

IN THE UNITED STATES DISTRICT COURT
FOR THE 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.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 2:21-cv-01536-AMM
)	
WES ALLEN, in his official)	
Capacity as Alabama Secretary of)	
State, et al.,)	
)	
Defendants.)	

STATE DEFENDANTS' AMENDED JOINT EXHIBIT LIST & FILING OF EXHIBITS

The State Defendants submit the following amended list of exhibits they intend to offer at trial or that they may offer at trial.

Videos and Excel files not suitable for filing as PDFs will be supplied the Clerk's office and the Chambers of the Judges on electronic media, *e.g.*, USB drives.

The State Defendants reserve the right to offer exhibits listed on any other party's exhibit list and to use other documents for rebuttal or impeachment.

1. Expert Report of Dr. Christopher W. Bonneau (June 28, 2024)
2. Response Report of Dr. Christopher W. Bonneau (Aug. 15, 2024)
3. Expert Report of Adam M. Carrington, Ph.D. (June 27, 2024)
4. Updated CV of Adam M. Carrington, Ph.D. (Carrington Dep. PX2)
5. Expert Report of M.V. Hood III (Dec. 10, 2021)
6. Supplemental Expert Report of M.V. Hood III (Dec. 20, 2021)
7. Expert Report of M.V. Hood III (June 28, 2024)
8. Expert Report of Dr. Wilfred Reilly (June 28, 2024)
9. Expert Report of Sean P. Trende (Aug. 4, 2023)
10. Expert Report of Sean P. Trende, Ph.D. (June 28, 2024)
11. Expert Report of Kosuke Imai, Ph.D. (Dec. 10, 2021)
12. Rebuttal Expert Report of Kosuke Imai, Ph.D. (Dec. 20, 2021)

13. Map depicting Wiregrass, Black Belt Alabama Counties, and Gulf Coast Region (Trende Dep. Ex. 7)

14. Joseph Bagley, *The Politics of White Rights: Race, Justice, and Integrating Alabama's Schools* (2018) (excerpt: map of Alabama)

15. FBI Crime Data Explorer Arrest Data

16. ADOC Monthly Statistical Report

17. FBI Crime Data Explorer Offender Data

18. Communities of Interest (Cooper Dep. DX5)

19. Cooper Plan 6 with Incumbent Address (Cooper Dep. Ex. 6)

20. Cooper Plans 6 and 7 with Mobile City Limits (Cooper Dep. Ex. 7)

21. "A New History of the American South," Chapter 12 (Frederickson Dep. Ex. 6)

22. "Republican demands Congress vote on Pentagon abortion policy: 'We are not a communist country,'" The Guardian (Frederickson Dep. Ex. 7)

23. "Cold War Dixie," Chapter 7 (Frederickson Dep. Ex. 8)

24. "Corporate Culture, the Cold War, and the American South in the 1950s and 1960s," (Frederickson Dep. Ex. 9)

25. "Creating a 'Respectable Area'" (Frederickson Dep. Ex. 10)

26. Expert Declaration of Maxwell Palmer, Ph.D. in *Texas Alliance for Retired Americans v. Ruth Hughes* (Aug. 4, 2020) (Palmer DX8)

27. Declaration of Chief Medical Officer Dr. Mary McIntyre (Landers Dep. DX1)
28. Video – Know the Symptoms (Landers Dep. DX2) *(filed conventionally)*
29. Video – Symptoms? Get Tested (Landers Dep. DX3) *(filed conventionally)*
30. Video – Protect Yourself and Others (Landers Dep. DX4) *(filed conventionally)*
31. Video – You Are Safer at Home (Landers Dep. DX5) *(filed conventionally)*
32. Don't Hesitate. Vaccinate. (Landers Dep. DX6)
33. Brochure for Joint Community Health Fair (Landers Dep. DX7)
34. Morbidity and Mortality Weekly report – *County-Level COVID-19 Vaccination Coverage and Social Vulnerability – United States, December 14, 2020-March 1, 2021* (SOS153401)
35. *Alabama doctors urging Black women to participate in landmark study on cancer amid low survival rates* (May 23, 2024) (Landers Dep. PX8)
36. Excel File – Percent of People Initiating C19Vax by Race Chart Export (SOS154705) *(filed conventionally)*

37. *After decades of wastewater struggles, a ray of hope in Alabama's Black Belt*, al.com (June 7, 2024) (SOS155466)

38. 2023 Alabama Tourism Economic Report (Lawson Dep. Ex. 3)

39. State of the Workforce Report XVII (Nix Dep. Ex. 3)

40. Empower Your True Potential (Turner Dep. Ex. 3)

41. Annotated Map of Alabama counties (Williams Dep. DX 1)

42. NBC Video footage of Carroll speaking on annexation (Carroll Dep. Ex. 02) (*filed conventionally*)

43. Screenshot of X/Twitter post (Chestnut Dep. Ex. 07)

44. Screenshot of X/Twitter post (Chestnut Dep. Ex. 08)

45. Screenshot of Clopton's LinkedIn Profile (Clopton Dep. Ex. 03)

46. Article on Malone Winning the 2024 AARP Purpose Prize (Malone Dep. Ex. 03)

47. Biography of Councilman C.J. Small (Small Dep. Ex. 1)

48. City of Mobile Council District Maps (Pending 2025 Election) (Small Dep. Ex. 6)

49. City of Mobile Council District Maps (Current) (Small Dep. Ex. 7)

50. Map of Mobile Council Districts from Dave's Redistricting (Small Dep. Ex. 9)

51. State Defendants' Second Supplement to Their Initial Disclosures

52. State Defendants' Fourth Supplement to Their Initial Disclosures

53. State Defendants' Sixth Supplement to Their Initial Disclosures

54. State Defendant's Seventh Supplement to Their Initial Disclosures

55. *Milligan* Plaintiffs' First Supplement to Their Disclosures

56. *Singleton* Plaintiffs' Responses to Defendant Secretary of State Wes Allen's Discovery Requests (Mar. 31, 2023)

57. *Milligan* Plaintiffs' Responses to Defendant Secretary of State Wes Allen's Interrogatories, Requests for Production, and Requests for Admission (Apr. 17, 2023), including subsequent verifications by Milligan and Stone which have been inserted at the end of the document

58. Ala. Act No. 2023-563 (filed in *Milligan* Aug. 18, 2023)

59. *Withdrawn*

60. *Withdrawn*

61. Public Hearing Transcript – Joint Legislative Committee on Reapportionment (Mobile, AL) (June 14, 1991) (SOS008654)

62. Public Hearing Transcript – Joint Legislative Committee on Reapportionment (Montgomery, AL) (Aug. 21, 1991) (SOS007291)

63. Public Hearing Transcript – Joint Legislative Committee on Reapportionment (Montgomery, AL) (Oct. 2, 1991) (SOS007200)

64. Letter from Alabama Attorney General Jimmy Evans to Voting Section Chief John Tanner re: March 1992 Objection & *Wesch* (Apr. 15, 1992) (SOS007081)

65. Letter to Alabama Attorney General Bill Pryor from USDOJ Assistant Attorney General Ralph F. Boyd, Jr., granting preclearance to Ala. Act No. 2002-57 concerning Congressional redistricting (March 4, 2002) (SOS002736)

66. Letter from U.S. Rep. Glen Browder to Members of the Joint Legislation Committee on Reapportionment expressing confidence that the Committee will redistrict “with full attention to our citizens’ right to reasonable access to their Member of Congress and with minimal disruption of traditional community boundaries.” (SOS007596)

67. Brief of the State of Alabama as Amicus Curiae in Support of Appellant Shelby County, *Shelby County v. Holder*, Case No. 11-5256 (U.S. 2011) (SOS001191)

68. Alabama’s Congressional Maps from 1822 through 2021, (filed as Exhibit 7 to *Singleton* Plaintiffs’ Renewed Motion for a Preliminary Injunction and Memorandum of Law in Support, Dec. 15, 2021)

69. Ideal Population – State Board of Education Districts and Congressional Districts (SOS002457)

70. The State Prison System map (March 1, 2011) (SOS002548)

71. 2011 Plan – Complaint, *Alabama v. Holder*, Case No. 1:11-cv-01628-TFH (DDC) (SOS000005)

72. 2011 Plan – Errata to Complaint, *Alabama v. Holder*, Case No. 1:11-cv-01628-TFH (DDC) (SOS000172)

73. 2011 Plan – Notice of Dismissal, *Alabama v. Holder*, Case No. 1:11-cv-01628-TFH (DDC) (SOS000213)

74. Letter to Mr. John J. Park, Jr. from USDOJ Assistant Attorney General Thomas E. Perez granting preclearance to Ala. Act No. 2011-518 and Ala. Act No. 2011-677, which concern Congressional redistricting and redistricting the Alabama State Board of Education, respectively (Nov. 21, 2011) (SOS000359)

75. USDOJ Press Release: Assistant Attorney General Thomas E. Perez Speaks at the National Association of Latino Elected Officials Luncheon on Redistricting (Feb. 8, 2011) (SOS000830)

76. 2011 Congressional Map

77. 2020 Annual Report - State Personnel Board

78. 2020 Democratic Runoff

79. 2020-03 Certification AL Democratic Party Primary Runoff Candidates (Mar. 11, 2020)

80. Governor's Proclamation, 2021 Second Special Session (Oct. 25, 2021)

81. 2021 Public Hearing Schedule (McClendon Dep. Ex. 04)

82. Map of Alabama Counties (Jones Dep. DX3)
83. 2021 Congressional District Map (Thomas DX3)
84. Maps - Alabama 2021 Congressional Plan by CD with basic stats for each (Milligan-RC 049617-623)
85. VRA Plaintiffs Remedial Map (Smith Dep. Ex. 05)
86. 2023 Congressional District Map (Thomas DX4)
87. Alabama (Legislative) 2023 Congressional Plan district statistics by district (Milligan-RC 049678-684)
88. Map - Alabama (Legislative) 2023 Congressional Plan Milligan-(RC 049699)
89. Alabama (Legislative) 2023 Congressional Plan measures of compactness report (Milligan-RC 049700-702)
90. Alabama (Legislative) 2023 Congressional Plan minority population stats by district (Milligan-RC 049704-705)
91. Alabama (Legislative) 2023 Congressional Plan political subdivision splits between districts (Milligan-RC 049771)
92. 2021 Congressional District Map and VRA Plaintiffs' Remedial Map (Love DX3)
93. Singleton Plan (Singleton Dep. Ex. 01)
94. Livingston Congressional Plan 3-2023 map (Simelton Dep. Ex. 05)

95. Annotated Map of Alabama (Cooper DX3)
96. Livingston Congressional Plan 3 with Population Summary (Williams Dep. Ex. 02)
97. Packet of Maps (L. Jackson Dep. Ex. 05)
98. 2021 Alabama Congressional Plan states, compactness scores, map, and performance analyses in state-wide elections (Jones Dep. DX4)
99. 2023 Alabama Congressional Plan states, compactness scores, map, and performance analyses in state-wide elections (Jones Dep. DX5)
100. Map – 2010 McClendon Congressional Plan 1 (Jones Dep. DX8)
101. 2021 Congressional Map (with county and city names) (Hinaman Dep. PX5)
102. 2011 Congressional Map (with county and city names) (Hinaman Dep. PX6)
103. 2021 Districts 1 – 7 split up with stats (Hinaman Dep. PX8)
104. Chart of 2021 Congressional Plans (Hinaman Dep. PX9)
105. Statewide election results by CD (Milligan-RC 049825-833)
106. Singleton 3 performance data based on prior election returns (Milligan-RC 049841-853)
107. Maps – Court-Ordered Congressional Plan, with Mobile zoom (Milligan-RC 054055-056)

108. Special Master Remedial Plan 3, population stats by CD (Milligan-RC 054057-069)

109. 2023 Court-Ordered Congressional Districts, population stats by CD (Milligan-RC 054070-082)

110. 2023 Court-Ordered Congressional Districts political subdivision splits between districts (Milligan-RC 054156-157)

111. Court-Ordered Congressional Map 2023 district stats (Milligan-RC 054175-180)

112. 2001 Alabama Congressional District Map (SOS000582)

113. Official 1991-92 Alabama Highway Map, United States Congressional Districts Map (SOS008999)

114. Map – Alabama U.S. House 2011 Plan showing interstates (Milligan-RC 0056074)

115. Statistics – State Board of Education Districts and Congressional Districts (SOS002398)

116. 2021 Redistricting Plans – Comparative by District Analysis – Congressional

117. 2021 Plan - 1 – Map

118. 2021 Plan - 2 - District Statistics

119. 2021 Plan - 3 - Population Summary - Single Race

120. 2021 Plan - 4 - VAP Summary - Single Race
 121. 2021 Plan - 5 - Population Summary - Any Part Race
 122. 2021 Plan - 6 - VAP Summary - Any Part Race
 123. 2021 Plan - 7 - Plan Components' Population and VAP
 124. Application of Appellant Billy Joe Camp, Secretary of State of Alabama, for Stay of Judgment Pending Appeal
 125. Excel File – Democratic Party-Official 2020 Primary Election Results
- (1) ***(filed conventionally)***
126. *Jones v. Jefferson County* - Motion for Consent Order (agreed before litigation)
 127. Alabama Democratic Party Certification of Candidates for the March 3, 2020 Democratic Primary Election (Dec. 18, 2019), available at <https://www.sos.alabama.gov/sites/default/files/AL%20DEM%20Cert%20Amend%2012182019.pdf>
 128. Kiani Gardner - CD-1 candidate endorsed by ADC
 129. Liu -- Alabama Democrats candidate list 2020 primaries
 130. Appellee Paul Charles Wesch's Motion to Dismiss or Affirm, *Camp v. Wesch*, Case No. 91-1553 (U.S.)
 131. Jurisdictional Statement, *Camp v. Wesch*, Case No. 91-1553 (U.S.)

132. Appendix to the Jurisdictional Statement, *Camp v. Wesch*, Case No. 91-1553 (U.S.) (*filed in four parts*)
133. Sam Pierce Map (Zero) and statistics (1991) (SOS007159)
134. Singleton 1 Plan - 1 - Map
135. Singleton 1 Plan - 3 - District Statistics
136. Singleton 1 Plan - 4 - Population Summary - Single Race
137. Singleton 1 Plan - 5 - VAP Summary - Single Race
138. Singleton 1 Plan - 6 - Population Summary - Any Part Race
139. Singleton 1 Plan - 7 - VAP Summary - Any Part Race
140. Singleton 1 Plan - 8 - Plan Components' Population and VAP
141. Singleton 3 Plan - 1 - Map
142. Singleton 3 Plan - 3 - District Statistics
143. Singleton 3 Plan - 4 - VAP Summary - Single Race
144. Singleton 3 Plan - 5 - Population Summary - Single Race
145. Singleton 3 Plan - 6 - Population and VAP Summary - Any Part Race
146. *Withdrawn*
147. State of Alabama Reapportionment Committee Guidelines for Congressional, Legislative, and State Board of Education Redistricting (May 2011) (SOS002410; SOS002418)

148. Reapportionment Committee Guidelines for Legislative and Congressional Redistricting, State of Alabama (1990 cycle) and 1992 Alabama Redistricting Plan with statistics (SOS007395)

149. *Withdrawn*

150. *Withdrawn*

151. US election 2020 Why Trump gained support among minorities

152. Letter to Alabama Attorney General Troy King from USDOJ Acting Assistant Attorney General Grace Chung Becker withdrawing objection pursuant to Section 5 following *Riley v. Kennedy*, 553 U.S. 406 (2008). (July 23, 2008)

153. Supplemental Stipulation, *Wesch v. Hunt*, Case No. 91-0787-BH (S.D. Ala. 1992)

154. 2010 Census questionnaire (SOS000625)

155. Alabama Voter Registration as of June 30, 2011 by County, Status, and Race (SOS000809)

156. Alabama's Legislative Process by Patrick Harris, Secretary of the Senate, and McDowell Lee, Former Secretary of the Senate, revised 2011 (SOS000816)

157. 2000 Population State Board of Education

158. Preclearance Submission, Board of Education, Ala. Act No. 2002-73 (Feb. 7, 2002)

159. US Congress Final District Statistics Report (SOS001080)
160. 2021 Census - Alabama Profile
161. Hispanic Voters Now Evenly Split Between Parties, WSJ Poll Finds
Sentencing Project, The Color of Justice Racial and Ethnic Disparity in Prison
162. *Withdrawn*
163. Alabama Senate Profile - Robert Kennedy Jr. says he's more than a
name (Aug. 9, 2017)
164. Economic Policy Institute, State unemployment by race and ethnicity
(2021Q3)
165. Democratic_Party-Official 2020 Primary Election Results (only CD1
and CD2 results; others hidden)
166. Census 2018 Voting and Reg by Race
167. Census 2016 Voting and Reg by Race
168. U.S. Commission on Civil Rights, *Becoming Less Separate? School
Desegregation, Justice Department Enforcement, and the Pursuit of Unitary Status*
169. ACS 2019 Data Connecticut
170. ACS 2019 Data United States
171. Counties with 2021 Districts (Bates No. 000008-11)
172. *Withdrawn*
173. *Withdrawn*

- 174. *Withdrawn*
- 175. *Withdrawn*
- 176. *Withdrawn*
- 177. *Withdrawn*
- 178. *Withdrawn*
- 179. *Withdrawn*
- 180. *Withdrawn*
- 181. Homewood Fix
- 182. Hatcher Plan - 1 - Map
- 183. Hatcher Plan - 2 - District Statistics
- 184. Hatcher Plan - 3- Population Summary - Single Race
- 185. Hatcher Plan - 4 - VAP Summary - Single Race
- 186. Hatcher Plan - 5- VAP Summary - Any Part Race
- 187. Hatcher Plan - 6 - Population Summary - Any Part Race
- 188. Hatcher Plan - 7 - Plan Components' Population and VAP
- 189. Hatcher Plan - 8 - County and Voting District Splits
- 190. Hatcher Plan - 9 - City Splits
- 191. Hatcher Plan - 10 - Reock Compactness Measure
- 192. Hatcher Plan - 11 - Schwartzberg Compactness Measure
- 193. *Withdrawn*

- 194. *Withdrawn*
- 195. *Withdrawn*
- 196. *Withdrawn*
- 197. *Withdrawn*
- 198. *Withdrawn*
- 199. Singleton Congressional Plan 2 (narrow)_Population Summary_VAP
- 200. Singleton Congressional Plan 2
- 201. Singleton Congressional Plan 2_District Statistics_AP
- 202. Singleton Congressional Plan 2_District Statistics_Blk Wht
- 203. Singleton Congressional Plan 2_Letter size map
- 204. Singleton Congressional Plan 2_Population Summary
- 205. Singleton Congressional Plan 2_Population Summary_AP
- 206. Singleton Congressional Plan 2_Population Summary_VAP AP
- 207. *Withdrawn*
- 208. *Withdrawn*
- 209. *Withdrawn*
- 210. *Withdrawn*
- 211. *Withdrawn*
- 212. *Withdrawn*
- 213. *Withdrawn*

- 214. 2002 Congressional Districts – Map and Plan Statistics (SOS000940)
- 215. Proposed Alabama Senate Districts Functionality Examination
- 216. Calendar – Public Hearing
- 217. *Withdrawn*
- 218. *Withdrawn*
- 219. *Withdrawn*
- 220. *Withdrawn*
- 221. *Withdrawn*
- 222. All Driver License Transactions (SOS153408)
- 223. ALEA DL Office Closure Locations (SOS153492)
- 224. Memorandum of Agreement Between the U.S. Department of Transportation and the Alabama Law Enforcement Agency (SOS154745)
- 225. Memorandum of Understanding between the United States, through USDOJ, and the State of Alabama, Secretary of State, and Alabama Law Enforcement Agency, available at <https://www.justice.gov/opa/file/793121/dl>
- 226. Video – *One of Us for All of Us*, Anthony Daniels campaign ad (SOS161595) (*filed conventionally*)
- 227. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature’s Permanent Legislative Committee on Reapportionment: Alabama Port

Authority 2021 Economic Impact Study Report (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055786-820)

228. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Alabama State Port Authority's Annual Comprehensive Financial Report for the Fiscal Years Ended September 30, 2022 & 2021 (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055821-919)

229. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: *USA: A Brief History*, University of South Alabama (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055920-921)

230. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: *About Us*, Lagniappe Mobile (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055946)

231. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Kyle Hamrick, *ALDOT says new bridge and Bayway are financially viable*, Lagniappe Mobile (Dec. 5, 2022) (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055947-948)

232. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: John Sharp,

Redistricting Alabama: How South Alabama could be split up due to Baldwin County's growth, al.com (Sept. 20, 2021) (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055949-955)

233. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: BRATS Schedule for Bayline Mobile-Fairhope (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055956)

234. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Bayline Connects Mobile-Baldwin County Public Transit Systems (Nov. 5, 2007) (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055957)

235. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Russ Henderson, *Business: Making connections with public transit system*, Press-Register (June 24, 2010) (filed in *Milligan* Aug. 18, 2023; Milligan-RC 055958-961)

236. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: South Alabama Regional Planning Commission – website information (filed in *Milligan* Aug. 18, 2023; within Milligan-RC 055962-972)

237. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: South Alabama Regional Planning Commission – Board of Directors 2020-2021 (filed in *Milligan* Aug. 18, 2023; within Milligan-RC 055962-972)

238. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: South Alabama Regional Planning Commission – Member Government Breakdown (filed in *Milligan* Aug. 18, 2023; within Milligan-RC 055962-972)

239. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: South Alabama Regional Planning Commission, 2022 Comprehensive Economic Development Strategy: 5-Year Update 2022-2027 (filed in *Milligan* Aug. 18, 2023; Milligan-RC 056024-035)

240. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Testimony of Congressman Bradley Byrne, Vol. VII, Transcript of Preliminary Injunction proceedings in *Singleton*, *Milligan*, and *Caster*: (filed in *Milligan* Aug. 18, 2023) *(filed in three parts)*

241. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Deposition

testimony of Congressman Jo Bonner in *Chestnut v. Merrill*, Case No 2:18-cv-00908 KOB (N.D. Ala July 30, 2019) (filed in *Milligan* Aug. 18, 2023)

242. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: Deposition Testimony of Congressman Bradley Byrne, *Chestnut v. Merrill* (Jan. 24, 2019) (filed in *Milligan* Aug. 18, 2023) (*corrected description*)

243. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: letter from Jim Blacksher to Dorman Walker (filed in *Milligan* Aug. 18, 2023; Milligan-RC 056263-266)

244. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: letter from Alabama Attorney General Steve Marshall to Dorman Walker (filed in *Milligan* Aug. 18, 2023; Milligan-RC 056318-321)

245. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment: email chain terminating with email from Rep. Chris Pringle to Dianne Harper (July 13, 2023) (filed in *Milligan* Aug. 18, 2023; Milligan-RC 056322-324)

246. Exhibit at the July 13, 2023 proceedings before the Alabama Legislature's Permanent Legislative Committee on Reapportionment:

Memorandum from Mayor of Gadsden Craig Ford, Etowah Co. Mayor's Association Chairman Scott Reeves, and Etowah Co. Commission Chairman Craig Inzer, Jr., to U.S. Rep. Robert Aderholt and Etowah County's State Legislative Delegation (June 26, 2023) (filed in *Milligan* Aug. 18, 2023; Milligan-RC 056325)

247. Letter, Deuel Ross, *et al.* to Reapportionment Committee Members, *VRA Plaintiffs' Remedial Plans* (June 26, 2023) (Milligan-RC 057156-160)

248. Declaration of Lee Lawson

249. Declaration of Mike Schmitz

250. Declaration of Brad Kimbro

251. Declaration of Jeffery V. Williams

252. Certification of candidates of the Alabama Democratic Party for Primary Election to be held on Tuesday, March 5, 2024 (SOS153596)

253. Sample Ballot, Democratic Primary, *etc.*, Montgomery County, AL (March 5, 2024) (SOS153594)

254. Certification of candidates of the Alabama Republican Party for Primary Election to be held on Tuesday, March 5, 2024 (SOS153608)

255. Sample Ballot, Republican Primary, *etc.*, Montgomery County, AL (March 5, 2024) (SOS153595)

256. Sample Ballot – General and Constitutional Amendment Election, Montgomery County (Nov. 8, 2022) (SOS161576)

257. Interim Resolution Agreement between the United States Department of Justice and the United States Department of Health and Human Services and the Alabama Department of Public Health (SOS154729)

258. *Our View: Alabama Senate leadership removes Sen. Scott Beason as chairman of the powerful Rules Committee, and for good reason* (SOS155002)

259. Settlement Agreement in *The Alabama State Conference of the NAACP v. City of Pleasant Grove, Alabama*, Case No. 2:18-cv-02056-LSC (N.D. Ala. 2019) (SOS155010)

260. Excel File – Democratic Party Official 2024 Primary Election Results (SOS154707) (*filed conventionally*)

261. Excel File – 2024 Republican Primary Election Results (SOS155200) (*filed conventionally*)

262. Excel File – Republican Party Official 2024 Primary Election Results (SOS154708) (*filed conventionally*)

263. Josh Moon, *Doug Jones: Alabama Democratic Party “a disaster,” leadership should be replaced*, Alabama Political Reporter (Dec. 5, 2024), available at <https://www.alreporter.com/2024/12/05/doug-jones-alabama-democratic-party-a-disaster-leadership-should-be-replaced/>

264. Video – Interview with former U.S. Sen. Doug Jones, available at <https://www.alreporter.com/2024/12/05/doug-jones-alabama-democratic-party-a-disaster-leadership-should-be-replaced/> (*filed conventionally*)

265. Application for Absentee Ballot Form AV-R1 (Rev. 6.13.2022) (SOS153788)

266. FEC records - Alabama - House District 02 (SOS155105)

267. FEC records - Gregory Albritton (SOS155117)

268. FEC records - James Averhart (SOS155121)

269. FEC records - Napoleon Bracy (SOS155125)

270. FEC records - Dick Brewbaker (SOS155129)

271. FEC records - Merika Coleman (SOS155133)

272. FEC records - Anthony Daniels (SOS155137)

273. FEC records - Defend Alabama (SOS155141)

274. FEC records - Defend Alabama (SOS155144)

275. FEC records - Caroleene Dobson (SOS155148)

276. FEC records - Karla Dupriest (SOS155152)

277. FEC records - Shomari Figures (SOS155154)

278. FEC records - Wallace Gilberry (SOS155158)

279. FEC records - Juandalynn Givan (SOS155162)

280. FEC records - Jeremy Gray (SOS155166)

281. FEC records - Hampton Harris (SOS155170)
282. FEC records - Phyllis Harvey-Hall (SOS155174)
283. FEC records - Willie Lenard (SOS155178)
284. FEC records - Vimal Patel (SOS155182)
285. FEC records - Protect Progress (SOS155186)
286. FEC records - Protect Progress (SOS155190)
287. FEC records - Stacey Shepperson (SOS155194)
288. FEC records - Larry Simpson (SOS155196)
289. FEC records - Belinda Thomas (SOS155198)
290. Governor Ivey Appoints Judge Bill Lewis to Alabama Court of Civil Appeals (Feb. 28, 2024) (SOS155201)
291. Alabama Judicial System, Judge Lewis biography (SOS155100)
292. Order in Pending Case, *Merrill, AL Sec of State, et al. v. People First of Alabama, et al.*, Case No. 19A1063, Supreme Court of the United States (July 2, 2020) (SOS155400)
293. ADOL County Profile - Baldwin County (SOS155493)
294. ADOL County Profile - Barbour County (SOS155515)
295. ADOL County Profile - Bullock County (SOS155537)
296. ADOL County Profile - Butler County (SOS155560)
297. ADOL County Profile - Choctaw County (SOS155585)

- 298. ADOL County Profile - Coffee County (SOS155633)
- 299. ADOL County Profile - Clarke County (SOS155609)
- 300. ADOL County Profile - Conecuh County (SOS155656)
- 301. ADOL County Profile - Covington County (SOS155680)
- 302. ADOL County Profile - Crenshaw County (SOS155702)
- 303. ADOL County Profile - Dale County (SOS155727)
- 304. ADOL County Profile - Dallas County (SOS155750)
- 305. ADOL County Profile - Escambia County (SOS155773)
- 306. ADOL County Profile - Geneva County (SOS155799)
- 307. ADOL County Profile - Greene County (SOS155822)
- 308. ADOL County Profile - Hale County (SOS155844)
- 309. ADOL County Profile - Henry County (SOS155867)
- 310. ADOL County Profile - Houston County (SOS155890)
- 311. ADOL County Profile - Lowndes County (SOS155913)
- 312. ADOL County Profile - Macon County (SOS155936)
- 313. ADOL County Profile - Marengo County (SOS155960)
- 314. ADOL County Profile - Mobile County (SOS155983)
- 315. ADOL County Profile - Monroe County (SOS156006)
- 316. ADOL County Profile - Montgomery County (SOS156029)
- 317. ADOL County Profile - Perry County (SOS156926)

- 318. ADOL County Profile - Pickens County (SOS156948)
- 319. ADOL County Profile - Pike County (SOS156971)
- 320. ADOL County Profile - Russell County (SOS156994)
- 321. ADOL County Profile - Sumter County (SOS157021)
- 322. ADOL County Profile - Washington County (SOS157045)
- 323. ADOL County Profile - Wilcox County Profile (SOS157068)
- 324. ADOL City Areas Civilian Labor Force Data (SOS155608)
- 325. ADOL Data (Not Seasonally Adjusted vs. Seasonally Adjusted)
(SOS155632)
- 326. ADOL Data - Alabama, U.S., & County Area Civilian Labor Force Data
(SOS155679)
- 327. ADOL The Birmingham Career Center - Jefferson County Second
Chance Hiring Fair (SOS157017)
- 328. Alabama Career Centers (SOS161534)
- 329. Alabama Career Center System Area Supervisors (Jan. 1, 2024)
(SOS155583)
- 330. Alabama Career Center System Area Supervisors (April 11, 2024)
(SOS155584)
- 331. Alabama Workforce Development Customer Information Form
(SOS155725)

- 332. What is the Federal Bonding Program? (SOS155796)
- 333. State Allotment Formula Description (SOS155798)
- 334. Alabama Number Unemployed and Unemployment Rate (Apr 2024 Prelim.) (SOS155959)
- 335. Alabama Career Centers (July 1, 2024) (SOS161534)
- 336. City Areas Civilian Labor Force Data (SOS161539)
- 337. ADOL Data (Not Seasonally-Seasonally Adjusted) (SOS161540)
- 338. Alabama, U.S. and County Areas Civilian Labor Force Data (SOS161541)
- 339. Veterans' Annual Job Fair (SOS161542)
- 340. Annual Gulf Coast Veterans' Job Fair (SOS161543)
- 341. ADOL Alabama Number Unemployed and Unemployment Rate (May 2024 Preliminary) (SOS161544)
- 342. Employees in Nonagricultural Industries in Alabama (SOS161545)
- 343. ADOL Retail Salespersons, Registered Nurses, and Supervisors of Retail Sales Workers are the Top Jobs in May (June 2024) (SOS161547)
- 344. ADOL The Demopolis Career Center is Partnering in the Marengo County Hiring Event (June 11, 2024) (SOS161552)
- 345. ADOL The Mobile Career Center to Host Fall Hiring Event in the Mobile County-Mobile Area (Sept. 22, 2023) (SOS161557)

346. ADOL The Mobile Career Center to Host Job Fair for the Alabama Department of Transportation (Jan. 11, 2024) (SOS161562)

347. ADOL The Mobile Career Center to Host Multiple Employer Job Fair (July 31, 2023) (SOS161567)

348. ADOL The Mobile Career Center will be hosting the 2024 Gulf Coast Veterans' Job Fair (April 10, 2024) (SOS161572)

349. ADECA 2023 Annual Report (SOS154710)

350. Video – Broadband Capital Projects Fund Announcement with Governor Ivey (SOS157720) (*filed conventionally*)

351. Five-Year Action Plan Executive Summary (Aug. 2023) (SOS157206)

352. Sen. Bobby Singleton, *Bobby Singleton: Bridging the Digital Divide in Alabama's Black Belt*, YellowhammerNews.com (Dec. 2, 2024), available at <https://yellowhammernews.com/bobby-singleton-bridging-the-digital-divide-in-alabamas-black-belt/>

353. ADECA Press Release: ADECA releases state's official Alabama Broadband Map, Connectivity Plan (Jan. 5, 2022) (SOS157124)

354. ADECA Press Release: ADECA to host listening session for \$501 million in recovery funds from 2020 hurricanes (Aug. 2022) (SOS157127)

355. ADECA Press Release: Alabama Community Broadband Technical Assistance Program (TAP) (SOS157447)

356. ADECA Press Release: Gov. Ivey announces ARC award to help bring jobs to Macon County (May 8, 2024) (SOS158506)

357. ADECA Press Release: Gov. Ivey announces grant to prep Tuskegee site for new auto supplier industry (Sep. 27, 2023) (SOS158509)

358. ADECA Press Release: Gov. Ivey announces grant to repair drainage in Tuskegee (Oct. 18, 2023) (SOS158512)

359. ADECA Press Release: Gov. Ivey awards \$1.4 million to improve recreation at several locations in Alabama (July 18, 2024) (SOS158514)

360. ADECA Press Release: Gov. Ivey awards \$2.9 million to help weatherize homes of elderly, low-income residents (March 25, 2022) (SOS158517)

361. ADECA Press Release: Gov. Ivey awards \$5.8 Million in grants to weatherize homes of low-income residents (April 11, 2024) (SOS158520)

362. ADECA Press Release: Gov. Ivey awards grant for Juvenile Justice Summit (July 25, 2024) (SOS158523)

363. ADECA Press Release: Gov. Ivey awards grant to help create jobs in Livingston (May 20, 2024) (SOS158525)

364. ADECA Press Release: Gov. Ivey awards grant to help former inmates find employment (Jan. 31, 2023) (SOS158527)

365. ADECA Press Release: Gov. Ivey awards grant to support domestic violence victims in Black Belt (July 22, 2022) (SOS158529)

366. ADECA Press Release: Gov. Ivey awards grant to support industrial project bringing 170 jobs to Tuskegee (June 20, 2023) (SOS158531)

367. ADECA Press Release: Gov. Ivey awards more than \$46 million help low-income families cover home heating and cooling costs (Dec. 12, 2023) (SOS158533)

368. ADECA Press Release: Gov. Ivey awards over \$3 million for weatherization assistance (July 24, 2023) (SOS158536)

369. ADECA Press Release: Governor awards grant for drug court program in Dallas County (Feb. 14, 2023) (SOS158539)

370. Director Kenneth Boswell, *Kenneth Boswell: Fiber is the gold standard, superior to other forms of broadband delivery*, YellowhammerNews.com (July 24, 2024) (SOS158968)

Respectfully submitted,

Steve Marshall
Attorney General

s/ Misty S. Fairbanks Messick
Edmund G. LaCour Jr. (ASB-9182-U81L)
Solicitor General

Soren Geiger (ASB-0336-T31L)
Assistant Solicitor General

James W. Davis (ASB-4063-I58J)
Deputy Attorney General
Richard D. Mink (ASB-4802-M76R)
Misty S. Fairbanks Messick (ASB-1813-T71F)
Brenton M. Smith (ASB-1656-X27Q)
Benjamin M. Seiss (ASB-2110-O00W)
Charles A. McKay (ASB-7256-K18K)
Assistant Attorneys General

OFFICE OF THE ATTORNEY GENERAL
STATE OF ALABAMA
501 Washington Avenue
P.O. Box 300152
Montgomery, Alabama 36130-0152
Telephone: (334) 242-7300
Fax: (334) 353-8400
Edmund.LaCour@AlabamaAG.gov
Soren.Geiger@AlabamaAG.gov
Jim.Davis@AlabamaAG.gov
Richard.Mink@AlabamaAG.gov
Misty.Messick@AlabamaAG.gov
Brenton.Smith@AlabamaAG.gov
Ben.Seiss@AlabamaAG.gov
Charles.McKay@AlabamaAG.gov

Counsel for Secretary of State Allen

s/Michael P. Taunton
J. Dorman Walker (ASB-9154-R81J)
BALCH & BINGHAM LLP
Post Office Box 78 (36101)
445 Dexter Avenue, Suite 8000
Montgomery, Alabama 36104
Telephone: (334) 269-3138
DWalker@Balch.com

Michael P. Taunton (ASB-6833-H00S)
Riley Kate Lancaster (ASB-1002-X86W)
BALCH & BINGHAM LLP
1901 Sixth Avenue North, Suite 1500
Birmingham, Alabama 35203
Telephone: (205) 251-8100
MTaunton@Balch.com
RLancaster@Balch.com

Counsel for Sen. Livingston & Rep. Pringle