

*Alabama State Conference of NAACP v. Allen*, No. 2-21-cv-1531 (N.D. Ala.)  
*In Re Redistricting*, No. 2:25-mc-1682-AMM (N.D. Ala.)

**Declaration of Baodong Liu, Ph.D.**  
**October 28, 2025**

This declaration addresses the specific statement of the Special Master in his Report and Recommendation of the Special Master dated October 24, 2025, on my effectiveness analysis (EA) of the D.D. Remedial Plans. More specifically, the Special Master stated that he “did not use the 2024 elections, despite the fact that Dr. Liu considered these elections in his remedial report and Defendant accepted them in later correspondence. While the 2024 elections would be probative because of their recency, there is no expert analysis and identification of the Black-preferred candidates in those contests.” This declaration, therefore, provides the detailed information about the 2024 elections and the EA results concerning the D.D. Remedial Plan 5, which I understand is identical to the Special Master’s Remedial Plan 3.

As indicated in my previous declaration dated October 15, 2025, my EA analyzed the 2024 Presidential and the 2024 Alabama Supreme Court Chief Justice elections. In the 2024 Presidential election, Kamala Harris, the Black candidate, ran against Donald Trump, the White candidate, while the 2024 Alabama Supreme Court Chief Justice election featured Greg Griffin, the Black candidate, against Sarah Stewart, the White candidate.

Using Gary King’s EI method, it is estimated that the Black-preferred-candidates (BPC) in the Presidential and the Supreme Court Chief Justice elections are Harris and Griffin, respectively, in both State Senate Districts (SD) 25 and 26 of the D.D.5 Plan. More specifically, 95.1% and 96.0% of the Black voters in SD 25 and SD 26 voted for Harris, respectively, while only 19.4% and 13.4% of the White voters voted for her in SD 25 and SD 26, respectively. In the Supreme Court race, 96.3% and 96.4% of Black voters in SD 25 and SD 26 voted for Griffin, respectively, while only 13.7% and 13.3% of the White voters voted for him in SD 25 and SD 26, respectively. The detailed results of these 2024 elections in SD 25 and SD 26 concerning the D.D.5 Plan are shown in Table 1, reflecting the defeat of both Black-preferred candidates in SD 26 in the two 2024 races analyzed.

Table 1: EA Results concerning the D.D. 5 Plan

Black-Preferred/Black Candidate Success in the 2024 elections				
	SD 25		SD 26	
	Contests Won (Out of 2)	Average Margin of Victory	Contests Won (Out of 2)	Average Margin of Defeat
D.D. Plan 5	2	14.6%	0	-4.3%

I declare under penalty of perjury that the foregoing is true and correct.



Baodong Liu, PhD

Dated: October 28, 2025