

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

BOBBY SINGLETON, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No.: 2:21-cv-1291-AMM
)	
WES ALLEN, in his official)	THREE-JUDGE COURT
capacity as Alabama Secretary of)	
State, et al.,)	
)	
<i>Defendants.</i>)	

EVAN MILLIGAN, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No.: 2:21-cv-01530-AMM
)	
WES ALLEN, in his official)	THREE-JUDGE COURT
capacity as Secretary of State of)	
Alabama, et al.,)	
)	
<i>Defendants.</i>)	

MARCUS CASTER, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No.: 2:21-cv-01536-AMM
)	
WES ALLEN, in his official)	
Capacity as Alabama Secretary of)	
State, et al.,)	
)	
<i>Defendants.</i>)	

STATE DEFENDANTS' FOURTH SUPPLEMENT TO THEIR INITIAL DISCLOSURES

Hon. Wes Allen, sued in his official capacity as Alabama Secretary of State, and Sen. Steve Livingston and Rep. Chris Pringle, sued in their official capacities as Chairs of the Alabama Permanent Legislative Committee on Reapportionment, supplement their initial disclosures pursuant to Fed. R. Civ. P. 29(a)(1)(A) as follows:

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Karen Landers, MD, FAAP
Chief Medical Officer
Alabama Department of Public Health

Please contact through:

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Amended subject matter of information: Dr. Landers has information about ADPH's response to COVID-19, particularly with respect to vaccine distribution, as well as about activities ADPH facilitates, or participates in, to improve access to health care services for rural Alabamians with special concern for children, the elderly, minorities, and other medically underserved vulnerable populations.

The State Defendants reserve the right to call and cross-examine any witnesses listed by any other party. The State Defendants incorporate by reference

each of the individuals or entities identified in Plaintiffs' initial disclosures and any supplements or amendments thereto as those individuals and entities may have discoverable information.

The State Defendants reserve the right to call any witness who is deposed in this case irrespective of whether that witness was formally disclosed by any party.

This identification of individuals does not include those who may be used solely for impeachment purposes.

(ii) A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

The State Defendants are today producing 19 documents *via* Microsoft OneDrive. The files are password protected, and the password is 30sWis-oduwl The Bates range is SOS154705 through SOS155036.

Included in these documents are five Excel files which were produced on April 10, 2024, but for which the native files were produced as PDFs instead of as Excel spreadsheets. These documents are found at Bates range SOS154705 through SOS154709. The following chart cross-references today's production to the prior one for these five Excel spreadsheets.

April 10, 2024 Bates No.	May 6, 2024 Bates No.	ObjectName
SOS153407	SOS154705	PercentOfPeopleInitiatingC19VaxByRaceChartExport.xlsx
SOS153409	SOS154706	2014 TRANSACTIONS - DL CLOSURE.xls
SOS153519	SOS154707	Democratic_Party- Official_2024_Primary_Election_Results.xlsx
SOS153526	SOS154708	RepublicanPartyOfficial-2024PrimaryResults.xlsx
SOS154627	SOS154709	Pike Road_Enrollment_2018_2024.xlsx

Please note that most of the documents produced today are in response to the *Stone* expert report of Joseph Bagley, Ph.D., who has also been a witness in *Milligan*. Documents produced in *Milligan* are, by agreement of the parties, also produced in *Stone*. Producing the documents in all four cases makes them available at the earliest opportunity to all Plaintiffs' counsel in the event the documents are, or become, relevant in these Congressional cases.

The State Defendants reserve the right to use any and all of the following: documents produced by any party in discovery, including initial disclosures (whether original, supplemented, or amended), expert reliance materials, and documents made exhibits to depositions; documents filed in this litigation; and, documents produced to both parties as a result of any subpoena issued in this case.

* * *

These disclosures are based upon information reasonably available at this time. Supplemental information will be provided as required by Fed. R. Civ. P. 26(e).

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that on May 6, 2024, I served the foregoing by electronic mail to all counsel of record for the Plaintiffs.

/s/ Misty S. Fairbanks Messick
Counsel for Secretary Allen