

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

KHADIDAH STONE, *et al.*,

Plaintiffs,

vs.

CHRIS REP. PRINGLE, *et al.*,

Defendants.

Case No.: 2:21-cv-1531-AMM

EXHIBIT 25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

LAQUISHA CHANDLER, et al.,

Plaintiffs,

vs.

WES ALLEN, et al.,

Defendants.

Case No.: 2:21-cv-1531-AMM

**DEFENDANT REP. CHRIS PRINGLE'S
OBJECTIONS AND RESPONSES TO
"PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DEFENDANTS"**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant Rep. Chris Pringle, the House Chair of the Alabama Legislature's Reapportionment Committee, hereby objects and responds to "Plaintiffs' First Set of Interrogatories to Defendants," which were served on July 21, 2023.

General Statement

In providing these responses, Rep. Pringle has relied on the information presently available to him as House Chair of the Reapportionment Committee. Further or different information may be revealed during the discovery phase of this litigation. Rep. Pringle will amend his Objections and Responses to the extent required by Fed. R. Civ. P. 26 and the applicable local Rules of this Court, applicable orders of the Court, and/or related agreements. Rep. Pringle reserves the right to revise, correct, supplement, clarify, and amend his Objections and Responses set forth herein consistent with the Federal Rules of Civil Procedure.

Rep. Pringle's answers to each and every request regarding any person's actions or intent in drafting or considering any districting map are subject to the understanding (and do not waive the arguments) that: whatever the purpose of any person involved in preparing or considering a map, "[t]he 'cat's paw' theory has no application to legislative bodies," *Brnovich v. Democratic Nat'l Comm.*, 141 S. Ct. 2321, 2350 (2021); "determining the intent of the legislature is a problematic and near-impossible challenge," *Greater Birmingham Ministries v. Sec'y of State for State of Alabama*, 992 F.3d 1299, 1324 (11th Cir. 2021); and "the good faith of a state legislature must be presumed," *Miller v. Johnson*, 515 U.S. 900, 915 (1995).

By answering these interrogatories without objection to whether any individual interrogatory is properly counted as more than one interrogatory, Rep. Pringle does not waive his right to object—in response to further interrogatories, if any—to Plaintiffs surpassing the limit on the number of interrogatories that may be served in this proceeding. Rep. Pringle specifically reserves his right to lodge such an objection.

□

General Objections

Rep. Pringle objects to the Definitions and Instructions to the extent that they purport to impose any requirements or obligations different from those contained in the applicable Federal Rules of Civil Procedure, the applicable local Rules of this Court, applicable orders of the Court, and/or related agreements. Rep. Pringle will respond to Plaintiffs' interrogatories in accordance with the Federal Rules of Civil Procedure, the applicable local Rules of this Court, applicable orders of the Court, and/or related agreements. Rep. Pringle understands and interprets Plaintiffs' interrogatories in accordance with standard usage of the English language.

Rep. Pringle objects to each of the requests for production to the extent it seeks information or documents protected by the attorney-client privilege, the joint defense doctrine/attorney-client privilege, common interest doctrine/attorney-

client privilege, the work-product doctrine, deliberative process privilege, law enforcement privilege, legislative privilege, or any other applicable privilege, exemption, or immunity. Rep. Pringle's response to each request is made subject to all objections as to privilege, competence, relevance, materiality, propriety, and admissibility, as well as any and all other objections and grounds that would require the exclusion of evidence. Rep. Pringle reserves the right to make any and all such objections at the appropriate time.

Rep. Pringle further specifically objects to the Definition of "You", "Your", or "Defendant" to the extent that it can be read to suggest that any individual fills the multiple roles listed. Rep. Pringle will read these terms to refer to himself in his official capacity as House Chair of the Reapportionment Committee, and his responses are based on the knowledge of his office.

Rep. Pringle objects to the interrogatories to the extent they are directed to matters which are not no longer relevant to the subject matter at issue in this action, or to the extent Plaintiffs seeks information that is neither admissible nor reasonably calculated to lead the discovery of admissible evidence. In particular, Plaintiffs have propounded several interrogatories that either directly seek information about the House of Representatives 2021 district map or that would otherwise cover the House of Representatives 2021 district map even though Plaintiffs' claims no longer include challenges to any House of Representatives districts. Rep. Pringle objects to these interrogatories as overbroad, outside the scope of permissible discovery, and not proportional to the discovery needs of this case. By responding to any such interrogatories, Rep. Pringle does not waive, and expressly reserves, all such objections.

Rep. Pringle objects to the interrogatories to the extent they seek information that is obtainable from publicly available sources or other sources that are equally available to both parties.

Rep. Pringle incorporates each of these General Objections into his specific objections to each interrogatory below, whether or not each such General Objection is expressly referred to in his objections to a specific interrogatory. Any response provided by Rep. Pringle to the interrogatories shall in no way constitute or be construed as a waiver of the objections contained herein.

Rep. Pringle objects to the interrogatories to the extent they seek information about Alabama Senate districts. Rep. Pringle did not draw, evaluate, or approve the current Senate districts in 2021. Rep. Pringle had no role in the adoption of previous Senate districts.

Responses

INTERROGATORY NO. 1: Identify all consultants, experts, or other individuals whose input, feedback, or advice you sought in drawing, evaluating, or approving Alabama's 2021 state legislative maps, including whether those maps complied with the Voting Rights Act, the U.S. Constitution, and federal and state law.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Without waiving these objections, Rep. Pringle states that he consulted the following individuals as part of his efforts as House Chair of the Joint Legislative Committee on Reapportionment (the "Committee") during the 2021 redistricting cycle:

Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal -- limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle did not draw, evaluate or approve the Senate districts. Rep. Pringle's response to this interrogatory does not purport to cover all

“consultants, experts, or other individuals whose input, feedback, or advice” might have been “sought in drawing, evaluating, or approving” any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs’ claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, as to the House districts, Rep. Pringle consulted with members of the House, Randy Hinaman, and counsel for the Reapportionment Committee. He may also have consulted with counsel from the Attorney General’s office.

INTERROGATORY NO. 2: Identify the criteria that the Committee and/or its agents, including Randy Hinaman, used as redistricting guidelines in creating Alabama’s state legislative districts during the 2021 redistricting cycle, including the weight or priority applied to each factor.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about criteria that “the Committee and/or its agents” used as beyond his knowledge, and responds as to himself. In particular, Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of the Redistricting Committee. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle’s response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which are outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs’ claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle relied on and instructed Randy Hinaman to rely on the Reapportionment Committee Redistricting Guidelines (the “Guidelines”).

INTERROGATORY NO. 3: Identify and describe all guidance and instructions that were provided to Randy Hinaman by you or your agents, employees, or anyone assisting you concerning the process he should employ when drawing the 2021 state legislative districts, the relevant criteria to consider, and what evaluations of his districts should be conducted.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle’s response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs’ claims do not challenge any House of Representatives districts, and therefore this information is

no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle instructed Randy Hinaman to rely on the Guidelines, and to consult with lawyers concerning case law, as needed. Rep. Pringle provided Randy Hinaman with no guidance or instruction concerning the state Senate district map.

INTERROGATORY NO. 4: Describe the 2021 redistricting cycle drafting timeline for Alabama's state legislative districts, including identifying all meetings between Drafters and the Committee and/or its agents.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of the Redistricting Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle met with members of the House of Representative who wanted to meet with him, Dorman Walker, possibly one or more attorney's from the Attorney General's office, Randy Hinaman, the Republican Caucus, and Committee staff during the 2021 redistricting cycle. Rep. Pringle participated in a series of public hearings held by the Reapportionment Committee to receive public comments on redrawing the Alabama's congressional, State Board of Education, Alabama Senate, and Alabama House of Representatives districts. The dates and locations of these meeting are available at https://www.legislature.state.al.us/pdf/2021-Reapportionment/Legislative%20Reapportionment%20Public%20Hearings_Aug%205%20.pdf. Rep. Pringle also participated in two meetings of the Reapportionment Committee in 2021. The dates and minutes of these meetings are available at <https://alison.legislature.state.al.us/reapportionment-meetings-notices-2021>. Except in a general sense, Rep. Pringle's involvement in any meetings concerned solely the 2021 district map for the Alabama House of Representatives. Except for the public hearings and Reapportionment Committee meetings, these meetings happened organically, without a set schedule. During the final week of the 2021 redistricting cycle, prior to introduction of the proposed House of Representatives redistricting map, Rep. Pringle scheduled time to meet with various individual members of the House of Representatives. Rep. Pringle cannot recall each of these meetings, but the schedule will be produced to Plaintiffs.

INTERROGATORY NO. 5: For each map drafted in the 2021 redistricting cycle, identify when it was created, who it was shared with, and when it was first made publicly available.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, any other information protected from disclosure by an applicable privilege or immunity, or maps drafted by Legislators using the State's mapping system and not released by those Legislators, as to which he has no certain knowledge. Rep. Pringle objects to this interrogatory to the extent it seeks information about maps released by other Legislators, as to which he lacks certain knowledge. Rep. Pringle objects to the extent this interrogatory seeks information about maps other than legislative maps, which are irrelevant.

Rep. Pringle further states that this response is provided in his capacity as an

individual member of the House or Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that the 2021 House of Representatives district map was formed over time between the time that the House of Representatives first received 2020 census data from the U.S. Census Bureau in August 2021 and the time that the 2021 district maps were first introduced, the weekend before the Alabama Legislature's Special Legislative Session on redistricting. The Special Legislative Session began on or about October 28, 2021 and lasted five days. Rep. Pringle recalls that the proposed 2021 district maps were shared with legislators on or about October 23, 2021, and that they were first published by Rep. Chris England on or about October 25, 2021.

Rep. Pringle's responses concern only the Alabama House of Representatives district map, although a similar timeline may be applicable to the Alabama Senate district map. Rep. Pringle lacks sufficient knowledge or information concerning the creation, sharing, or publishing of the Alabama Senate district map(s) to provide a response, however.

INTERROGATORY NO. 6: Define the phrase “cores of existing districts,” from the Reapportionment Committee Redistricting Guidelines, as that factor was interpreted and applied by you or your agents, employees, or anyone assisting you, including Randy Hinaman, in creating Alabama’s state legislative districts during the 2021 redistricting cycle.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about the “interpret[ation] and appli[cation]” or a phrase by “agents, employees, or anyone assisting you, including Randy Hinaman,” and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House or Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he instructed Randy Hinaman to follow the Committee's Guidelines, which includes the guidance to “try to preserve the cores of existing districts.” Committee Guidelines at § II.j.(v). Rep. Pringle did not provide Randy Hinaman with additional guidance concerning this phrase. Rep. Pringle would understand the phrase “try to preserve the cores of existing districts,” to mean that it was one of the goals of the Legislature to alter pre-existing district lines only to the degree necessary to comply with the law, new census data, and the other criteria in the Guidelines. Rep. Pringle can only answer

for himself.

INTERROGATORY NO. 7: Identify all communities of interest that the Committee and/or its agents, including Randy Hinaman, identified and credited when drafting and approving Alabama's state legislative districts during the 2021 redistricting cycle.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to any the word "credited" as too vague to allow him to know how to respond, and interprets "credited" to refer to communities of interest considered by him when drafting legislative districts, and responds accordingly. Rep. Pringle objects to the extent this interrogatory seeks information about communities of interest that "the Committee and/or its agents" identified and credited as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House or Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he is unaware of any "communities of interest" identified and affecting any 2021 state Senate district map. Rep. Pringle considered the Springhill community of his home district when the House districts were drawn.

INTERROGATORY NO. 8: For each Challenged District, identify all communities of interest considered or evaluated by you or your agents, employees, or anyone assisting you, including Randy Hinaman, in creating Alabama's state legislative districts during the 2021 redistricting cycle, including which communities of interest impacted the districts adopted.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about communities of interest that "the Committee and/or its agents" identified and credited as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House or Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal—limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he is unaware of any "communities of interest" identified and affecting any 2021 state Senate district

map.

INTERROGATORY NO. 9: For each Challenged District, identify when the district “core” was first drawn or otherwise identified and whether the Committee sought or received any input on the drawing or identification of the district—including the identity of each person who provided said input, when that input was provided, the content of the input, and whether any change was made to the district core as a result of that input during the 2021 redistricting cycle.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about what “the Committee sought or received” as beyond his knowledge, and responds as to himself.

Without waiving these objections, as Rep. Pringle has stated throughout, Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. All “Challenged Districts” are state Senate districts. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. As such, Rep. Pringle has no knowledge of the information Plaintiffs’ Interrogatory no. 9 seeks.

INTERROGATORY NO. 10: For each Challenged District, identify each change made and/or feedback incorporated to a draft map from a legislator.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity.

Without waiving these objections, as Rep. Pringle has stated throughout, Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. All “Challenged Districts” are state Senate districts. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. As such, Rep. Pringle has no knowledge of the information Plaintiffs’ Interrogatory no. 10 seeks.

INTERROGATORY NO. 11: Identify and describe how the Committee, and its agents and employees, defined, monitored, or reviewed its compliance with the VRA and the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution when creating Alabama’s state legislative districts during the 2021 redistricting cycle.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about what “the Committee and its agents and employees defined, monitored, or reviewed,” as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle’s response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory

to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states he instructed Randy Hinaman and Committee staff to follow the Committee Guidelines and consult with lawyers on case law, as needed. In his role as House Chair of the Committee, Rep. Pringle followed the Guidelines and consulted with lawyers on

INTERROGATORY NO. 12: Identify and describe how the Committee and its agents and employees selected districts to perform functionality examinations or effectiveness analysis, including those analyzed in document RC 44600, produced in *Milligan v. Allen*.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about "how the Committee and its agents and employees selected districts to perform functionality reexaminations of effectiveness analysis", as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

At this time, Rep. Pringle is unaware of any information responsive to this Interrogatory no. 12 that is not subject to the attorney-client privilege and/or attorney-work product protection, and declines to respond on that basis.

INTERROGATORY NO. 13: Describe how and when racial data and awareness of racial composition were used in the drafting process of Alabama's state legislative districts during the 2021 redistricting cycle.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he is unaware of "racial data [or] awareness of racial composition [being] used in the drafting process of Alabama's" Senate legislative districts "during the 2021 redistricting cycle."

INTERROGATORY NO. 14: For the 1990, 2000, and 2010 redistricting

cycles, identify who drew, who directed the creation of, what criteria was relied upon, and who determined the criteria of each respective enacted map for State House of Representatives and State Senate.

RESPONSE: Rep. Pringle objects to this interrogatory to the extent it seeks attorney work product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

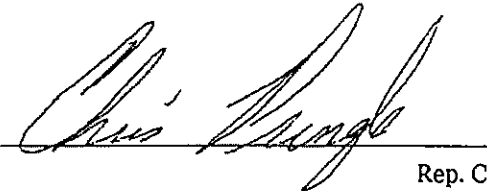
Without waiving these objections, Rep. Pringle is unaware of "who drew, who directed the creation of, what criteria was relied upon, and who determined the criteria of each respective enacted map for State House of Representatives and State Senate" for "the 1990, 2000, and 2010 redistricting cycles." Rep. Pringle believes that Ken Guin, House of Representatives Majority Leader from 1997-2010, and Marcel Black, member of the House of Representatives from 1990-2018, may have led efforts to draw prior district maps for the Alabama House of Representatives, or may have relevant information concerning who did.

VERIFICATION

STATE OF ALABAMA
COUNTY OF MOBILE

Before me, the undersigned notary public, personally appeared Chris Pringle, who, after being first duly sworn on oath, did depose and say as follows:

My name is Rep. Chris Pringle. I am House Chair of the Alabama Legislature's joint Permanent Legislative Committee on Reapportionment, commonly known as the "Redistricting Committee." My responses above includes information provided by others, as well as my personal knowledge, and the facts stated therein are true and correct according to my present information, knowledge, and belief. The answers set forth herein, subject to inadvertent or undiscovered errors, are based on and therefore necessarily are limited by the records and information still in existence, presently recollected, Legislative and thus far discovered in the course of preparation of these answers and responses. Consequently, I reserve the right to make any changes in the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

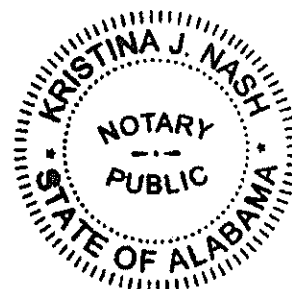


Rep. Chris Pringle

Sworn to and subscribed before me on this the 22 day of March, 2024.



Notary Public



8 | 17 | 2025

My Commission expires :

Done this 25th day of March, 2024.

/s/ Dorman Walker

Counsel for Rep. Chris Pringle



27th day

CERTIFICATE OF SERVICE

I hereby certify that on March ~~25~~ *27*, 2024, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Dorman Walker
OF COUNSEL