%
Compactness: Reock Score	0.16	0.20	0.36	0.57	0.27	0.40	0.44
Compactness: Polsby-Popper Score	0.15	0.09	0.09	0.15	0.29	0.19	0.12
Compactness: Population Polygon Score	0.86	0.77	0.71	0.49	0.96	0.35	0.83
Black Voting Age Population	34.0%	18.8%	47.3%	16.5%	20.3%	3.2%	41.0%

Moriarty Plan 2 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	-11.5%	-48.9%	**9.5%**	-49.9%	-24.4%	-68.1%	**10.7%**
Count (out of 17 contests)	1	0	**14**	0	1	0	**15**
Data Supplied by the Legislature (Dr. Trey Hood)							
2017 U.S. Senate	**15.2%**	-25.6%	**33.2%**	-25.1%	**5.3%**	-52.9%	**40.0%**
2018 Attorney General	-2.7%	-40.7%	**16.2%**	-43.2%	-16.4%	-61.9%	**17.7%**
2018 Auditor	-6.2%	-44.4%	**13.6%**	-46.8%	-18.6%	-66.6%	**14.9%**
2018 Governor	-2.4%	-44.5%	**10.6%**	-43.5%	-17.8%	-62.8%	**19.0%**
2018 Lt. Governor	-7.3%	-45.9%	**11.6%**	-48.2%	-21.1%	-68.5%	**13.7%**
2018 Secretary of State	-7.8%	-45.4%	**12.0%**	-48.0%	-19.7%	-67.9%	**14.3%**
2020 President	-12.2%	-48.3%	**11.8%**	-50.9%	-22.0%	-73.6%	**14.6%**
2020 U.S. Senate	-6.5%	-41.6%	**15.3%**	-46.0%	-15.5%	-67.2%	**18.6%**
2022 Attorney General	-21.9%	-59.3%	-0.5%	-58.5%	-33.2%	-80.7%	**3.8%**
2022 Governor	-24.3%	-62.6%	-3.6%	-61.1%	-39.2%	-83.4%	**0.6%**
2022 Secretary of State	-21.0%	-60.0%	**0.5%**	-59.0%	-33.4%	-81.3%	**4.5%**
2022 U.S. Senate	-23.1%	-60.8%	-1.0%	-58.7%	-34.5%	-81.1%	**3.5%**
Data Supplied by the Milligan Plaintiffs (Dr. Baodong Liu)							
2014 Auditor	-13.2%	-48.7%	**5.2%**	-48.7%	-29.8%	-54.8%	-3.2%
2014 Lt. Governor	-17.3%	-50.0%	**10.7%**	-51.3%	-33.2%	-49.8%	**0.3%**
2014 Secretary of State	-17.8%	-50.2%	**11.5%**	-54.4%	-34.6%	-59.0%	-1.4%
2018 Auditor	-6.2%	-44.4%	**13.8%**	-46.6%	-18.6%	-66.6%	**14.8%**
2018 Lt. Governor	-7.3%	-45.9%	**11.9%**	-47.9%	-21.0%	-68.5%	**13.7%**
2018 Pub. Serv. Comm'n	-6.1%	-44.7%	**13.9%**	-46.6%	-18.6%	-67.1%	**15.3%**
2020 President	-10.0%	-47.5%	**8.5%**	-49.7%	-21.9%	-73.6%	**14.3%**
2022 Supreme Court	-20.7%	-58.4%	**1.2%**	-58.6%	-32.0%	-79.6%	**5.6%**
2022 Attorney General	-21.9%	-59.3%	-0.2%	-59.6%	-33.2%	-80.7%	**5.5%**
2022 Governor	-24.3%	-62.7%	-3.2%	-62.3%	-39.2%	-83.4%	**2.3%**
2022 Secretary of State	-21.0%	-60.1%	**0.8%**	-60.1%	-33.4%	-81.3%	**6.2%**
2022 U.S. Senate	-23.1%	-60.8%	-0.7%	-59.9%	-34.5%	-81.1%	**5.2%**

Lauderdale
Limestone
Madison
Jackson
Colbert
5
Lawrence
Morgan
Franklin
Marshall
DeKalb
6
Cherokee
Marion
Winston
Cullman
Etowah
Blount
Lamar
Fayette
Walker
St. Clair
Calhoun
Cleburne
Jefferson
7
4
Pickens
Tuscaloosa
Shelby
Clay
Randolph
1
Greene
Bibb
Coosa
Tallapoosa
Chambers
Hale
Chilton
Perry
Elmore
Lee
3
Sumter
Autauga
Dallas
Macon
Russell
Marengo
Montgomery
Lowndes
Bullock
Choctaw
Wilcox
Barbour
Pike
Butler
Crenshaw
Clarke
Monroe
Henry
Coffee
Dale
Washington
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Etowah
Blount
Lamar
Fayette
Walker
St. Clair
Calhoun
Cleburne
Jefferson
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Tuscaloosa
Shelby
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