

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

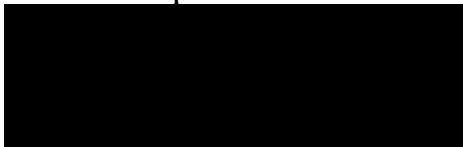
KHADIDAH STONE, <i>et al.</i> ,)	
)	
<i>Plaintiffs</i> ,)	
)	
v.)	Case No.: 2:21-cv-1531-AMM
)	
WES ALLEN, in his official)	
capacity as Alabama Secretary of)	
State, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

STATE DEFENDANTS' SECOND SUPPLEMENT TO THEIR INITIAL DISCLOSURES

Hon. Wes Allen, sued in his official capacity as Alabama Secretary of State, and Rep. Chris Pringle, sued in his official capacity as House Chair of the Alabama Permanent Legislative Committee on Reapportionment, supplement their initial disclosures pursuant to Fed. R. Civ. P. 29(a)(1)(A) as follows:

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Susan Copeland

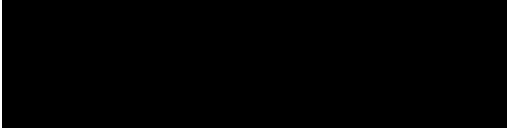


Subject matter of information: Alongside Doyle Fuller, Ms. Copeland represented Pike Road for more than two decades, gaining knowledge of the Town



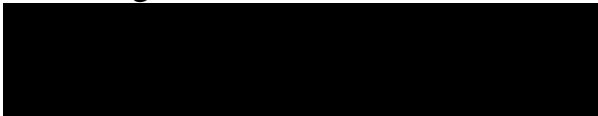
and its leadership, including, but not limited to, annexations and the Town's purchase of Georgia Washington Middle School. Ms. Copeland may have additional knowledge of Pike Road due to being a resident thereof.

Doyle Fuller



(Physical Address)

Mailing Address:



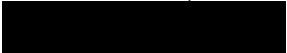
Subject matter of information: Mr. Fuller has extensive knowledge of Pike Road and its leadership, having served as the Town's counsel for its incorporation and for more than two decades thereafter. His representation included, but was not limited to, the incorporation, annexations, and the Town's purchase of Georgia Washington Middle School.

Cathy McNeal, Ed.D.
Chief Strategy & Innovation Officer
Huntsville City Schools


Please contact through:

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Subject matter of information: Dr. McNeal has information about the Huntsville City Schools progress with respect to the desegregation litigation.

Patricia A. Payne PhD.
Pike Road Arts Center
944 Wallahatchie Road
Pike Road, Alabama 36064


Subject matter of information: Dr. Payne is a long-term resident of Pike Road and has information about the founding of the town as well as about the school system and about statements she has previously made concerning the same.

Josh Roberts
Associate Head of School
Alabama Christian Academy
4700 Wares Ferry Road
Montgomery, Alabama 36109


Subject matter of information: Mr. Roberts is the Associate Head of School at Alabama Christian Academy. His promotion to Head of School effective June 1, 2024 has been announced. Mr. Roberts has information about ACA, one of the five primary traditional private schools in Montgomery, Alabama, as well as about the school market he operates within, including the private schools with which he competes and the Montgomery Public Schools.

Billy Ray Todd


Subject matter of information: Mr. Todd is a black Republican who just competed in a special election for Alabama House District 27. He has information about his choice to affiliate with the Republican Party, his motivation to run for public office, his experiences campaigning, and his relationship/interactions with the Alabama Republican Party at the State and/or local level. He also has information about his decision to move home to Alabama and his experiences with racial discrimination, or lack thereof, in Alabama and elsewhere.

Custodian of Records
Alabama State Department of Education

Please contact through:

J. Jason Swann
General Counsel
Office of General Counsel
Alabama State Department of Education
5103 Gordon Persons Building
Post Office Box 302101
Montgomery, Alabama 36130-2101
(334) 694-4699
jswann@alsde.edu

Subject matter of information: If necessary, we will call one or more custodians of records in order to facilitate the admission of Alabama State Department of Education documents included with today's disclosures (and any subsequent disclosures).

The State Defendants reserve the right to call and cross-examine any witnesses listed by any other party. The State Defendants incorporate by reference each of the individuals or entities identified in Plaintiffs' initial disclosures and any supplements or amendments thereto as those individuals and entities may have discoverable information.

The State Defendants reserve the right to call any witness who is deposed in this case irrespective of whether that witness was formally disclosed by any party.

This identification of individuals does not include those who may be used solely for impeachment purposes.

(ii) A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

The State Defendants are today producing documents in *Milligan* via Microsoft OneDrive. Pursuant to an agreement of the parties, these documents are thereby produced in this case as well without the need to produce them twice. The files are password protected, and the password is 88ylheP-EJL0. The Bates range is SOS153401 through SOS154704.

The State Defendants reserve the right to use any and all of the following: documents produced by any party in discovery, including initial disclosures (whether original, supplemented, or amended) and documents made exhibits to depositions; documents filed in this litigation; and, documents produced to both parties as a result of any subpoena issued in this case.

Respectfully Submitted,

Steve Marshall
Attorney General

/s/ Misty S. Fairbanks Messick
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CERTIFICATE OF SERVICE

I certify that on April 10, 2024, I served the foregoing by electronic mail to all counsel of record for the Plaintiffs.

/s/ Misty S. Fairbanks Messick
Counsel for Secretary Allen