

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA**

KHADIDAH STONE, et al.,

*Plaintiffs,*

v.

WES ALLEN, et al.,

*Defendants.*

Case No. 2:21-CV-01531-AMM

**PLAINTIFF GREATER BIRMINGHAM MINISTRIES' FIRST SUPPLEMENTAL  
RESPONSE TO DEFENDANT ALLEN'S DISCOVERY REQUESTS**

Plaintiff Greater Birmingham Ministries ("GBM") submits the following supplemental response to Defendant Secretary of State Wes Allen's Interrogatory No. 2. This response is based on the information and documents currently available to GBM, and GBM reserves the right to alter, supplement, amend, or otherwise modify their responses in light of additional facts revealed through subsequent inquiry and as appropriate under the Rules. This response is also based on GBM's understanding of each individual Request and not an admission or agreement with Defendant Allen's use or interpretation of terms. To the extent Defendant Allen asserts an interpretation of any Request that is inconsistent with GBM's understanding, GBM reserves the right to supplement its responses and objections.

**SUPPLEMENTAL OBJECTIONS AND RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 2:** (Plaintiffs Greater Birmingham Ministries and Alabama State Conference of the NAACP only): State with specificity the facts supporting your assertion of standing to bring the claims you press in the Fourth Amended Complaint.

**OBJECTIONS TO INTERROGATORY NO. 2:** Plaintiffs object to the extent that this Interrogatory calls for a legal conclusion. Plaintiffs further object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response. Plaintiffs also object to the extent this Interrogatory invades Plaintiffs' privacy interests in violation of the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable law. *See Buckley v. Valeo*, 424 U.S. 1, 66 (1976); *NAACP v. Button*, 371 U.S. 415, 429 (1963); *Louisiana ex rel. Gremillion v. NAACP*, 366 U.S. 293, 296 (1961); *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958).

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:** GBM adopts by reference its prior response to this interrogatory. Greater Birmingham Ministries further identifies Presdelane Harris as an individual GBM member who is a Black registered voter and lives in Montgomery, Alabama. GBM also identifies also a congregational member the Christian Methodist Episcopal Church in Alabama, which includes: Conley Chapel CME, Bethel CME, and Pine Grove CME in Huntsville; New Jones Chapel CME and Garner Memorial CME in Decatur; and Hall Memorial CME in Montgomery, all of which have individual members who are Black registered voters.

DATED this 23rd day of April 2024.

/s/ Alison Mollman

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Respectfully submitted,

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**VERIFICATION OF INTERROGATORY RESPONSES**

I, Scott Douglas, in my capacity as Executive Director of Greater Birmingham Ministries, believe, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information, and belief. I verify as such under penalty of perjury.

A handwritten signature in black ink, appearing to read "Scott Douglas", written over a horizontal line.

Scott Douglas

April 23, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2024, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Davin Rosborough  
Davin Rosborough