

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BOBBY SINGLETON, *et al.*,

Plaintiffs,

v.

WES ALLEN, *et al.*,

Defendants.

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

THREE-JUDGE COURT

SINGLETON PLAINTIFFS' STATEMENT AS TO SECTION 3(c) RELIEF

The *Singleton* Plaintiffs have not advanced a claim for relief under Section 3(c) of the Voting Rights Act and thus do not have a position on the issues briefed by the *Milligan* parties.¹

The *Singleton* Plaintiffs write separately to request that, in considering and adjudicating the appropriateness of Section 3(c) relief, the Court take pains not to disturb or otherwise prejudice the straightforward relief to all Plaintiffs' Section 2 claims to which all parties have agreed, *see Singleton* Doc. 331, and which the *Singleton* Plaintiffs believe rests on legal and factual findings and conclusions that have largely already been decided by the Supreme Court and which would likely

¹ This filing is being shared with counsel for the *Milligan* and *Caster* Plaintiffs.

warrant summary dismissal of Defendants’ appeal or affirmance of this Court’s judgment by the Supreme Court.

Specifically, the Parties have agreed that, subject to Defendants’ rights on appeal, an injunction barring Defendants from enforcing the 2023 Plan and ordering that the Special Master Plan 3 remain in place for the 2026, 2028, and 2030 congressional elections (as well as all special or other congressional elections prior to the adoption of a new congressional district map based on 2030 census data) would not be separately challenged on appeal by Defendants and would be considered by Plaintiffs to be “a full remedy to the Section 2 violation identified by this Court in the May 8, 2025 Order.” *Singleton* Doc. 331. This proposed injunction and remedy should be put in place irrespective of and without interference from any further discussion or rulings on the appropriateness of Section 3(c) relief.

/s/ James Uriah Blacksher

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2025, a copy of the foregoing has been served on all counsel of record through the Court’s CF/ECF system.

/s/ J.S. “Chris” Christie

J.S. “Chris” Christie

One of the Attorneys for the *Singleton* Plaintiffs