

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

BOBBY SINGLETON, et al., )

*Plaintiffs,* )

v. )

WES ALLEN, in his official )  
capacity as Secretary of State, et al., )

*Defendants.* )

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

**THREE-JUDGE COURT**

**DEFENDANT SECRETARY OF STATE ALLEN'S ANSWERS  
TO SINGLETON PLAINTIFFS' SECOND SET OF INTERROGATORIES**

Pursuant to Fed. R. Civ. P. 26 and 33, Alabama Secretary of State Wes Allen hereby responds to the Singleton Plaintiffs' Second Set of Interrogatories.

**General Statement**

Secretary Allen has relied on the information presently available to him. Further or different information may be discovered during the discovery phase of the litigation. Secretary Allen will amend his Objections and Responses to the extent required pursuant to Fed. R. Civ. P. 26.

Secretary Allen's Responses to each request are made subject to all objections as to privilege, competence, relevance, materiality, propriety, and admissibility, as well as any and all other obligations and grounds that would require the exclusion

of evidence. Secretary Allen reserves the right to make any and all such objections at the appropriate time.

### **General Objections**

Secretary Allen objects to the Instructions to the extent that they purport to impose any requirements or obligations different from those contained in the Federal Rules of Civil Procedure, the local Rules of this Court, applicable orders of the Court, and/or related agreements.

**INTERROGATORY NO. 6:** For any Documents produced in response to Requests for Production Nos. 1–4, identify when the analysis was started, when the analysis was completed, and each person who was involved in conducting the analysis.

**Answer:** Documents produced in response to Requests for Production 1-4 are functionality analyses performed by M.V. Hood III. Dr. Hood prepared the analysis of the Singleton-1 plan on July 28, 2023. He prepared the analysis of the Smitherman-1 plan on July 28, 2023. He prepared the analysis of the Livingston-3 plan on July 21, 2023.

**INTERROGATORY NO. 7:** If you contend that the split of Jefferson County in the 2023 Plan was necessary to comply with the Voting Rights Act, state the basis for that contention.

**Answer:** Secretary Allen does not contend that the split of Jefferson County in the 2023 Plan was necessary to comply with the Voting Rights Act.

**INTERROGATORY NO. 8:** If you contend that the split of the Black Belt counties in the 2023 Plan was necessary to comply with the Voting Rights Act, state the basis for that contention.

**Answer:** Secretary Allen objects to the request on grounds that “the split of the Black Belt counties” could be read to refer to the split of a county that is within the Black Belt, or a division of the counties within the Black Belt between different districts. To the extent it means the former, the 2023 Plan does not split any Black Belt county. To the extent it means the latter, Secretary Allen does not contend that a division of the counties within the Black Belt into different districts was necessary to comply with the Voting Rights Act, and notes that it is not possible to put all Black Belt counties into a single district without cutting off counties in Southern Alabama and violating the one-person, one-vote principle.

\* \* \*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information, and belief based upon information that has been provided to me.

Executed on August 10, 2023

Name: Cory S. Howe

Title: Chief of Staff

As to objections,

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/s/ James W. Davis  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2023, I served the foregoing on all counsel of record by electronic mail.

/s/ James W. Davis  
*Counsel for Secretary Allen*