

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' SEVENTH 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.

Brad Kimbro
Chief Executive Officer
Wiregrass Electric Cooperative
509 North State Highway 167
Hartford, Alabama 36344
[REDACTED]

Subject of information: Mr. Kimbro has lived in Alabama more than 50 years, and the great majority of that time has been in the Wiregrass. He is Chief Executive Officer of Wiregrass Electric Cooperative, which primarily serves Houston County, Geneva County, Coffee County, Dale County, and Covington County. Through his personal, professional, and community service experiences, he has information about the Wiregrass and, in particular, the counties served by the Cooperative. For further information, please see his declaration and deposition testimony in this case.

Lee Lawson
President and Chief Executive Officer
Baldwin County Economic Development Alliance
1100 Fairhope Avenue
Fairhope, Alabama 36532
[REDACTED]

Subject of information: Mr. Lawson is an Alabama native who has lived in Baldwin County for about a dozen years. He has worked at the Baldwin County Economic Development Alliance, which fosters business development in the County, for about 15 years and currently serves as President and Chief Executive Officer. Mr. Lawson has information about his experiences living and working in in the Gulf Coast and about relevant communities of interest. For further information, please see his declaration and deposition testimony in this case.

Cathy McNeal, Ed.D.
Chief Strategy & Innovation Officer
Huntsville City Schools

Please contact through:

Chris Pape
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Subject of information: Dr. McNeal has information about the Huntsville City Schools progress with respect to the desegregation litigation. She was recently deposed in *Stone v. Allen*, Case No. 2:21-cv-01531-AMM (N.D. Ala. pending).

Mike Schmitz
Mike Schmitz Automotive Group
2309 Ross Clark Circle
Dothan, Alabama 36301
[REDACTED]

Subject of information: Mr. Schmitz moved to Alabama in the 1980s and has been in the automobile business in Alabama for about 35 years. From 2009 until 2017, he was the Mayor of Dothan. Thereafter, he was chairman of the board with the public schools for four years. Around 2021, he was appointed as a Civilian Aide to the Secretary of the Army representing Alabama South. He has been involved in

economic development efforts in the area and is a community servant. Mr. Schmitz attended a July 2023 meeting of the Permanent Legislative Committee on Reapportionment for the State of Alabama so that he could share his views on the importance of keeping certain areas of the State together. Mr. Schmitz has information about his experiences living and working in Alabama and about relevant communities of interest. For further information, please see his declaration and deposition testimony in this case.

Derrick Turner
Mobile Career Center Director
Alabama Department of Labor

Please contact through:

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Alabama Department of Labor
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Subject of information: Mr. Turner has information about the work of the Alabama Department of Labor's Mobile Career Center.

Jeff Williams


Subject of information: After living in multiple other places including during his service with the U.S. Army and U.S. Army Reserves, Mr. Williams moved to Dothan sixteen years ago to accept a position with BBVA Bank. He is currently the Regional President for South Alabama for SmartBank. As a commercial banker dealing with large business and government entities, he understands his client's businesses, including the environment in which they operate, namely the Wiregrass. His knowledge of the Wiregrass is further enhanced by his community service. Mr. Williams has information about his experiences living and working in Alabama and about relevant communities of interest. For further information, please see his declaration and deposition testimony in this case.

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.

This identification of individuals also does not include experts, who have been separately disclosed.

(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 documents *via* Microsoft OneDrive. The files are password protected, and the password is 5@@SpI3ic=SW. The Bates range is SOS157096 through SOS161595.

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,

Steve Marshall
Attorney General

/s/ Misty S. Fairbanks Messick
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***Counsel for Senator Livingston and
Representative Pringle***

CERTIFICATE OF SERVICE

I certify that on August 7, 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