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U.S. DISTRICT COURT
N.D. OF ALABAMA

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

JAMES THOMAS, et al., 2:21-cv-1531-AMM

Plaintiff, May 20, 2022

vs. Birmingham, Alabama

JOHN MERRILL, et al., 1:00 p.m.

Defendants.

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REPORTER'S OFFICIAL TRANSCRIPT OF
STATUS CONFERENCE

HONORABLE ANNA M. MANASCO
UNITED STATES DISTRICT JUDGE

HONORABLE COREY L. MAZE
UNITED STATES DISTRICT JUDGE

HONORABLE KEVIN C. NEWSOM
UNITED STATES CIRCUIT JUDGE

COURT REPORTER:
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A P P E A R A N C E S

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Shelita Stewart

Sidney Monroe Jackson

FOR THE DEFENDANTS:

Andrew Harris

Brenton Merrill Smith

James W. Davis

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P R O C E E D I N G S

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JUDGE MANASCO: Good afternoon. All right. Well, thanks for joining us here today. It's quite nice to see everybody in person, instead of on Zoom.

So, as you know, we are here on a motion of the plaintiff following a series of events in the case that culminated in sua sponte stay order from the court. The Second Amended Complaint was filed on February 25th. It asserts, as I understand it, racial gerrymandering and claims under Section 2 of the Voting Rights Act.

The Motion to Dismiss filed on March 11th, we hold that in abeyance. And then the next day, got a report from the parties, we appreciate your willingness to collaborate and work together to that end. We then stayed the case on March the 21st. And on the 28th, we received the Plaintiff's Motion for the Status Conference, which I think still shows is unruled on on the docket sheet, we're all here, so we'll get that taken care of.

We will hear from the plaintiff first. I can say and speak on our behalf, we have read the motion, you don't have to summarize it for us. If there is anything that you want to call to our attention or emphasize, we would love to hear it.

MR. ROSBOROUGH: Your Honor, we asked for the status conference to discuss the stay order and ask the court to reconsider for a couple of primary reasons.

First, we believe the appeal in Milligan does not provide a basis to stay this case, at least in its entirety. The issue before the Supreme Court in Milligan concerns standard under Section 2 of the VRA, specifically whether Alabama congressional districts violate Section 2 of the VRA. That standard does not have a bearing on the racial gerrymandering standard which are the focus of the claims in this case concerning thirty-two state legislative districts.

Milligan is the only case in the current redistricting cycle, which is the case before the Supreme Court, of course, which has been stayed out of at least twenty-six other cases in federal court that bring either VRA and/or racial gerrymandering claims, and the other two courts that have addressed stay motions by the plaintiffs involved redistricting claims in Louisiana and in Texas, both denied those attempts to stay, with the Texas case heading to trial this fall.

Second, a continuing stay here will severely prejudice the plaintiffs and will likely deprive the plaintiffs of any chance for relief until 2026.

Both sides agree that there is a lot of discovery to be done in this case. Racial gerrymandering claims are

district-specific claims.

The defendants, in their part of the submission, asked for the ability to conduct up to fifty depositions in the case. There will likely be discovery involving state legislators which may involve privilege claims that need to be adjudicated by the court.

And the racial gerrymandering claims in this case focus on events that have entirely already happened, they happened last year, events regarding the legislative process, the shape and demographics of the districts drawn and the motivation of the legislators.

And whatever happens in the Supreme Court won't change those facts, it won't change the import of those facts. And if we're looking at the proposition of starting depositions, for example, not until 2023, we're going to be looking at information that's about two years stale by that point. You know, memories fade over time.

So we believe it's important to start soon both because of the quantity and the importance of time here.

And the reason, you know, we're looking for this to be moving and we need to be before 2026 is that where courts have found districts either unconstitutional or in violation of the Voting Rights Act and regularly scheduled elections are in the distant future, courts, at least over a dozen times, have consistently ordered special elections.

Now, if we were to, you know, initially we were looking for a trial this fall, that's obviously off the table at this point, given the status of things, but we believe that a trial which was proposed by the State in the summer of 2023 is very reasonable. It will allow over a full year for discovery, and we will have a decision from the Milligan court at that point as well.

The State in Milligan has asserted that any relief that comes after late or, sorry, after early October 2023 will be too late to implement for the 2024 cycles.

And we believe here, while there may be some other wiggle room in terms of candidate filing deadlines, if it were to be special elections here, it would make the most sense to align them with the primaries and general election occurring in 2024, and because of that, we're really in a position where, if we're not in a point to go to trial by the point that the defendant said was acceptable, summer or at least by September of 2023, we're going to be in a position where it's very difficult to get relief until 2026, even if the court finds that some of these districts in 2023 are unconstitutional.

I'm happy to address any of those issues in greater depth or anything else the court wants to hear, or answer any questions at this point.

JUDGE MAZE: You said that the Supreme Court's

decision won't change the facts. But would it change the questions that you asked? Depending on what they say, do you not see yourself needing to ask different questions of the same witnesses?

MR. ROSBOROUGH: Your Honor, I think for purposes of the racial gerrymandering claims, I don't see that occurring.

As recently as the Wisconsin decision, the Supreme Court has reaffirmed that the racial gerrymandering standard asks, number one, whether race was a predominant factor in drawing the lines of a particular district; and two, if so, whether the State had good reason to use race as a predominant factor such as a compelling interest in drafting a plan in a narrowly tailored way to comply with the VRA.

I think the questions and the facts about what occurred may not change.

Now, it may change how we present the evidence to the court, which is why we're not asking for a trial at this point until after we'll have a decision in Milligan, but we don't believe it will change any of the actual discovery that we need to take about the events that have occurred, the motivations of the legislature.

JUDGE MAZE: Would there be any witnesses or a slate of witnesses that you would be willing to say, if we depose them now, that we are willing to waive any future

depositions of those witnesses, regardless of what the Supreme Court says?

MR. ROSBOROUGH: Your Honor, any fact witnesses, we would be willing to take that position, and any expert witnesses that are solely put up for purposes of supporting the racial gerrymandering claims.

The only category of witnesses where I could see either leaving open the option for supplementation of discovery or just postponing any expert witnesses, that solely goes to the VRA claim, which just focuses on a single State Senate district in the Montgomery area.

JUDGE MANASCO: In Milligan, there is expert testimony that was adduced in support of the constitutional claim that is being used against the Section 2 claim.

So I will ask you the same question I asked at a similar conference in Milligan which is, if we were to do those depositions now, how does the lawyer taking the deposition, the witness being deposed, and the lawyer defending the deposition understand the significance of the testimony and calculate the risks of certain questions and answers such that the deposition to be effective?

MR. ROSBOROUGH: Yes, Your Honor. I think, honestly, any risk there would really be on the side of the plaintiffs, and I think that's a risk we're willing to take.

The State has now filed their brief in the Supreme

Court in Milligan, so we know exactly what their legal positions are. The Supreme Court has set out the question that it's looking to hear. So I think we have a good idea of the range of possibilities that could occur and are willing to, you know, run the risk of putting up witnesses that the State very well -- regardless of what we know or don't know, the State is obviously going to do its best to defend the case and that may involve using evidence from one claim against the other one. And I think we're willing -- any risk there for us is outweighed by the harm in not proceeding at all until some time as late as June of next year in the case.

JUDGE MANASCO: Next question: How does the request to proceed with a trial or proceed with at least readiness for a trial of the constitutional claims in advance of a fully developed record on the Section 2 claims -- I mean, isn't that sort of the reverse order? Isn't the idea that if we develop those records and there's an opportunity to decide a case on statutory grounds rather than constitutional grounds that we should take it?

MR. ROSBOROUGH: Yes, that's a great question, Your Honor. I would say two things in response.

First of all, other than two State Senate districts in Montgomery, the VRA claim should have no affect on our thirty other district challenges of racial

gerrymandering. So it would be a very narrow -- it would be dealing with State Senate District 25 and 26.

Second, as the State is now arguing in the Supreme Court, any sort of, under the State's own position, the court would actually be creating greater constitutional avoidance by adjudicating the racial gerrymandering first. Under their position, under any sort of race-conscious districting, which the VRA require, raises constitutional questions.

Whereas the racial gerrymandering standard is very well laid out and consistent by the Supreme Court.

So, based on the State's own arguments, we believe that pursuing the -- either pursuing the constitutional claims fully without the VRA and either potentially holding those in abeyance presents a reasonable remedy.

Alternatively, given the narrow scope of the VRA claim and the fact that it would be just, for the most part, expert testimony that would be affected on the VRA claim by the factors in whatever the court comes up with in Milligan, that we could potentially sequence expert reports on the VRA claim with still plenty of time to hold a trial by September of 2023. And we think either of those are workable options.

JUDGE MANASCO: Any other questions? Okay. Mr. Davis.

MR. ROSBOROUGH: Thank you very much, Your Honor.

MR. DAVIS: Thank you, Judge. Jim Davis for Secretary Merrill.

And I will start, but I will invite Mr. Walker to pitch in for any other views for his clients.

We think it makes more sense to wait and to hear what the Supreme Court says about the contours of the Section 2 claim and, in doing so, we think they'll necessarily or at least they're quite likely to address Equal Protection Claim.

One of our defenses in court right now is that -- the reason we disagreed with the court's remedy in Milligan was that, in our view, that would have required the State to engage in race-conscious decisions.

We thought plaintiff's proposed remedy required them to divide voters by race.

So we think, and at least one judge, one justice said, they are likely to address whether the plaintiff's remedy was required by Section 2 or, in the alternative, prohibited by the Equal Protection Clause.

So we don't accept plaintiff's contention that equal protection is not going to be a part of the upcoming Milligan, Caster decision. We think it will be.

We also think, Judge Manasco, that you hit on a very blunt point. It's difficult to know how to advise your clients when they are about to be deposed or witnesses for

1 the State before they are about to be deposed. We don't
2 know yet where -- if they try to say something in defense of
3 an Equal Protection Claim, it might put the State in
4 jeopardy of a Section 2 claim, as that claim exists after
5 the Supreme Court rules.
6 We don't know what they are going to do. They
7 could keep the status quo. We could not have a Gingles case
8 anymore. It could be anything in between. We just don't
9 know what it's going to look like.
10 One of your questions, Judge Manasco, was, does
11 the constitutional avoidance doctrine suggest that we ought
12 to wait. I think it does. The plaintiff's raise both Equal
13 Protection and Section 2 claims involving Senate Districts
14 25 and 26.
15 If you look at the map that appears in their
16 complaint, it looks like a proposed map that shows, in their
17 view, that you can draw by districts, has ripple effects all
18 over the State. It changed the district -- the lineup of
19 districts -- the Senate District 33 in Mobile, for example.
20 Senate District 33 currently has part of Baldwin County,
21 they would have it moved all the way into Mobile County
22 because, when you make changes over here, there are domino
23 effects around the State. It isn't just any one district;
24 it impacts other districts.
25 So, it seems to us that it would make sense to

hear -- well, one, wait for the Supreme Court to rule. Let's know what the Section 2 rule looks like before we start building a record.

Number two, possibly address that claim first because it looks like, if they prevail under Section 2, it's going to have ripple effects all over the State.

Although, in fairness, we obviously haven't engaged in discovery, we don't know that's what their map drawer would say, we don't know who the map drawer is, I am just judging by the map that appears in the complaint.

We think there are good reasons for a stay under these circumstances. We haven't briefed it here, but Judge Manasco is familiar with the filing we filed on April 12. For the record, this is in case 21-1530, Document 144, a pleading filed April 12, that we filed before the Caster and Milligan court got us together for a status conference. And there we cited cases where federal courts have stayed litigation in light of upcoming appellate decision that will likely affect the law related to the case.

One of those cases was Miccosukee Tribe found at 559 F.3d 1198, the Eleventh Circuit wrote, "awaiting a federal appellate decision that is likely to have a substantial or controlling effect on the claims and issues in the stayed case is at least a good reason, if not an excellent one, for granting a stay."

We also think there's time. The next election under these districts will not be held until 2026. We know the plaintiffs make an argument they are entitled to some type of special election. We know that has happened in the past. I think the standard is a little tighter now after the North Carolina v. Covington case in the Supreme Court, I believe that's a 2017 decision. But they set out factors that a district court would consider before ordering a special election.

One of those is just the nature and impact of the constitutional violation, how bad was the behavior.

Another is the state sovereignty interest and how much would a special election interfere with the administration of elections.

And here we think plaintiffs are quite unlikely to make their burden. Under the Equal Protection Claim -- certainly they are unlikely to show they are entitled to the extraordinary relief of shortening the constitutional terms of office of every Alabama state legislator.

I know you don't want to prejudge the case, but just for backdrop, we know from the record built in Milligan and Caster what strategy the legislature took during the redistricting trial. They took existing plans, the most recent plans and they adjusted the lines as necessary to bring the districts within roughly equal population. The

record shows what they did in the congressional plan, but the record in this case will show that's what happened on the state legislative districts, too.

So the legislative starting point was a State House map and a State Senate map that was approved by a federal court just in 2016 or 2017 -- 2017, and it was blessed on by the Alabama Legislative Black Caucus, just five years ago, they had no objection to the map after the legislature remedied the violations found by Judge Pryor, Watkins and Thompson in the ALBC.

And from there they made minimal changes as necessary just to adjust for the population shifts so that the population would be roughly equal in the districts.

That's what's being challenged here. We don't know all the contours of plaintiff's claim, I admit that, but that's the starting point.

We think under those circumstances, it would -- the plaintiffs bear a really steep burden to show they are entitled to have completely new legislative elections ahead of the terms of office. That means we think more likely that we have four more years for this court to hear the case after we learn from the Supreme court.

JUDGE MAZE: Do you think, going back to what Mr. Rosborough told me, do you think that the Supreme Court's opinion impacts the way that you would prepare all

of your witnesses for depositions and all of your discovery responses, or can you carve out pieces that are so absolutely unaffected by the Supreme Court they could be done earlier?

MR. DAVIS: I cannot think of anyone, as I stand here right this minute, that I would be willing to say there's no chance that witness' testimony would be affected.

Under the Equal Protection Claims, there's thirty-two districts challenged, I believe, we would foresee taking testimony from officials around the State about the communities of interest involved. And there would be testimony from map drawers about why decisions were made.

We haven't identified who those witnesses would be to talk about community of interest.

But even then, I would be unwilling at this time to say there's no chance that testimony would not be impacted by the Supreme Court's decision. And we think, too, especially for those around 25 or 26 in the Montgomery area where you have overlap between the Equal Protection and the Section 2 claims, it's hard to imagine that if we took a witness now, deposed him or her, that we wouldn't need to reopen the deposition down the road. Seems inefficient, to us, not to wait.

JUDGE MANASCO: Great. Mr. Walker.

MR. DAVIS: Thank you, Judges.

MR. WALKER: Your Honor, to further answer your question, I think the issue before the Milligan court is knowledge of race and use of race; and that's exactly the issue in the gerrymandering case. And it seems to me that there is likely to be some overlap. I can't see how the court could address knowledge of race and use of race in regard to Section 2 without saying something about that in the constitutional context.

So I can't think of anything that might not be affected -- I mean, it could be that they address issues in a way so that doesn't happen. I don't see how that can happen. Even though the two types of claims are analytically distinct, knowledge of race and use of race is at the core.

With regard to special elections, I would just add that another factor is that I don't think it would be hard to get testimony, you could find it also in the case law, that out-of-cycle elections typically have lower voter turnout which is in -- because of voter confusion and they also prejudice the State, the candidates and the parties, by which I mean the Republican and Democrat parties, by the cost of those special elections. It doesn't seem to be any urgency for that here when we could have elections on the regular four-year cycle.

That's all I had to add. Thank you very much.

JUDGE MANASCO: I have one question and that is, do you foresee that there will be legislative immunity issues that we have to deal with? It sounds like maybe some discussion between the parties to that effect.

MR. WALKER: I can tell you that some of the legislators have told me that they will assert immunity. So, yes, ma'am, there will be.

Now, the chairs have obviously waived their immunity. But the testimony of some individual -- yeah, there will be privileges.

JUDGE MANASCO: I think Mr. Davis had something to add.

MR. DAVIS: I do have one point that I forgot to raise earlier.

MR. WALKER: Thank you, Your Honor.

MR. DAVIS: I got out of order. I'm sorry.

I just forgot to mention that we don't yet know enough about plaintiff's claims to know what specific line drawing decisions they claim were improperly motivated by race.

But it is conceivable that if they -- if they show that this particular decision -- that race predominated in this particular case, the State could have a defense under existing Section 2 law that that decision was supported by Section 2. The legislature had a strong basis and evidence

to believe that that decision was necessary in order to avoid a potential Section 2 violation.

I cannot represent to you that there's any such circumstance in this case because we don't yet know enough about plaintiff's claims.

But that's one more reason why I think it's a fiction to separate Equal Protection and Section 2. Section 2 at times can be used as a defense to justify a race-based decision.

I just wanted to add that point.

MR. WALKER: I also failed to make a point. And this may be just over-cautious on my part. But I do represent my clients.

And I'm worried that deposing legislators, to the extent that they agree to be deposed, while the law is undergoing change, may result in them giving answers that seem different or are understood differently once a new standard is announced. Not that they would change their answer necessarily, but that if they don't fully know what the law is, we don't fully know what the law is, which we would not, particularly if whatever the court says about Section 2 interacts with how a gerrymandering claim is defined, asking them to answer questions about things in this case when the law is in a state of actual flux, but not yet revealed to them, seems a bit unfair.

JUDGE MANASCO: Thank you.

Mr. Rosborough, it's your motion.

MR. ROSBOROUGH: Thank you, Your Honor. I will be happy to answer. I have three main points on rebuttal.

First, the parties' joint filing here where we set our respective positions here after the 26(f) conference was after the court took the Milligan case. In that, the defendants did not say we shouldn't go forward on racial gerrymandering claims and they suggested a trial in the summer of 2023 and we agree with that. The only thing that's changed since then was this court's stay order.

So we believe that to sort of delay the assertions of prejudice don't really play out given the State's assertions after the Supreme Court has already undertaken the Milligan case.

Relatedly, you know, neither here nor Milligan have we proposed any particular remedy. Obviously in Milligan there were Gingles I maps put forward to show potential illustrative district; likewise, there's a demonstrative map in this complaint that shows different ways to draw the districts. But any remedial map would necessarily be determined by what the court ordered, how many districts of the ones we've challenged are unconstitutional -- all of them, couple of them, some of them -- so it's really sort of speculative to guess about

what we might or might not need.

The second point about the intersection between the constitutional issues and the VRA issues here. The Supreme Court has clearly laid out the question presented in Milligan and that is whether Alabama's congressional redistricting plan violates Section 2 of the Voting Rights Act.

It didn't offer a broader question about when a State can use or know about race in drawing its districting plans. And all the arguments that the State has made and all the references that Chief Justice Roberts and Justice Kavanaugh made in their stay order in that case were all about the propriety in considering the Shaw standard, the racial gerrymandering standard as part of Gingles I, as part of the VRA claim. It doesn't go the other way.

So, yes, the defendants are absolutely right that the court is considering how the racial gerrymandering standard may affect the plaintiff's evidentiary burden under Section 2, but the inverse of that is not true.

JUDGE MANASCO: The inverse is true for us; right? I mean, in paragraph 225 and 230 of the complaint, you agreed that the districts were gerrymandered because they weren't narrowly tailored in part to comply with the VRA.

MR. ROSBOROUGH: Yes, Your Honor. And I think the Supreme Court is really -- I mean, the Supreme Court just

1 spoke to that in the Wisconsin case where they looked at
2 what the State had done there and they said, this is, you
3 know, this is a State's burden, like, to have a strong basis
4 in evidence for the need to consider race. And if anything,
5 the position that the State is taking in the Supreme Court
6 is that racial predominance should mean it's done, the
7 inquiry is over. That's the State's own position.
8 So they are already taking a position in the
9 Supreme Court that, if accepted, will come back to hurt them
10 in this case.
11 So, really, the status quo is the best case
12 scenario for the State, they're arguing for a standard
13 that's going to be more harmful to them later. And
14 regardless, you know, addressing the issues about what may
15 come out in discovery, the facts are the facts. The
16 legislative process has happened. And hopefully, whoever is
17 testifying under deposition, they are just going to tell the
18 truth about what happened. There is no need to tailor fact
19 witness testimony to what the legal standard might be.
20 I mean, we'll be asking about what considerations
21 were in play, that either were or weren't, they tell the
22 truth or they're not. It's not really a situation -- we're
23 not talking about expert testimony here.
24 The third point I would like to make is that since
25 the Covington case, which Mr. Davis is right, did set out a

more specific standard about when special elections are proper. That's the only case that I'm aware of where the court then denied special election. And the gist of that was, regularly scheduled elections are already occurring next year. Three other cases, Wright v. Sumter County, that was affirmed in the Eleventh Circuit; Navajo Nation v. San Juan County out of the District of Utah, both of those cases did order special elections and apply the Covington standard, as did a three-judge panel in League of Women Voters of Michigan v. Benson case, that was ultimately vacated because that was a partial gerrymandering case and the original decision came down, but the rationale behind the special election, I think, still stands there.

In effect, the defendant's argument here is that plaintiff should bear the full prejudice of any possibility that the VRA standard may in some way on the margins affect the racial gerrymandering test which we think, as we have already put forward, is unlikely and it certainly won't affect the facts that have already occurred here.

As the court in Louisiana just said, Speculation about what the Supreme Court may do, and that is a Section 2 case, that is concerning the actual standard, is not sufficient to put that amount of prejudice on the plaintiffs.

Here, we're dealing with a case that is focused on

racial gerrymandering where the discovery that is going to be taken, the fact discovery about events that have already happened, and as I have said, the plaintiffs are willing to stipulate that we will not redepose any fact witnesses after the Milligan decision comes down, should the court allow us to proceed with discovery.

So, for those reasons, we respectfully ask the court to allow us to proceed and lift the stay, at least with regard to the racial gerrymandering claims, if not the case as a whole.

JUDGE MANASCO: Let me ask, exactly who would you propose to depose if we were able to move forward?

MR. ROSBOROUGH: Certainly, the top of that list would be Mr. Hinaman who was the State's map drawer; Professor -- Dr. M.V. Trey Hood who we understand was the person who performed effectiveness analysis, racial polarization analysis for certain state legislative districts; other remembers of the joint legislative redistricting committee; and potentially other State legislators concerning the input they gave to the committee and the knowledge of their district. So potentially a number of the legislators concerning their challenged districts.

We would certainly also seek document production, emails, text messages, concerning that creation of the

standards that went into redistricting, the decisions of where to draw the lines, the input received, decisions about why and when to apply racial data in the process, information about how the State attempted to comply with the Voting Rights Act. I think there is a wide range of discovery there.

JUDGE MANASCO: One last question that I have, and it may be to Mr. Davis more so than to you.

Any questions that y'all have? Okay. Mr. Davis --

MR. ROSBOROUGH: Thank you, Your Honors.

JUDGE MANASCO: Mr. Davis, what is the secretary's position on how soon we would need to conduct a trial if the special elections were not to occur, meaning for the 2026 election cycle?

MR. DAVIS: For the 2026 election cycle, the schedule would roughly mirror what we had in '22, this year. So it would mean qualifying would be, it was late January, if my memory -- January 28 was qualifying for '22, it would be late January which would mean we would need a trial, I think if we had a trial by the summer of '25, that would leave, even if the court found there were violations, that would leave months for a remedy to be put in place.

MR. ROSBOROUGH: I would ask for surrebuttal.

One point I forgot to make, that's more

specifically to Mr. Walker's point about turnout and the risks of special elections. It's a fair point.

Here, I think we would be looking to align, were the courts to rule in our favor, new districts to be drawn, the whole point here with timing would be to align perhaps, depending on other than the candidate filing deadline, the schedule with the 2024 election. Those are presidential elections, those are the highest turnout elections there are.

We would be looking -- people would be coming out for the primaries and the general elections in presidential years, we think that's a very good fit and it would actually reduce administrative burden on the State localities because they are running those elections.

JUDGE MAZE: Assuming, based on what Mr. Davis just said, we would need to have a trial in the summer of '23 to meet that cycle.

MR. ROSBOROUGH: I believe we would, based on the position -- I will let the State say -- based on the position in Milligan, I think we would need a ruling before early October 2023. But it may be better to address it to Mr. Davis.

MR. DAVIS: In '24, there will not be a presidential primary. Under Alabama law -- '24 will be a presidential primary. Under Alabama law, the primary will

be in May instead of earlier, so everything pushed back earlier, I would say we would need a trial by spring in order to have a -- of '23 --

JUDGE MAZE: April, May?

MR. DAVIS: Qualifying would be in November, so it'd be time for the court to write, time for the legislature to enact new districting plan which cannot -- roughly. I invite Mr. Walker, he's more familiar --

MR. WALKER: It depends on how many districts are affected as to how long it would take to do it. But I would say roughly a month.

JUDGE MANASCO: All right.

JUDGE MAZE: We're good.

JUDGE MANASCO: Thank you all.

(End of proceeding.)

C E R T I F I C A T E

I hereby certify that the foregoing is a correct transcript from the record of the proceedings in the above-referenced matter.

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Teresa Roberson, RPR, RMR