

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' FIRST 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.

Col. Jonathan Archer
Director, Department of Public Safety
Alabama Law Enforcement Agency

Please contact through:

Noel S. Barnes
General Counsel

Alabama Law Enforcement Agency
201 South Union Street
Montgomery, Alabama 36104
Noel.Barnes@alea.gov
(334) 676-6101

Subject matter of information: Col. Archer has information concerning the circumstances surrounding ALEA's changes to driver's license office hours in 2015.

Tierre Agnew



Subject matter of information: Mr. Agnew is a black Republican elected from a nearly all white district to serve on the Fayette County Board of Education. He has information about his choice to affiliate with the Republican Party, his experiences campaigning, and his relationship/interactions with Alabama political parties at the State and/or local level. He also has information about his experiences with racial discrimination, or the lack thereof, in Alabama (including as a State of Alabama employee) and elsewhere.

Greg Biggs



Please contact through defense counsel.

Subject matter of information: Mr. Biggs is a former Assistant Attorney General who prosecuted voter fraud in Wilcox County, Green County, Hale County, and Winston County, and has knowledge of the same. As a former employee of the Attorney General's office, Mr. Biggs should be contacted through defense counsel. ***Please note that Mr. Biggs is leaving the country on May 2, 2024 for a trip and will not return before discovery closes.***

Valerie Branyon



Subject matter of information: Ms. Branyon is a black Republican once again campaigning to serve on the Fayette County Commission. She has information about her choice to affiliate with the Republican Party, her experiences campaigning, the doors that opened for her after her last election in 2020, and her relationship/interactions with the Alabama Republican Party at the State and/or local level.

Cedric Coley



Subject matter of information: Mr. Coley, a black man, recently ran for a seat on the Montgomery County Commission as an America First Conservative. He has previously run under his own party banner and in a non-partisan race. He has information about his choice to affiliate with the Republican Party, his experiences campaigning, and his relationship/interactions with the Alabama Republican Party at the State and/or local level.

Karen Landers, MD, FAAP
Chief Medical Officer
Alabama Department of Public Health

Please contact through:

Sancha Howard
General Counsel
Alabama Department of Public Health
Post Office Box 303017
Montgomery, Alabama 36130-3017
(334) 206-5209
Sancha.Howard@ADPH.State.AL.US

Subject matter of information: Dr. Landers has information about ADPH's response to COVID-19, particularly with respect to vaccine distribution.

Bill McCollum



Subject matter of information: Mr. McCollum first ran for Fayette County Sheriff in 1974 and subsequently ran as a Republican twice more since 2000. He is currently running for Fayette County Board of Education. A black man, he has served as Vice Chairman of the Fayette County Republican Party for 15 years and on the State Executive Committee for 15 years. He has information about his choice to affiliate with the Republican Party, his experiences campaigning, and his relationship/interactions with Alabama political parties at the State and/or local level, as well as his appointment to the Alabama Homeland Security Advisory Task Force by Gov. Robert Bentley. He also has information about his experiences with racial discrimination, or the lack thereof, in Alabama and elsewhere.

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.

* * *

These disclosures are based upon information reasonably available at this time. Supplemental information will be provided as required by Fed. R. Civ. P. 26(e).

Respectfully Submitted,

Steve Marshall
Attorney General

/s/ Misty S. Fairbanks Messick
Edmund G. LaCour Jr. (ASB-9182-U81L)
Solicitor General

A. Barrett Bowdre (ASB-2087-K29V)
Deputy Solicitor General

Soren A. Geiger (ASB-0336-T31L)
Assistant Solicitor General

James W. Davis (ASB-4063-I58J)
Deputy Attorney General

Misty S. Fairbanks Messick (ASB-1813-T71F)

Brenton M. Smith (ASB-1656-X27Q)

Benjamin M. Seiss (ASB-2110-O00W)

Charles McKay (ASB-7256-K18K)
Assistant Attorneys General

OFFICE OF THE ATTORNEY GENERAL
STATE OF ALABAMA

501 Washington Avenue

P.O. Box 300152

Montgomery, Alabama 36130-0152

Telephone: (334) 242-7300

Facsimile: (334) 353-8400

Edmund.LaCour@AlabamaAG.gov

Barrett.Bowdre@AlabamaAG.gov

Soren.Geiger@Alabama.AG.gov

Jim.Davis@AlabamaAG.gov

Misty.Messick@AlabamaAG.gov

Brenton.Smith@AlabamaAG.gov

Ben.Seiss@AlabamaAG.gov

Charles.McKay@AlabamaAG.gov

Counsel for Secretary Allen

Dorman Walker (ASB-9154-R81J)
BALCH & BINGHAM LLP
Post Office Box 78 (36101)
445 Dexter Avenue
Montgomery, Alabama 36101
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

CERTIFICATE OF SERVICE

I certify that on March 25, 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