FILED
2023 Sep-06 PM 03:35
U.S. DISTRICT COURT
N.D. OF ALABAMA

UNITED STATES DISTRICT COURT
NOIRTHERN DITRICT OF ALABAMA
SOUTHERN DIVISION

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

EVAN MILLIGAN, et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	**Case No.: 2:21-cv-1530-AMM**
WES ALLEN, in his official capacity as Secretary of State of Alabama, et al.,	)	**THREE-JUDGE COURT**
	)	
Defendants.	)	

BRIEF OF *AMICUS CURIAE* QUIN HILLYER

Quin Hillyer, *amicus curiae*, submits this brief in support of the proposed remedial plan. Through this Brief and its supporting Exhibits, *Amicus* will demonstrate the importance of keeping Mobile County intact.

1.Introduction

In its initial opinion, this three-judge federal district court concluded that "the appropriate remedy" for the State's failure to draw two black-majority districts in its seven-member congressional plan is a redistricting plan "that includes either an additional majority-Black congressional district, or an additional district in which Black voters otherwise have an opportunity to elect a representative of their choice." *Singleton v. Allen*, 582 F. Supp. 3d 924, 936 (N. D. Ala. 2022), *aff'd sub nom Allen v. Milligan*, 599 U.S. ___ (U.S. June 8, 2023).

Drawing a second majority-black congressional district in Alabama's seven-member congressional plan presents serious practical difficulties. While the Black population is 27% of Alabama's total population, it is not population alone but its distribution that controls. In that regard, a remedial plan that links Prichard in Mobile County, along the Alabama River and Mobile Bay, with Abbeville in Henry County looks much like racial gerrymandering because those two municipalities have nothing in common other than race. So, too, with a spur running into Mobile County that picks up only majority-black Census blocks.

Accordingly, a district in which the population is less than 50% Black but in which the minority still has the opportunity to elect its candidate of choice should be the preferred remedy.

2. Factual Background

Hillyer submits the following Exhibits with this Brief:

AC1 Declaration of R. Quin E. Hillyer

AC2 Map of Remedial Plan of Quin Hillyer

AC3 Population of Remedial Plan Districts

AC4 Precinct Assignments in Hillyer Remedial Plan

These exhibits show the importance of preserving Mobile County as an integral whole. The plan contains one majority-black district and another in which the Black VAP is slightly more than 45%. See AC3 at 2. On its face, Hillyer's plan complies with this court's instructions.

Hillyer explains that, in drawing his plan, he "worked to keep the resulting lines largely contiguous, compact, and culturally logical, rather than snaking in strange ways (as effectively outlawed in *Cooper v. Harris* and *Shaw v. Reno* before it) that made race the sole determinant of the line." AC1 at 3. He also focused on relative compactness, contiguity, preserving county lines, and preserving communities of interest in drawing districts. *Id.* at 3-4. In addition, he considered "topography/natural features/man-made significant dividers, such as rivers, mountains, and highways," and "historical practice." *Id.* at 4.

Hillyer notes that he spilt four counties that have been historically split: Jefferson, Montgomery, Tuscaloosa, and Shelby. *Id.* at 4. Each of those counties is also fairly heavily populated. Hillyer also split Barbour County for population purposes, using Lake Eufaula as a dividing point, and took three precincts from

Cherokee County and combined them in the district containing DeKalb County. *Id.* at 4-5.

Hillyer points out how his plan follows geographic and man-made features, *Id.* at 5-6. In particular, the Alabama River and Interstates 59 and 65 serve as dividing features.

In drawing his plan, Hillyer used an online software tool called "Dave's Redistricting." *Id.* at 7. That software does not allow for the splitting of precincts. Even so, the resulting plan contains districts that are all within 0.1% of the mean district population, while drawing districts that "*are drawn directly to respect and comply with,* not avoid, every one of the other traditionally court-approved requirements for redistricting." *Id.* (emphasis in original).[1]

With respect to Mobile County, Hillyer observes that Justice Thomas noted the commonality of interest between Mobile and Baldwin Counties. *Id.* at 12. They are Alabama's "only coastal counties" and the two "centered on Mobile Bay." *Id.* he explains, "Absent the *Allen v. Milligan* decision, they should stay together. Alas, I believe every analyst and every computer model existent has found no arithmetical way to keep both together while creating two districts statewide that are *definitely* opportunity districts or better." Id. at 12-13 (emphasis in original). Hillyer split those counties sending Baldwin County to another district, while preserving the integrity of Mobile County. The alternative would have been "to racially gerrymander the

[1] If more exactitude in equalizing the population of the districts is required, only six precincts may have to be split. *Id.* at 8.

districts so as to keep the heavily white parts of Mobile together with Baldwin, while snatching the African-American-heavy neighborhoods of Mobile for a second district." *Id.* at 13.

As Hillyer notes, "of all the population centers in Alabama, {Mobile] is almost certainly the one where racially polarized voting is the least prevalent." Id. He explains that, when Mobile was still majority-white, it elected the African-American Democrat Sam Jones as Mayor. Since 2013, even as Mobile's population has become majority-black, the City has elected white Republican Sandy Stimson as Mayor. *Id.* Other instances of cross-racial voting patterns are also present. *Id.* at 14.

Mobile's City Council further has a supermajority vote requirement that effectively requires one or more Council members from each race to enact legislation. Hillyer explains, "As the Council for decades has featured at least three members of each race, this [supermajority vote] requirement means that for decades no law could be passed without votes from members of each race." *Id.* at 15.

Educationally and economically, Mobile County "operates as a single community." *Id.* at 17. "In the past 20 years, civil ties have been remarkably strengthened between the cities of Mobile and Prichard, along with the unincorporated community known as Africatown that borders both." *Id.* at 16. Council and other municipalities int the County have worked together to attract industry that "employ[s] black and white alike, from all across the county rather than any single neighborhood." *Id.* at 17. "In sum, Mobile County is a single, dross-racial community of interest, if ever there were one." *Id.* at 18.

3. Argument

The Supreme Court has held that the remedial powers of federal courts in redistricting cases are limited. *Upham v. Seamon*, 456 U.S. 37 (1982). There, the Court explained that "[a]n appropriate reconciliation" of "the requirements of the Constitution with the goals of state political policy" is achievable "only . . . the district court's modification of a state plan are limited to those necessary to cure any constitutional or statutory defect." *Id.* at 43. It observed that the district court should "choose the plan which most closely approximate[s] the state-proposed plan." *Id.* at 42 (discussing *White v. Weiser*, 412 U.S. 783, 797 (1973)).

Hillyer's plan satisfies both this Court's requirements and those established by the Supreme Court. It creates on majority-black district and one opportunity district. It does so while making the population of each district as nearly equal as may As the Supreme Court has explained, "Article I, § 2 . . . 'permits only the limited population variances which are unavoidable despite a good-faith effort to achieve absolute equality, for which justification is shown." *Karcher v. Daggett*, 462 U.S. 725, 730 (1983) (quoting *Kirkpatrick v. Preisler*, 394 U.S. 526, (1969)). The population variance in Hillyer's plan are minimal, result from the limitations of the software he used, and can be cured with little effort if necessary.

Finally, after observing the State's race-neutral criteria for redistricting plans, Hillyer found a way to preserve Mobile County as an integral whole. Dong so shows respect for Mobile County "as a unique and demonstrable community of interest."

AC1 at 21. In addition, it does so without the indicia of racial gerrymandering that other remedial plans have presented.

Conclusion

This Court should allow Hillyer's participation as *amicus curiae* and adopt his proposed plan because it satisfies this Court's requirements, cures the statutory or constitutional problem it identified, and does so without creating any other statutory or constitutional issues.

Respectfully submitted this 6th day of September 2023,

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CERTIFICATE OF SERVICE

I certify that on this the 6th day of September 2022, I electronically filed the foregoing Brief of *Amicus Curiae* Quin Hillyer using the U.S. District Court for the Northen District of Alabama, Southern Division's electronic filing system, which will send notice of and an accompanying link to this Brief of *Amicus Curiae* Quin Hillyer to the parties who have previously appeared in this case.

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AC1

Declaration of R. Quin E. Hillyer (21 pages follow)

DECLARATION OF R. QUIN E. HILLYER
Pursuant to 18 U.S.C § 1746

Now comes R. Quin E. Hillyer, who deposes and says:

I am a resident and voter in Mobile County, Alabama, with a particular set of interests in, and beliefs pertaining to the importance of, keeping Mobile County as a unified whole for purposes of congressional representation.

For reasons that will be described in detail later in this Declaration, I have for more than three decades closely watched, studied, and written about the development of constitutional law pertaining to political-unit districting.

While I did not agree with the decision of the Supreme Court earlier this summer in *Allen v. Milligan*, I believe the state of Alabama is obliged to comply with it fully, but that the state Legislature, in adopting a new plan produced in the post-*Milligan* special session, did not come close to compliance.

With my deep interest in the twin goals of keeping Mobile County undivided – the material arguments for which, both legally and culturally/historically, will be described later in this declaration – and of fully complying with *Allen v. Milligan*, I have produced the accompanying proposed map of congressional districts for the state of Alabama.

PART A

Before addressing the questions of why Mobile County should be kept undivided and why I in particular believe it so strongly and am knowledgeable enough to produce such a map (in addition to being a dutifully voting resident of the County), I believe it necessary to explain how, and with what goals and under what constitutional guidance, I created the proposed map. To wit:

In producing said map, I paid no heed to the partisan effects of the map except insofar as, to a small degree, they have bearing on the required multi-pronged analysis of whether the one district created as an "opportunity district" actually qualifies as such. I also paid no heed to where current U.S. Representatives from Alabama actually reside (indeed, I have only a vague perception of those facts), as I believe that no representative can (in essence) "lay claim" to a district, but instead that the districts must be drawn in ways consonant with the complicated existing jurisprudence. I also do not personally care, even in the slightest, what the racial makeup is of any district, nor what the ethnicity of its Representative is, except insofar as the courts have dictated.

In producing said map, on matters of the racial composition of the districts, I was guided by Justice Kavanaugh's decisive concurrence in *Allen v. Milligan*

explaining that while states are not required to create a proportional number of "majority-minority" districts, Alabama presents one of the "certain circumstances [in which] courts account for the race of voters" as long as other traditional factors are not violated. The combination of his concurrence with Chief Justice Roberts' decision and with prior Supreme Court decisions, including *Cooper v. Harris* and *Shaw v. Reno*, creates what this Declaration will henceforth call a "plus-race" factor for analysis, whereby race can and indeed should be used as essentially a tie-breaking plus-factor in determining district boundaries. In other words, as I conducted my analysis while drawing the districts, I worked assiduously to create a second black-voter "opportunity district" (to elect a "candidate of choice") that entirely respects the traditional redistricting factors (described immediately below) rather than treats those factors as significantly malleable. For example, in the few instances in which dividing counties did prove essential, I worked to keep the resulting lines largely contiguous, compact, and culturally logical, rather than snaking in strange ways (as effectively outlawed in *Cooper v. Harris* and *Shaw v Reno* before it) that made race the sole determinant of the lines.

The six factors (other than race) that I considered, based on decades of court precedent, as constituting significant and legally important goals include what I call "the four 'C's" plus two others. To wit, the four "'C's": 1) Relative

compactness; 2) *contiguity;* 3) intact *county* lines, where at all possible; and, of extra importance (and this is where I agree that Justice Thomas' dissent was both correct constitutionally and in concert with copious mentions to this effect in earlier court precedent), 4) *communities* of interest. The other two factors, both also quite important, were, 5) topography/natural features/man-made significant dividers such as rivers, mountains, and major highways; and, 6) historical practice.

In the remarkably few instances where my proposed map divides individual counties, those divisions almost exclusively occurred in counties already split up in prior iterations in earlier decades, either as approved by or in some instances ordered by the courts. In particular, the courts' earlier requirement that Alabama feature at least one clearly black-majority district already resulted, after various previous decennial Censuses, in some slicing and dicing of the counties of Jefferson, Montgomery, Tuscaloosa, and Shelby. Those individual counties thus have long been adjudged by the courts to *not* create individual whole-county communities of interest of significance greater than the significance of voting rights for African Americans. In addition to those four counties, only two other counties in my proposal are divided: Barbour, which I regret, but which was arithmetically unavoidable and which is at least done in a way culturally and economically logical, with Lake Eufaula being both a geographic and a cultural

dividing point; and three tiny precincts from Cherokee County which are made part of the district with the immediately adjoining DeKalb County. *In none of those six divided counties are there obvious, significant, and historical sole-county communities of interest to anywhere near the one evident – as noted by Justice Thomas – in Mobile County.* (More explanation available upon request about how and why Barbour is quite sensibly divided at Eufaula, where my grandfather grew up.)

(It might be noted that two cities, Huntsville and Oxford, sprawl into three counties each, and that my proposed district lines put small elements of those cities in different districts. I stayed true to county lines, which I believe is far easier for the actual administration of elections, but in both cases I have no objection if the special master wishes to rejiggle the district lines to keep the entirety of each city in a single congressional district. In both cases, the arithmetic is readily doable while not affecting in the slightest the central issue at dispute, which is how to create at least one black-majority district and one black opportunity district.)

I will note that each of the congressional districts in my proposed map follow remarkably logically with the topography of rivers, mountains, and Interstate highways. District 1, for example, while remaining easily compact enough for

constitutional purposes, does however look at first glance to be slightly less compact than the other six districts. Its shape, however, is entirely logical and culturally/historically appropriate. While keeping counties intact, it essentially follows the Alabama River from Mobile up to Montgomery, with considerable economic, historical, and cultural connections all along it. District 1 contains the Black Belt counties of Wilcox, Lowndes, Dallas, and Marengo, all on the West/North bank of the Alabama River, while the counties that are only borderline Black Belt in terms of soil, practice, and topography – more economically tied to timber than to dirt farming, all on the East/South of the river – are put into District 2. District 2 in turn is an almost-perfectly constructed combination of those border/timber counties with the counties in the "wiregrass" region.

Likewise in the state's northern tier. Other maps wrapped one district from the northwest corner of the state all the way to the northeast corner while hollowing out a north-central section for a completely separate congressional district. My proposed map is far more compact. Essentially, it takes the northeast triangle bordered by Interstates 65 and 59, which also largely matches the state's topography: It features almost all of the highest-elevation land in the state, serving as the "Gateway to the Appalachian Mountains." The district, as drawn, makes perfect sense in terms of logic and geography.

Now, an explanation is in order as to how I designed the map, after having determined that my two major goals were compliance with *Allen v Milligan* while still keeping Mobile County intact. The tool I used was an online site called "Dave's Redistricting." As it does not lend itself easily to precinct splits, and as I believe precinct splits should be avoided anyway because they cause major administrative headaches for election officials and lead to confusion at the polls that can sap public confidence in elections, I knew that absolute numerical equality in district population sizes was virtually unattainable. I believe, though, that I have more than adequately complied with the guidance in *Karcher v. Daggett* "that congressional districts be apportioned to achieve population equality *as nearly as is practicable*." While it is true that the court in that case found the state of New Jersey's districts to not be "as nearly as practicable," I believe that mine are indeed so, as *they are drawn directly to respect and comply with*, not avoid, every one of the other traditionally court-approved requirements for redistricting

In addition to being designed to comply with other requirements and precedents, my districts were created with an absolute, self-imposed requirement for a maximum population deviation that is measurably smaller than that in *Karcher v. Daggett.* I did not rest until every district was within a single tenth of a percent of

the mean. If a district that is *greater than* 99.9% compliant with the mean congressional-district population for the state is somehow *not* "as nearly as practicable" compliant with "one person, one vote" principles, I don't know what possibly can be. (Actually, all my districts are greater than 99.915% compliant with the mean.)

Furthermore, if the court or special master determines that not a single variant from the mean is allowable, that is fine with me and *entirely consonant with the design of my map*. All that would need to be done would be to split up some precincts in the border areas of each district in order to achieve perfect arithmetical equality of population. For reasons mentioned earlier, I think that would be counterproductive for administrative purposes, but it would *not* alter the basic essentials of my design. As long as the result of split precincts still create one black-majority district and one black opportunity district, which I believe will surely be the case with computerized design, then the map otherwise should work. (Dave's Redistricting Analytics for my map notes this: "To achieve almost exactly equal district populations, six precincts may also have to be split, and zero are.")

The next question leading me to a self-imposed statistical requirement was, what actually amounts to an "opportunity district" if it is not a majority-minority district.

As Chief Justice Roberts recounted in *Allen v. Milligan,* there is a string of cases including *Miller v. Johnson* and *Bush v. Vera*, all governed by the "*Gingles* factors," which show that the requirement is that the map come as close as possible to creating another majority-minority district, *while* ***not*** *violating other traditional redistricting principles,* as long as the district in question (in my case, District 1), truly and honestly creates a substantial opportunity for African Americans to elect a candidate of choice. This is generally taken to mean (whether rightly or not) an actual African-American representative. The courts have produced a dizzying array of tests and factors to determine if a district that isn't actually majority-minority still counts as an opportunity district. My goal was to easily meet the "plus-race" consideration *without* overshooting into a *guarantee* of proportional representation achieved *only* by (quoting Justice Kavanaugh) being "forced to group together geographically dispersed minority voters into unusually shaped districts, without concern for traditional districting criteria such as county, city, and town lines."

For purposes of designing my map, I set 1) an absolute requirement that black voting-age population (a more stringent standard than overall black population) in the opportunity district be within three percentage points of the white voting-age plurality; 2) the combination of usually-politically-aligned ethnic minorities (black-Hispanic-Native American) be as close to 50% (or greater) as possible, with

all minorities, including Asian, being a clear majority; and, less importantly but still a factor, 3) that the "partisan lean" noticeably favor the party (Democratic) that in practice has provided the "candidate of choice" for African Americans.

(A side note on that third consideration is in order. Alabama has partisan primaries. Black Democrats now outnumber white Democrats by a huge margin statewide, and the vast majority of black voters choose to participate in Democratic primaries rather than Republican ones. If an African American voting community's "candidate of choice" is assumed to be an African American, as seems to be the high court's assumption – one I do not in theory share, but it is the court's assumption – then if said voting community votes on racial lines, the black candidate of choice would secure the Democratic nomination almost every time. If Democrats in turn have, say, a 10% advantage or more in terms of "partisan lean" of voting patterns, then the Democratic nominee in practice becomes someone who readily gives African American voters a strong opportunity to elect a "candidate of choice.")

The goal of having voting-age population be within three percentage points is somewhat arbitrary, but it serves in practice as a highly useful approximator for the other multitudinous test factors to determine the existence of a real opportunity

district. In designing the map, it served me as a non-negotiable discipline. Note that both for District 7, which is the black-majority district, and District 1, the opportunity district, my goal was not *just* to achieve the bare minimum, but to *at least* achieve it. As it so happened, it took hours of struggle for me to achieve at least those bare minimums without violating other redistricting priorities (as identified by the chief justice and by the Supreme Court through the decades). I was determined not to rest until I found a way to achieve those minimums, which I believe to be essential if a map is to comply with *Allen v. Milligan.* I believe that the map as I have drawn it does indeed fully and quite obviously comply with that decision, as the overall minority population (a clear majority), buttressed by the greater-than-10% Democratic lean, both readily work to provide a greater-than-equal chance for African Americans to elect a "candidate of choice."

Not that the Dave's Redistricting site is official for court purposes, but I note that its "Analytics" page indicates that my map easily meets all four major constitutional recognized "constraints," and that "the 0.17% population deviation [from smallest to largest] is within the 0.75% threshold tolerated by the courts." *Well* within, at that. And my map's rating on the likely "Minority Representation" metric is a perfect 100%.

In sum, I believe that not only is my proposed map *a* way, but that it is probably the *only* way, to sail between the Scylla of *Milligan* (demanding at least two majority-minority or opportunity districts) and the Charybdis of *Shaw v, Reno*, *Cooper v. Harris,* and other cases effectively outlawing districts in which race is the "overriding reason" (*Cooper)* to the demonstrable detriment of communities of interest and compactness. My proposed map, in sum, is by far the one best designed to meet all the considerations recognized by *Thornburg v, Gingles.*

PART B

Having exhaustively explained the map itself, what remains is to explain why Mobile County presents a near-uniquely strong community of interest as a whole that should not be broken up, and, of far less legal importance for purposes of this Declaration, why I in particular feel moved to weigh in.

As Justice Thomas noted, for a full century Mobile and Baldwin Counties have been in the same congressional district, and they form a patently obvious community of interest as the only coastal counties and as the two counties centered on Mobile Bay. Absent the *Allen v. Milligan* decision, they should stay together. Alas, I believe every analyst and every computer model existent has found no arithmetical way to keep both together while creating two districts statewide that

are *definitely* opportunity districts or better. The question then becomes whether to racially gerrymander the districts so as to keep the heavily white parts of Mobile together with Baldwin while snatching the African-American-heavy neighborhoods of Mobile for a second district, *or, on the other hand*, keeping each county whole while dividing them from each other rather than dividing them internally according to race. I believe that by law, by logic, and by ethical considerations, the latter goal is far preferable. Mobile County, which *never* has been divided for purposes of congressional representation, must stay whole.

Mobile should remain inviolate for several reasons born of culture, practice, and history, and also because Mobile, of all the population centers in Alabama, is almost certainly the one where racially polarized voting is the least prevalent. It is thus the one least necessitating a racial remedy outweighing the Supreme Court's longstanding recognition of the importance of non-racial communities of interest.

Consider several data points. *First*, in each of the last five mayoral elections in the city of Mobile, the candidate representing the numerical racial *minority* has won. In 2005 and 2009, Mobile was still majority white, but black Democrat Sam Jones was elected mayor, By 2013 and ever since, Mobile has had an African-American majority, but white Republican Sandy Stimpson has won three straight elections.

(For that matter, white Councilwoman Gina Gregory was re-elected in 2021 in a landslide in a district that had become majority black.) *Second*, just this year the City Council unanimously approved an annexation of unincorporated parts of Mobile County even though the annexation had the much-discussed effect of considerably narrowing the black voting-age plurality of the city as a whole. The black councilmen decided that the size of their racial advantage was less important than the benefits of bringing new territory within city limits.

Third, consider the 2010 Democratic primary for governor. Statewide, white candidate Ron Sparks decisively outpolled black congressman Artur Davis among black voters, while Davis captured 40% of the white Democratic vote. (Those results argue against the assumption of automatically racially polarized voting *statewide*, actually, but one outlier does not negate the rule.) In Mobile County, however, the racial results were even more counterintuitive: Davis carried a *strong* majority of both black *and* white precincts.

These results – Mobile voters showing preferences across racial lines – are rooted in the history of Mobile having a somewhat less volatile experience with integration than the state's other major population centers. Under the leadership of Mayor Joseph Langan, Mobile peacefully integrated municipal golf courses,

libraries, and city buses, leading the *Wall Street Journal* in July 1963 to publish an article headlined, "An Alabama City Builds Racial Peace as Strife Increases Elsewhere." This is not to pretend that Mobile suffered no racial strife, but that historically and culturally it always has been less prone to violence and other virulent racial divisiveness.

Mobile also has a law actually requiring, in effect, that city government operate through supra-racial coalitions. Known as the Zoghby Act, it requires that for almost all municipal ordinances, a super-majority of five City Council members is required for passage, rather than a bare majority of four. As the Council for decades has featured at least three members of each race, this means that for decades no law could be passed without votes from members of each race.

It would be a rather sickening irony if the one Alabama population center with a relatively cross-racial political history should be unnaturally and illogically divided to achieve race-based representational goals.

As it happens, each map I have seen that snakes a separate district through the middle of Mobile County to snatch out just its black-heavy neighborhoods does so in a way dangerously similar to the North Carolina district monstrosities outlawed

by the Supreme Court in that state's major redistricting decisions. Remember that the concurrence of Justice Kavanaugh, without which the *Allen v. Milligan* majority would instead have been a minority, contained the dicta that, even for the purpose of creating an opportunity district, "Courts must *rigorously* apply the 'geographically compact' and 'reasonably configured' requirements." In the case of most or all the plans offered that do break up Mobile County, they do so improperly, by carving out the heavily black-majority city of Prichard along with heavily black neighborhoods of Mobile in ways unexplainable *except* by race. Indeed, to my eye the resulting carve-outs do not look like anything logical or regular, but instead have the visual aspect of a cancerous lesion, spreading irregularly to whatever adjoining area it can next infect.

Much more, in terms of culture and history, suggests that irregularly bifurcating Mobile County would defeat the very cause of racial comity and fairness that the court's patchwork of redistricting precedents intended to promote. In the past 20 years, civil ties have been remarkably strengthened between the cities of Mobile and Prichard, along with the unincorporated community known as Africatown that borders both. The City of Mobile, led by its white Republican mayor Sandy Stimpson, has embraced, encouraged, and supported development of a museum at the Africatown site of the last-ever slave ship (the Clotilda) to dock on U.S.

territory. Stimpson and an African American pastor named Ruby Eldridge also founded an independent, scholarship-based, elementary school, *Prichard Prep* (disclosure: I served on its board for nine years), with an almost entirely African-American student body, which has won major national awards while its happily cross-racial, cross-city-line board has built strong and growing ties across numerous socio-economic strata in the two neighboring cities. Significant aspects of the county's social life also long have been integrated not just *de jure* but *de facto*. (Even the *local* Bay Area Tennis Association, in addition to the nationally-chartered leagues of the U.S. Tennis Association, for decades has featured not just competition *between* teams of different races, but also racial integration *within* almost every team in the league.) The University of Mobile, largely white, sits in Prichard, while Bishop State Community College, largely black, sits in Mobile. The County public school system is the state's largest and fifth-most diverse.

Economically, too, Mobile County operates as a single community. Major employers which in the past 25 years have opened for business (or significantly expanded) here – Austal shipbuilding, Airbus manufacturing, Amazon and Walmart distribution hubs, the port of Mobile, a cruise ship terminal, the AM/NS Calvert steel processing plant, and others – employ black and white alike, from all across the county rather than from any single neighborhood, and almost all were lured to

the county through cooperation and oft-times economic incentives among the full County Commission and the governments of multiple municipalities. The three-person County Commission itself almost never divides along racial lines, but acts as a unified whole.

In sum, Mobile County is a single, cross-racial community of interest if there ever were one. To bifurcate it would run afoul of the reasoning offered by both Justice Kavanaugh and Chief Justice Roberts in their respective opinions in *Allen v. Milligan*, and afoul of the best interpretations of *Gingles, Shaw,* and *Cooper*, among others – especially when a proposed map, mine, is available that does achieve a second black-majority or opportunity district while keeping Mobile (and 60 other counties) intact.

PART C

Finally, while the map and explanation in Part A, supplemented by the information recounted in Part B, stand on their own, and while this Part C is almost immaterial, legally, for the special master's purposes, the special master still may want to know, and may for supplementary legal reasons need to know, the relevant background of the petitioner (me).

I am a veteran independent journalist who has been published on web sites and in daily newspapers across the country, including almost every major newspaper in the country, including multiple times each in the left-leaning *New York Times* and the right-leaning *Wall Street Journal*, and been an expert guest analyst on radio and TV across the country, including MSNBC (left), CNN (center left), and Fox (right). While I write on politics and culture in general, I have been most noted for my coverage of legal/court/constitutional issues, and my work has been cited approvingly numerous times in some of the nation's leading recognized law blogs. And for well over 30 years I have paid close attention to constitutional law related to redistricting, both as a journalist and before that as a Leadership staffer in the U.S. House of Representatives. My father was a lawyer who largely focused on labor law but who handled a few redistricting cases, some of whose pleadings I proof-read for him.

My interests in racial harmony are longstanding. I have served as chairman of the board of a summer educational program (in New Orleans) for a largely African American clientele and as a nine-year board member of the aforementioned Prichard Prep. As a young man I took a leadership role, widely recognized then and in several major retrospective books and news features in the past two years as well, in the three-year-long battle in Louisiana against the political rise of the neo-

Nazi David Duke. When I moved to Mobile in 1998 I wrote forcefully in favor of better race relations, played a large role in turning community opinion from 2-to-1 against to 2-to-1 in favor of a tax for the majority-black public school system, dedicated a three-part series to outlining ways the city of Prichard could escape its position in municipal bankruptcy (literally) and again thrive, and served for a while on the Diversity and Inclusion Task Force of the Mobile United civic organization. I also served as a key member – former Secretary of State John Merrill and his aide Ed Packard will attest to my uniquely active, helpful, and compromise-promoting efforts – on a special task force that successfully updated and streamlined the state's system for re-enfranchisement for former felons.

And that is just a sampling.

I believe to the marrow, and I have written hundreds of columns and editorials over the course of four decades opining, that it is essential for people in general, for community-organizations, and especially for government, to stress commonalities rather than racial differences. And I have particularly worked, since moving to Mobile a quarter-century ago, to promote a unifying vision while chronicling the advances in racial harmony in this county that in geography and culture is, compared to the rest of Alabama, distinctive.

I believe by both logic and law that *if* Mobile County, as a unique and demonstrable community of interest, can be kept whole while the state's congressional overall district map still complies with *Allen v. Milligan,* then it *must* be kept whole. The map I proffer to the special master accomplishes this objective, and it almost certainly is the only map – other than a nearly identical one achieved by subdividing a few border precincts – that can do so. I respectfully ask the special master to adopt this map, for the good of both constitutional law and of the state of Alabama.

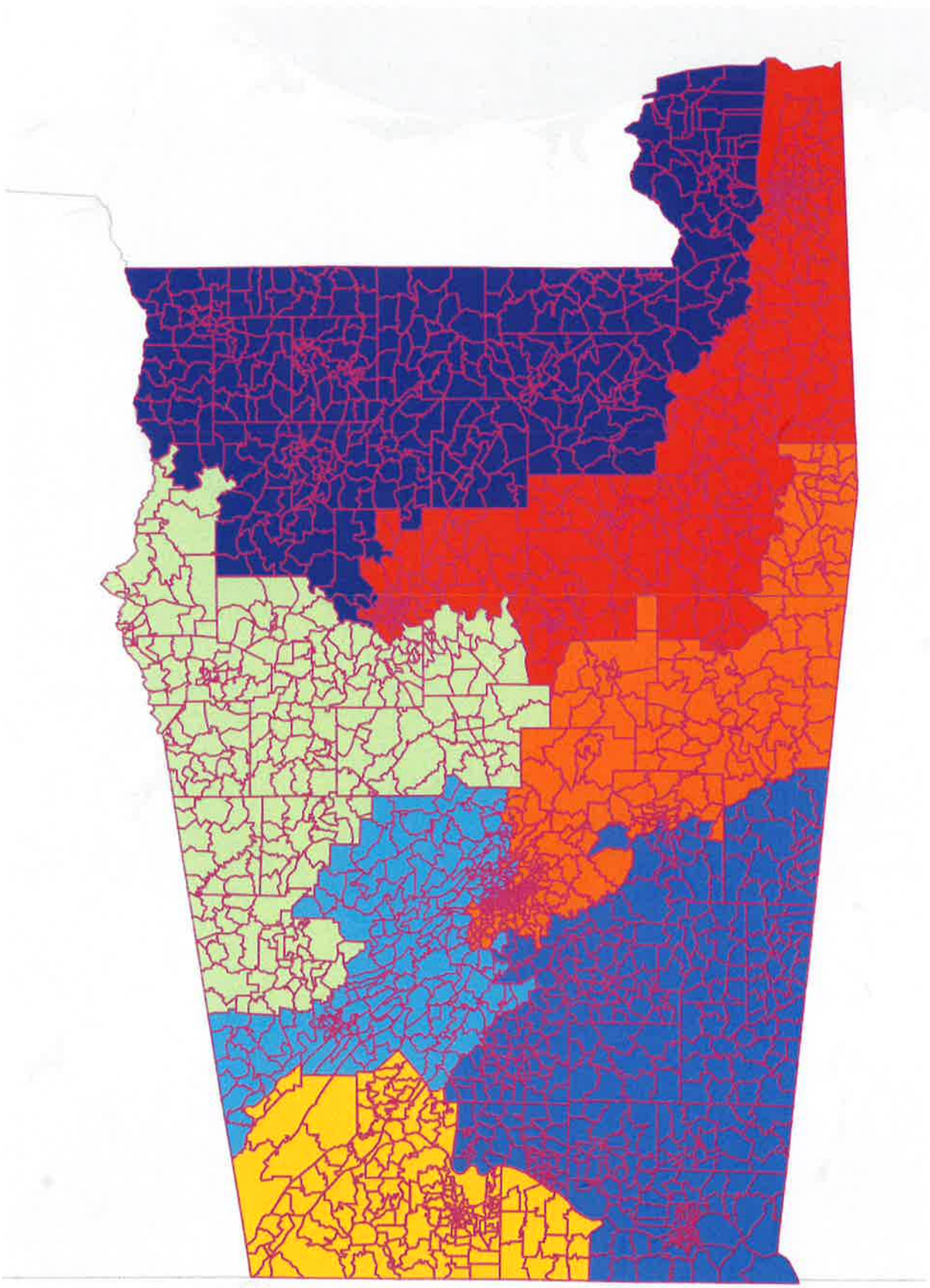
I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 7 day of September, 2023

R. Quin E. Hillyer

AC2

Map of Proposed Remedial Plan (1 page follows)



AC3

Population of Remedial Plan Districts (3 pages follow)

Total VAP	White	Minority	Hispanic	Black	Asian
0	0	0	0	0	0
554823	0.4797	0.5203	0.0284	0.4509	0.0204
561092	0.7065	0.2935	0.0371	0.2091	0.0193
561383	0.6631	0.3369	0.0364	0.2579	0.0222
556903	0.7811	0.2189	0.0387	0.135	0.0201
556500	0.7121	0.2879	0.0665	0.1623	0.0248
565193	0.8147	0.1853	0.046	0.098	0.0102
561272	0.424	0.576	0.045	0.5009	0.0171
559595	0.6547	0.3453	0.0426	0.259	0.0191

Native	Pacific
0	0
0.0225	0.0011
0.0267	0.0015
0.0208	0.0014
0.023	0.0008
0.0366	0.0019
0.0299	0.0009
0.016	0.0012
0.025	0.0012

ID	Total Pop	Devation	Dem	Rep	Oth
Un	0	0	0	0	0
1	717314	-0.0006	0.5501	0.4424	0.0075
2	717478	-0.0004	0.3038	0.688	0.0083
3	717159	-0.0008	0.3566	0.6346	0.0087
4	717827	0.0001	0.2925	0.6943	0.0131
5	717916	0.0002	0.3629	0.6216	0.0156
6	718233	0.0007	0.2475	0.744	0.0085
7	718352	0.0008	0.6507	0.3408	0.0085
	717754	0.0017	0.3962	0.5938	0.0101

AC4

Precinct Assignments in Hillyer Remedial Plan
(40 pages follow)

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