

UNITED STATES DISTRICT COURT
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 Secretary of State, et al.,)	
)	
<i>Defendants.</i>)	

**DEFENDANT SEN. STEVE LIVINGSTON’S RESPONSE
TO THE *SINGLETON* PLAINTIFFS’ THIRD SET OF
INTERROGATORIES**

Pursuant to Fed. R. Civ. P. 26 and 33, Sen. Steve Livingston hereby responds to the *Singleton* Plaintiffs’ Third Set of Interrogatories.

INTERROGATORY NO. 9: If you contend that the 2023 Plan resulted from a partisan gerrymander (in whole or in part), state the basis for that contention, including all of your arguments, and identify all evidence supporting that contention and any of your arguments.

RESPONSE: While I do not contend that the 2023 Plan is a “gerrymander” of any kind, politics plays a role in the formation of nearly any redistricting map. A map must be able to garner the support of enough individual legislators to become law, for instance. Beyond that, I do not know the motivation or motivations of all the members of the Legislature who voted on the 2023 Plan, and can only speak for

myself. In my case, while satisfying the Constitution and requirements of Section 2 of the Voting Rights Act was paramount, I desired to fulfill these legal requirements without drawing an additional Democratic-leaning district or pairing two Republican incumbents against one another. Other legislators may have had similar motivations. The evidence supporting this contention includes, but may not be limited to, the following: When the bill passed in 2023, Republicans held majorities in both the House and the Senate; Republicans made up a majority of the Permanent Legislative Committee on Reapportionment; Republicans made up a majority of the Senate Standing Committee on Confirmations; bills were voted on in the Senate Standing Committee on Confirmations along party lines; the bill passed both chambers along party lines; the Governor who signed the bill into law is a Republican; State legislators generally do not wish to unseat members of Congress of their own party; no Republican-drawn map paired two incumbents against one another; and while all proponents of maps containing two Democratic-leaning districts were Democrats, all proponents of maps containing more Republican-leaning districts were Republicans.

* * *

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.

Executed on July 24, 2024.

Steve Livingston
Name
Senate Majority Leader / QS
Title

s/ Dorman Walker
Dorman Walker (ASB-9154-R81J)
BALCH & BINGHAM LLP
Post Office Box 78 (36101)
445 Dexter Avenue
Montgomery, Alabama 36104
Telephone: (334) 269-3138
Email: dwalker@balch.com

Michael P. Taunton (ASB-6853-H00S)
BALCH & BINGHAM LLP
Post Office Box 306
Birmingham, Alabama 35201
Telephone: (205) 251-8100
Facsimile: (205) 226-8799
mtaunton@balch.com

Counsel for Representative Pringle and Senator Livingston

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2024, I served the foregoing on all counsel of record by electronic mail.

s/ Dorman Walker
*Counsel for Representative Pringle and Senator
Livingston*