

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

BOBBY SINGLETON, et al.,)
)
Plaintiffs,)
)
v.)
)
WES ALLEN, in his official)
capacity as Alabama Secretary of)
State, et al.,)
)
Defendants.)

Case No.: 2:21-cv-1291-AMM

THREE-JUDGE COURT

EVAN MILLIGAN, et al.,)
)
Plaintiffs,)
)
v.)
)
WES ALLEN, in his official)
capacity as Secretary of State of)
Alabama, et al.,)
)
Defendants.)

Case No.: 2:21-cv-01530-AMM

THREE-JUDGE COURT

MARCUS CASTER, et al.,)
)
Plaintiffs,)
)
v.)
)
WES ALLEN, in his official)
Capacity as Alabama Secretary of)
State, et al.,)
)
Defendants.)

Case No.: 2:21-cv-01536-AMM

STATE DEFENDANTS' SIXTH 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.

Kenneth W. Boswell
Director
Alabama Department of Economic & Community Affairs

Please contact through:

Meg Williams Fiedler
General Counsel
Alabama Department of Economic & Community Affairs
401 Adams Avenue
Montgomery, Alabama 36104
(334) 242-5255
Meg.Fiedler@ADECA.Alabama.gov

Subject of Information: ADECA programs significantly impact Alabama communities and their residents for the better. Director Boswell has information about ADECA's work, which includes expanding broadband access and administering dozens of grant programs focused on creating jobs, strengthening the State's economy, and improving the lives and welfare of the State's residents.

Gerald Nix
Senior Statistician
Workforce Development
Labor Market Information Division
Alabama Department of Labor

Please contact through:

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Subject of Information: Mr. Nix has information about publications on the Workforce Development portion of the Alabama Department of Labor's website and his work for the Alabama Department of Labor.

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 documents *via* Microsoft OneDrive. The files are password protected, and the password is GL8!Inu17rEM. The Bates range is SOS155436 through SOS157095.

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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Attorney General

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***Counsel for Senator Livingston and
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CERTIFICATE OF SERVICE

I certify that on July 2, 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