

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

BOBBY SINGLETON, et al.,)
)
Plaintiffs,)

v.)

Case No.: 2:21-cv-1291-AMM

WES ALLEN, in his official)
capacity as Alabama Secretary of)
State, et al.,)

THREE-JUDGE COURT

Defendants.)

EVAN MILLIGAN, et al.,)
)
Plaintiffs,)

v.)

Case No.: 2:21-cv-01530-AMM

WES ALLEN, in his official)
capacity as Secretary of State of)
Alabama, et al.,)

THREE-JUDGE COURT

Defendants.)

MARCUS CASTER, et al.,)
)
Plaintiffs,)

v.)

Case No.: 2:21-cv-01536-AMM

WES ALLEN, in his official)
Capacity as Alabama Secretary of)
State, et al.,)

THREE-JUDGE COURT

Defendants.)

Defendants' Objections to Plaintiffs' Exhibits

	Exhibit Description	Document Identification	Objections
<i>Caster Plaintiffs' Expert Reports</i>			
1	2024 05-17 Expert Report of William S. Cooper		
2	2024 09-06 Corrected Supplemental Report of William S. Cooper		
3	2025 05-17 Expert Report of Maxwell Palmer		
4	2024 07-31 Rebuttal Report of Maxwell Palmer		
5	2025 05-17 Expert Report of Joseph Bagley		
6	2024 07-31 Rebuttal Report of Joseph Bagley		
7	2025 05-17 Expert Report of Traci Burch		
8	2024 07-31 Rebuttal Report of Traci Burch		
9	2023 07-28 Expert Report of Maxwell Palmer in Support of Caster Objections	ECF No. 179-2 (Remedial Hearing Exhibit 1)	
10	2023 07-28 Expert Report of Joseph Bagley in Support of Milligan Objections		

Exhibit Number	Exhibit Description	Document Identification	Objections
11	2021 12-10 Expert Report of William S. Cooper	PI Hearing Exhibits 1-58	
12	2021 12-20 Rebuttal Report of William S. Cooper	PI Hearing Exhibits 59-78	
13	2021 12-10 Expert Report of Maxwell Palmer	PI Hearing Exhibit 79	
14	2021 12-10 Declaration of Bridgett King	PI Hearing Exhibit 80	Hearsay, undisclosed expert testimony (expert withdrawn for trial)
15	2021 12-20 Second Declaration of Bridgett King	PI Hearing Exhibit 81	Hearsay, undisclosed expert testimony (expert withdrawn for trial)
16	2021 12-10 Expert Report of Joseph Bagley		
17	2021 12-20 Rebuttal Report of Joseph Bagley		
<i>Legislative Redistricting Materials</i>			
18	Remedial Plan 3 – Adopted Court Ordered Plan	ECF No. 253	
19	SB 5 Enrolled	ECF Nos. 191-11	
20	2023 SB 5 Enacted Plan (Livingston 3 Plan)	ECF Nos. 165-1, 179-1	

Exhibit Number	Exhibit Description	Document Identification	Objections
21	2023 Enacted Plan Performance Analysis	Livingston Deposition Exhibit 13	
22	2023 Second Special Session Proclamation	ECF Nos. 161-1, 180-2	
23	June 27, 2023 Reapportionment Committee Meeting Minutes	Pringle Deposition Exhibit C (RC 049490)	
24	July 13, 2023 Permanent Legislative Committee on Reapportionment Agenda	Pringle Deposition Exhibit F	
25	July 13, 2023 Permanent Legislative Committee on Reapportionment Hearing Transcript		
26	July 13, 2023 Reapportionment Committee Meeting Minutes	Pringle Deposition Exhibit C (RC 049556)	
27	July 13, 2023 Proposed Amendment to Reapportionment Committee Guidelines	Pringle Deposition Exhibit D	
28	VRA Plaintiffs' June 26, 2023 Letter and Remedial Plan	Pringle Deposition Exhibit B	Hearsay, relevance
29	2023 CLC Map 1	Pringle Deposition Exhibit C (RC 049462-63)	

Exhibit Number	Exhibit Description	Document Identification	Objections
30	2023 Singleton Congressional Plan 3	Pringle Deposition Exhibit C (RC 049464-65)	
31	2023 Hatcher Remedial Congress Plan 1	Pringle Deposition Exhibit C (RC 049468-69)	
32	2023 Community of Interest Plan	Livingston Deposition Exhibit 6	
33	2023 Community of Interest Plan Performance Analysis	Livingston Deposition Exhibit 7; Hinaman Deposition Exhibit 5	
34	2023 Opportunity Plan	Pringle Deposition Exhibit C (RC 049488-89)	
35	2023 Livingston 2 Plan	Livingston Deposition Exhibit 10	
36	2023 Russell Split Plan	Pringle Deposition Exhibit C (RC 049478-79)	
37	2023 Expanded Blackbelt Plan	Pringle Deposition Exhibit C (RC 049473-74)	
38	2023 Whole Jefferson County Plan	Pringle Deposition Exhibit C (RC 049466-67)	

Exhibit Number	Exhibit Description	Document Identification	Objections
39	2023 AKC Remedial Plan 1	Pringle Deposition Exhibit C (RC 049480-81)	
40	2023 Pringle Congressional Plan 1	Pringle Deposition Exhibit C (RC 049491-508)	
41	2021 Enacted Plan	ECF No. 48-5	
42	Redistricting Guidelines adopted by the Alabama Legislative Committee on Reapportionment on May 5, 2021	ECF No. 56-1 (PI Hearing Exhibit 82)	
43	2011 AL Congressional Districts Map	ECF No. 48-11	
44	2021 SBOE Plan	ECF No. 48-14	
<i>Transcripts of Court Proceedings</i>			
45	<i>Caster v. Allen</i> Objections to Special Master Report Hearing Transcript (October 3, 2023)		Hearsay, Relevance
46	<i>Caster v. Allen</i> Motion Hearing Transcript (August 14, 2023)		Hearsay, Relevance
47	<i>Caster v. Allen</i> Status Conference Transcript (July 31, 2023)		Hearsay, Relevance

Exhibit Number	Exhibit Description	Document Identification	Objections
48	<i>Caster v. Merrill</i> Status Conference Transcript (June 16, 2023)	ECF No. 180-1	Hearsay, relevance
49	<i>Caster v. Merrill</i> Preliminary Injunction Hearing Transcript (January 4-12, 2022)	ECF No. 99	Hearsay, relevance
50	Volume 1 of the Trial Transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 103	PI Hearing Exhibit 84	Hearsay, incomplete (will withdraw objections if Volume 4 is likewise admitted)
51	Volume 2 of the Trial Transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 104	PI Hearing Exhibit 85	Hearsay, incomplete (will withdraw objections if Volume 4 is likewise admitted)
52	Volume 3 of the Trial Transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 105	PI Hearing Exhibit 86	Hearsay, incomplete (will withdraw objections if Volume 4 is likewise admitted)
53	Volume 5 of the Trial Transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 107	PI Hearing Exhibit 87	Hearsay, incomplete (will withdraw objections if Volume 4 is likewise admitted)
<i>Deposition Exhibits</i>			
54	Hood et al., <i>The Rational Southerner</i> (Excerpts)	Carrington Deposition Exhibit 9; Hood Deposition Exhibit C	Hearsay, Completeness

Exhibit Number	Exhibit Description	Document Identification	Objections
55	M.V. Hood III and Seth C. McKee, <i>Rural Republican Realignment in the Modern South</i>	Carrington Deposition Exhibit 10	Hearsay
56	Philip Bump and Lenny Bronner, <i>Another lens into the rightward shift of Black and Hispanic Americans</i> , Washington Post (Mar. 11, 2024)	Carrington Deposition Exhibit 11	Hearsay
57	Maya King, <i>Behind the Republican Effort to Win Over Black Men</i> , New York Times (Jun. 10, 2024)	Carrington Deposition Exhibit 12	Hearsay
58	Jeffrey M. Jones and Lydia Saad, <i>Democrats Lose Ground With Black and Hispanic Adults</i> , GALLUP (Feb. 7, 2024)	Carrington Deposition Exhibit 13	Hearsay
59	Russell Contreras, <i>Democrats' big vulnerability: Why they're losing Black, Hispanic voters</i> , Axios (Mar. 13, 2024)	Carrington Deposition Exhibit 14	Hearsay
60	Ralph Chapoco, <i>History; lack of competition, lack of access keep Alabama's voter turnout rate low</i> , Alabama Reflector (Aug. 6, 2024)	Carrington Deposition Exhibit 15	Hearsay

Exhibit Number	Exhibit Description	Document Identification	Objections
61	Emily Cochrane, <i>Alabama Republicans Pass Expansive Legislation Targeting D.E.I.</i> , New York Times (Mar. 19, 2024)	Carrington Deposition Exhibit 16	Hearsay
62	Leada Gore, <i>Jefferson Davis birthday holiday in Alabama is today: What that means to you; will mail run?</i> , AL.com (Jun. 5, 2023)	Carrington Deposition Exhibit 17	Hearsay
63	Hubbard, <i>Storming the State House The Campaign that Liberated Alabama from 136 Years of Democrat Rule</i>	Carrington Deposition Exhibit 18	Hearsay
64	Arizona Congressional Districts Map	Trende Deposition Exhibit 4	Foundation, relevance
65	4/8/22 Expert Report of Sean P. Trende, Ph.D. in <i>Alexander v. South Carolina State Conference of the NAACP</i>	Trende Deposition Exhibit 6	
66	Alabama Regions Map	Trende Deposition Exhibit 7	
67	12/27/21 Memo from Grofman and Trende re: Redistricting Maps	Trende Deposition Exhibit 8	

Exhibit Number	Exhibit Description	Document Identification	Objections
68	Expert Report of Dr. Wilfred Reilly in <i>Stone v. Allen</i>	Reilly Deposition Exhibit 2	
69	Christopher A. Cooper, M.V. Hood III, et al., <i>Switching sides but still fighting the Civil War in southern politics</i>	Hood Deposition Exhibit B	Hearsay
70	State Senate County-Wide Election Analysis 2022	Bonneau Deposition Exhibit 6	
71	State House County-Wide Election Analysis 2022	Bonneau Deposition Exhibit 7	
72	2021 Alabama House Plan	Bonneau Deposition Exhibit 8	
73	2022 Congressional Elections Data and Statistics	Bonneau Deposition Exhibit 10	
74	Billy Ray Todd – Campaign Website	Todd Deposition Pls Exhibit 2	Hearsay, authenticity
75	Billy Ray Todd- Screenshots of X/Twitter Post 1	Todd Deposition Pls Exhibit 3	Hearsay, authenticity
76	Billy Ray Todd – Screenshots of X/Twitter Post 2	Todd Deposition Pls Exhibit 4	Hearsay, authenticity
77	Billy Ray Todd – Twitter Video	Todd Deposition Pls Exhibit 5	Hearsay, authenticity

Exhibit Number	Exhibit Description	Document Identification	Objections
78	HD 27 Special Primary Election Unofficial Results	Todd Deposition Defs Exhibit 1	
79	FY 2023 Community Planning and Development Formula Program Allocations Sheet	Boswell Deposition Exhibit 2 (SOS156602)	
80	ADECA 2023 Annual Report	Boswell Deposition Exhibit 3 (SOS154710-SOS154728)	
81	ADECA, Five-Year Action Plan 2023	Boswell Deposition Exhibit 4 (SOS157206-SOS157230)	
82	ADECA, Agencies Administering Alabama's Low-Income Home Energy Assistance Program	Boswell Deposition Exhibit 5 (SOS156232-SOS156234)	
83	Alabama WAP Local Providers	Boswell Deposition Exhibit 6 (SOS156301)	
84	Biggs Facebook Post 2020 Election	Biggs Deposition Exhibit 3	Hearsay, authenticity
85	PBS, <i>In Alabama, racial disparities in health outcomes predate the pandemic</i> (Jul. 24, 2020)	Landers Deposition Plaintiffs' Exhibit 3	Hearsay

Exhibit Number	Exhibit Description	Document Identification	Objections
86	Alander Rocha, <i>Report: Alabama has poor health system performance, stark health care disparities</i> , Alabama Reporter (Apr. 22, 2024)	Landers Deposition Plaintiffs' Exhibit 6	Hearsay
87	Alabama Performance Data: Health System Performance by Race/Ethnicity	Landers Deposition Plaintiffs' Exhibit 7	Hearsay
88	Sean Dowling, <i>Alabama doctors urging Black women to participate in landmark study on cancer amid low survival rates</i> , 48 WAFF news (May 23, 2024)	Landers Deposition Plaintiffs' Exhibit 8	Hearsay
89	Alabama Public Health, <i>What is Health Equity</i>	Landers Deposition Plaintiffs' Exhibit 9	
90	SB 129 Enrolled	Landers Deposition Plaintiffs' Exhibit 10	
91	<i>AP focuses on Alabama patient in its series on alleged medical racism in the U.S.</i> , Associated Press (May 23, 2023)	Landers Deposition Plaintiffs' Exhibit 11	Hearsay
92	Alabama Public Health, 2020 Maternal Mortality Review	Landers Deposition Plaintiffs' Exhibit 12	

Exhibit Number	Exhibit Description	Document Identification	Objections
93	Alabama Public Health, Infant Mortality Alabama 2022	Landers Deposition Plaintiffs' Exhibit 13	
94	Debbie Elliot, <i>Black residents in rural Alabama demand sanitation equity, saying 'it's a right'</i> , NPR (Oct. 13, 2023)	Landers Deposition Plaintiffs' Exhibit 14	Hearsay
95	Interim Resolution Agreement, DOJ and DHHS and Alabama Department of Public Health 2023	Landers Deposition Plaintiffs' Exhibit 15	Hearsay
96	Expert Report Joseph Bagley, <i>Stone v. Allen</i>	Landers Deposition Plaintiffs' Exhibit 16	Undisclosed expert testimony (not disclosed in this matter)
97	Jefferson County Board of Health, Resolution "Racism as a Public Health Problem" (2021)	Landers Deposition Plaintiffs' Exhibit 17	Hearsay
98	Mike Cason, <i>Alabama GOP's minority outreach message: 'OK to have dark skin' and be Republican</i> , AL.com (Sept. 10, 2022)	Coley Deposition Plaintiffs' Exhibit 1	Hearsay
99	State of the Workforce Report XVII: Southwest AlabamaWorks	Nix Deposition Exhibit 3	
100	Alabama Department of Labor, Mobile County Profile	Nix Deposition Exhibit 4	

Exhibit Number	Exhibit Description	Document Identification	Objections
101	Alabama Career Centers	Turner Deposition Exhibit 2	
102	Alabama Department of Labor – Career Centers Website	Turner Deposition Exhibit 3	
103	Alabama Career Centers – Region 7	Turner Deposition Exhibit 4	
104	Alabama Department of Labor – Labor Market Information	Turner Deposition Exhibit 5	
105	Alabama Career Center System Area Supervisors	Turner Deposition Defs Exhibit 1	
106	Memorandum of Agreement – U.S. Department of Transportation and Alabama Law Enforcement Agency 2016	Archer Deposition Pls Exhibit 4	
107	ALEA DL Office Closure Locations	Archer Deposition Defs Exhibit 1 (SOS153492)	
108	ALEA DL Office Locations	Archer Deposition Defs Exhibit 4	
109	SmartBank Website, Regional Leadership	Williams Deposition Exhibit 4	

Exhibit Number	Exhibit Description	Document Identification	Objections
110	Julia Avant, <i>Rep. Barry Moore beats incumbent to win 1st Congressional Dist. Republican primary</i> , WSFA News (Mar. 7, 2024)	Williams Deposition Exhibit 7	Hearsay
111	Baldwin County EDA Post About Gulf Shores International Airport (Aug. 7, 2024)	Lawson Deposition Exhibit 2	
112	2023 Alabama Tourism Economic Report	Lawson Deposition Exhibit 3	
113	Wiregrass Economic Development – Major Employers	Lawson Deposition Exhibit 4	Hearsay
114	Baldwin by the Numbers	Lawson Deposition Exhibit 5	
115	USDA 2022 Census of Agriculture – County Data	Schmitz Deposition Exhibit 7	Incomplete, lack of foundation, relevance
<i>RFAs and ROG Responses</i>			
116	Secretary’s Response to First Set of Interrogatories		
117	Secretary’s Response to Second Set of Interrogatories		
118	Sen. Livingston Response to Third Set of Interrogatories		

Exhibit Number	Exhibit Description	Document Identification	Objections
119	Rep. Pringle Response to Third Set of Interrogatories		
120	Sen. Livingston and Rep. Pringle Response to Final Set of Interrogatories		
121	Secretary's Response to Final Set of Interrogatories		
122	Sen. Livingston and Rep. Pringle Response to Caster Requests for Admission		
123	Secretary's Response to Caster Requests for Admission		
<i>Stipulated Facts</i>			
124	Joint Stipulated Facts for Remedial Proceedings	ECF No. 213	Not stipulated for purposes of trial on the merits
125	Joint Stipulated Facts for PI Proceedings	ECF No. 44	Not stipulated for purposes of trial on the merits
126	<i>Milligan</i> Stipulated Facts for PI Proceedings	ECF No. 56-3	Not stipulated for purposes of trial on the merits
<i>Additional Exhibits</i>			
127	Allen Long SBOE District 7 Ad—"Protect Our Schools"		Hearsay, Authenticity

Exhibit Number	Exhibit Description	Document Identification	Objections
128	Steve Marshall 2022 AG Campaign Ad— “Good Golfer. Bad Politician.”		Hearsay, Authenticity
129	Shomari Figures Attack Flyer— “Supports Releasing Dangerous Criminals onto Alabama Streets”		Hearsay, Authenticity
130	Senator Turberville interview, Dale Jackson Show, “Obama lookalike”		Hearsay, Authenticity
131	Eric Bradner, <i>Kayla Moore: ‘One of our attorneys is a Jew’</i> , CNN (Dec. 12, 2027)	RFA No. 46	Hearsay, Authenticity
132	Kay Ivey 2018 Governor Campaign Ad— “Monuments”	RFA Nos. 47, 48	Hearsay, Authenticity
133	Bradley Byrne 2020 U.S. Senate Campaign Ad— “Dale”	RFA No. 52	Hearsay, Authenticity
134	Chris Pringle 2020 U.S. Congress Campaign Ad— “Your Fault”	RFA No. 58	Hearsay, Authenticity
135	Alabama 2nd Congressional District candidate forum, Fox10 News (Feb. 25, 2024)	RFA No. 62	Hearsay, Authenticity

Exhibit Number	Exhibit Description	Document Identification	Objections
<i>Remaining Preliminary Injunction Hearing Exhibits</i>			
136	Expert Report of Maxwell Palmer filed in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 113-79	PI Hearing Exhibit 83	Undisclosed expert testimony
137	December 9, 2021 Deposition of Randy Hinaman	PI Hearing Exhibit 88	Improper deposition designations
138	December 17, 2021 Deposition of Chris Pringle	PI Hearing Exhibit 89	Improper deposition designations
139	December 17, 2021 Deposition of Jim McClendon	PI Hearing Exhibit 90	Improper deposition designations
140	Carol Robinson, Black Protestor Attacked at Donald Trump Rally Called ‘Monkey’ and Other Racial Slurs, He Says, AL.com (Nov. 21, 2015)	PI Hearing Exhibit 91	Hearsay, Authenticity
141	<i>Alabama Lawmaker Who Honored Klan Leader says He’s Surprised by Criticism</i> , WSFA (July 27, 2020)	PI Hearing Exhibit 92	Hearsay, Authenticity
142	Nick Patterson, <i>Coronavirus Rates in Alabama Hit Blacks the Hardest – and Experts Are Not Surprised</i> , BirminghamWatch (Apr. 20, 2020)	PI Hearing Exhibit 93	Hearsay, Authenticity

Exhibit Number	Exhibit Description	Document Identification	Objections
143	Safiya Charles, <i>Alabama Data Shows Majority of Coronavirus Deaths are African American</i> , Montgomery Advertiser (Apr. 9, 2020)	PI Hearing Exhibit 95	Hearsay, Authenticity
144	Shapiro & Farah Eltohamy, <i>Alabama Official on Vaccine Rollout: ‘How Can This Disparity Exist in This Country?’</i> , NPR (Mar. 11, 2021)	PI Hearing Exhibit 96	Hearsay, Authenticity
145	Sean McMinn et al., <i>Across the South, COVID-19 Vaccine Sites Missing from Black and Hispanic Neighborhoods</i> , NPR (Feb. 5, 2021)	PI Hearing Exhibit 97	Hearsay, Authenticity
146	Brian Lyman, <i>Racial Profiling Bill Dies on Final Day of Alabama Legislative Session</i> , Montgomery Advertiser (Mar. 29, 2018)	PI Hearing Exhibit 98	Hearsay, Authenticity
147	Azavea, <i>Redrawing the Map on Redistricting: 2012 Addendum</i>	PI Hearing Exhibit 99	Hearsay, Authenticity
148	Video: Alabama Supreme Court Justice Tom Parker 2018 Campaign Ad—“Invasion”	PI Hearing Exhibit 100	Hearsay, Authenticity

Exhibit Number	Exhibit Description	Document Identification	Objections
149	Video: Alabama Supreme Court Justice Tom Parker 2018 Campaign Ad—“Mob Rule”	PI Hearing Exhibit 101	Hearsay, Authenticity
150	Video: LA Times Releases Audio of Roy Moore’s Offhand Comment on Slavery	PI Hearing Exhibit 102	Hearsay, Authenticity
151	Video: Roy Moore: “New Rights in 1965, and Today We’ve Got a Problem”	PI Hearing Exhibit 103	Hearsay, Authenticity
152	Alabama Voter Registration Form	PI Hearing Exhibit 104; ECF No. 84-1	
153	Department of Justice Census Data Guidelines	PI Hearing Exhibit 105	
154	Evenwel Brief	PI Hearing Exhibit 106	Relevance, Hearsay

SINGLETON PLAINTIFFS’ EXHIBIT LIST

Ex. No.	Description	
S1.	Deposition of Randy Hinaman taken December 9, 2021	Improper deposition designations
S2.	Deposition of Chris Pringle taken December 17, 2021	Improper deposition designations
S3.	Deposition of Jim McClendon taken December 17, 2021	Improper deposition designations
S4.	Alabama State House Hearing Transcript	

S5.	Redistricting Guidelines	
S6.	All Alabama Congressional Maps	
S7.	Enacted 2021 Plan Map (Letter Size)	
S8.	Enacted 2021 Plan Population Summary	
S9.	Enacted 2021 Plan Population Summary (AP)	
S10.	Enacted 2021 Plan Population Summary (VAP)	
S11.	Enacted 2021 Plan District Statistics	
S12.	Enacted 2021 Plan Communities of Interest Splits	
S13.	Secretary of State Merrill's Pre-Trial Brief, Chestnut v. Merrill	
S14.	2023 Plan Maps and Demographics	
S15.	Caster/Milligan Letter to Legislative Committee on Reapportionment and Dorman Walker dated June 26, 2023	Hearsay, Relevance
S16.	Caster/Milligan Letter to Dorman Walker dated July 11, 2023	Hearsay, Relevance
S17.	Jim Blacksher Letter to Dorman Walker dated July 12, 2023	Hearsay, Relevance
S18.	Steve Marshall Letter to Dorman Walker dated July 13, 2023	
S19.	Caster/Milligan Letter to Dorman Walker dated July 17, 2023	Hearsay, Relevance

S20.	Summary of Prior Election Results Submitted by Senator Smitherman at the Special Session	Hearsay, Relevance, Authenticity
S21.	Andrews Voter Registration Information from Secretary of State	
S22.	Singleton Voter Registration Information from Secretary of State	
S23.	Slay Voter Registration Information from Secretary of State	
S24.	Smitherman Voter Registration Information from Secretary of State	
S25.	Walker Voter Registration Information from Secretary of State	
S26.	Defendants' Responses and Objections to <i>Singleton</i> Plaintiffs' First Requests for Admissions	
S27.	Deposition of Leonette Slay taken August 10, 2023	Hearsay, Improper deposition designations
S28.	Defendant Secretary of State Allen's Objections and Responses to <i>Singleton</i> Plaintiffs' Third Set of Requests for Admission	
S29.	Defendant Secretary of State Allen's Answers to <i>Singleton</i> Plaintiffs' Second Set of Interrogatories	
S30.	Defendant Secretary of State Allen's Answer to <i>Singleton</i> Plaintiffs' First Set of Requests for Production of Documents	
S31.	Kari Frederickson Expert Report	
S32.	Kari Frederickson Supplemental Report	
S33.	Volney Riser Expert Report	

S34.	Deposition of Kari Frederickson taken August 29, 2024	Hearsay, Improper deposition designations
S35.	Deposition of Volney Riser taken August 14, 2024	Hearsay, Improper deposition designations
S36.	Deposition of Bobby Singleton taken on July 29, 2024	Hearsay, Improper deposition designations
S37.	Deposition of Andrew Walker taken on July 11, 2024	Hearsay, Improper deposition designations
S38.	Deposition of Rodger Smitherman taken on July 29, 2024	Hearsay, Improper deposition designations
S39.	Deposition of Daryl Andrews taken on July 11, 2024	Hearsay, Improper deposition designations
S40.	Deposition of Adam Carrington taken August 19, 2024	Hearsay, Improper deposition designations
S41.	Alabama GOP VR Mailer 07-2024	Hearsay, Relevance, Authenticity
S42.	Alabama Secretary of State accuses League of Women Voters of data mining - Alabama Reflector	Relevance
S43.	Letter to DOJ re Preclearance Submission of Al. Act. No. 2011-518 SOS002646 highlighted	Relevance
S44.	Black Belt, UA Edu 2022	Hearsay, Relevance
S45.	Sen. Livingston's Response to <i>Singleton</i> Plaintiffs' Third Set of Interrogatories	
S46.	Rep. Pringle's Response to <i>Singleton</i> Plaintiffs' Third Set of Interrogatories	
S47.	Chairs' Responses to <i>Singleton</i> Plaintiffs' Second Requests for Admission	
S48.	Secretary Allen Responses to <i>Singleton</i> Plaintiffs' Second Requests for Admission	
S49.	State Certification of 2024 General Election	

S50.	Deposition of Leonette Slay taken on July 16, 2024	Hearsay, Improper deposition designations
------	--	---

MILLIGAN PLAINTIFFS' EXHIBITS

Exhibit Number	Objections	Exhibit Description	Doc. Number	Date
MX1		First Expert Report of Joseph Bagley, Ph.D.	68-2	12/15/21
MX2		Second Expert Report of Joseph Bagley, Ph.D.	76-2	12/27/21
MX3		Third Expert Report of Joseph Bagley, Ph.D.	200-15	7/28/23
MX4		Fourth Expert Report of Joseph Bagley, Ph.D.	385-1	5/17/24
MX5		Fifth Expert Report of Joseph Bagley, Ph.D.	385-5	7/31/24
MX6		First Expert Report of Traci Burch, Ph.D.	385-2	5/17/24
MX7		Second Expert Report of Traci Burch, Ph.D.	385-6	7/31/24
MX8		First Expert Report of Moon Duchin, Ph.D.	68-5	12/10/21
MX9		Second Expert Report of Moon Duchin, Ph.D.	92-1	12/20/21
MX10		Third Expert Report of Moon Duchin, Ph.D.		9/11/23
MX11		Fourth Expert Report of Moon Duchin, Ph.D.	385-3	5/17/24
MX12		Fifth Expert Report of Moon Duchin, Ph.D.	385-7	7/31/24
MX13		First Expert Report of Baodong Liu, Ph.D.	68-1	12/15/21
MX14		Second Expert Report of Baodong Liu, Ph.D.	76-1	12/27/21
MX15		Third Expert Report of Baodong Liu, Ph.D.	200	7/28/23

MX16		Fourth Expert Report of Baodong Liu, Ph.D.	385-4	5/17/24
MX17		Fifth Expert Report of Baodong Liu, Ph.D.	385-8	7/31/24
MX18		First Expert Report of M.V. "Trey" Hood, Ph.D.	66-4	12/14/21
FIRST PRELIMINARY INJUNCTION HEARING				
MX19		2011 Alabama Congressional map	88-18	
MX20		2021 Alabama Congressional map	88-19	
MX21		Ala. HB 621 (May 2021)	88-21	
MX22		2011 Reapportionment Comm. Guidelines	88-22	
MX23		2021 Proposed Reapportionment Comm. Guidelines Comparison handout	89-5	
MX24		2021 Reapportionment Redistricting Guidelines	88-23	
MX25	Relevance	Talking Points of Likely Issues	88-24	2021
MX26	Relevance	2021 Proposed Ala. Senate Districts Functionality Examination	88-25	
MX27		Congressional Plans Introduced in 2021 special session	88-29	
MX28		Memorandum Agreement between the U.S. Dep't of Transportation and the Alabama Law Enforcement Agency		
SECOND PRELIMINARY INJUNCTION HEARING				
MX29		Population Summary, "Livingston Congressional Plan 3," Alabama Permanent Reapportionment Committee (July 20, 2023)	200-1	
MX30		2023 Alabama Enacted Plan Performance Analysis	200-3	

MX31		Text of Senate Bill 5 (2023)	200-4	
MX32	Hearsay	Jeff Poor, State Rep. Pringle: Proposal to create second Democrat congressional district could help GOP — ‘I call it the Republican opportunity plan’, YELLOWHAMMER NEWS (Oct. 31, 2021)	200-5	
MX33		Press Release, Permanent Legis. Comm. on Reapportionment (June 21, 2023)	200-6	
MX34	Hearsay, relevance	<i>Milligan</i> and <i>Caster</i> Plaintiffs’ letter to Reapportionment Committee (June 26, 2023)	200-7	
MX35	Hearsay, relevance	<i>Milligan</i> and <i>Caster</i> Plaintiffs’ letter to Dorman Walker (July 11, 2023)	200-8	
MX36	Hearsay	Mike Cason, GOP lawmakers pass Alabama congressional map; Democrats say it defies Supreme Court, AL.com (July 22, 2023)	200-10	
MX37	Hearsay	Zach Montellaro, Alabama’s redistricting brawl rehashes bitter fight over voting rights, POLITICO (July 21, 2023)	200-11	
MX38	Hearsay	Assoc. Press, The fight over Alabama’s congressional redistricting now shifts back to federal court, ALA. DAILY NEWS (July 24, 2023)	200-12	
MX39	Hearsay	Rep. Terri Sewell: Alabama ‘Shamelessly’ Ignores U.S. Supreme Court, BIRMINGHAM TIMES (July 22, 2023)	200-13	
MX40	Hearsay	Jeff Poor, State Rep. Simpson on redistricting: ‘It would not surprise me if we have seven Republican congressmen’ after	200-14	

		2024 election, 1819 NEWS (July 16, 2023)		
MX41		2021 Reapportionment Committee Redistricting Guidelines (Readopted in 2023)	238-8	
MX42		Dr. M.V. Hood's performance analysis of Community of Interest Plan	238-1	
MX43		Community of Interest Plan Map	238-4	
MX44		Community of Interest Plan Population Summary	238-7	
MX45		Russell Split Map	238-9	
MX46		Expanded Black Belt Plan Map	238-10	
MX47		Whole Jefferson County Plan Map	238-11	
MX48		Livingston 1 Plan Map	238-5	
MX49		Livingston 2 Plan Map	238-6	
MX50		Opportunity Plan Population Summary (RC049515)	238-20	
MX51		Email (RC049603-04)	238-12	
MX52	Hearsay	Caleb Talor. House, Senate committees narrow redistricting plans down to two 1819 NEWS (July 18, 2023)	238-14	
MX53	Hearsay	Alexander Rocha et al., Alabama Legislature passes controversial congressional map, ALABAMA REFLECTOR (July 21, 2023)	238-15	
MX54		Talking point (RC049608-16)	238-16	
MX55		Proposed amendment to reapportionment committee guidelines (RC049228)	238-17	

MX56		July 12, 2023 Reapportionment Committee Agenda (RC049228)	238-18	
MX57	Hearsay	James Stephenson, et al., Alabama House, Senate Approve Separate Congressional Maps, BIRMINGHAM WATCH (July 20, 2023)	238-19	
MX58		Talking points (RC049571-72)	238-21	
MX59		Talking points (RC049573-76)	238-22	
MX60		Talking points (RC049577-80)	238-23	
Additional Exhibits				
MX60	Relevance, Attorney work product, deliberative process privilege	Draft Alabama Attorney General Preclearance Letter re: Alabama Act No. 2011-518 (SOS527)		9/27/11
MX61	Hearsay	George Talbot, "Alabama Republicans target Democrats in Machiavellian state legislature plot," Alabama Media Group (SOS796)		6/20/11
MX62		Alabama Number Unemployed and Employment Rate April 2024 Preliminary Report (SOS155959)		4/01/24
MX63	Hearsay, Relevance	Text messages between Sen. Livingston and Chris Brown (Red States Strategies)		6/11/23
MX64	Hearsay	John Sharp, "'Racial dog whistle,' Fearmongering': Mailers inflame Alabama congressional race," Alabama Media Group (MIL001009)		10/31/24

MX65	Hearsay, Relevance, Authenticity	Rep. Pringle, Audio File of "Midday Mobile Interview" with Apryl Marie Fogel (MIL001007)		11/20/24
MX66	Hearsay	Caleb Taylor, "House Pro-tem Pringle: Federal Court Redrew Second Congressional District `almost exclusively along racial lines,'" 1819 News (MIL001000)		11/21/24
MX67		Memorandum of Understanding between the United States Department of Justice, and the State of Alabama, the Alabama Secretary of State, and the Alabama Law Enforcement Agency re: National Voter Registration Act		11/12/15
MX68	Relevance, failure to disclose	Settlement Agreement between Alabama NAACP and Alabama Medicaid Agency		12/9/13
MX69	Relevance, failure to disclose	Settlement Agreement between Alabama NAACP and Alabama Department of Human Resources		12/9/13
MX70	Hearsay, Authenticity	Letter from EPA to Lance LeFleur, Dir. Ala. Dept. Env't Mgmt., Oct. 3, 2023		
MX71		Transcript of Reapportionment Committee Hearing, October 26, 2021		10/26/21
MX72		Transcript of Reapportionment Committee Hearings on June 27, 2023		6/29/23
MX73		Transcript of Reapportionment Committee Hearings on July 13, 2023		7/13/23
MX74	Hearsay, Relevance	Alabama House Judiciary Committee, The Impeachment Investigation of Governor Robert Bentley		4/25/17

MX75		Alabama Career Center System Area Supervisors (SOS155584)		
MX76		Alabama Career Center July 1, 2024 (SOS161534-SOS161538)		
MX77		Alabama Department of Labor (Turner depo Exhibit)		
MX78		ADOL Labor Market Info. (Turner depo Exhibit)		
MX79		The Five-Year Action Plan (SOS157206)		
MX80		State of the Workforce Report XVII (Nix depo. Exhibit)		
MX81		Mobile County Profile, Alabama Department of Labor (Nix depo. Exhibit)		
MX82		Dr. Bonneau backup data – congress 2022		
MX83		Dr. Bonneau backup data – AL state house 20002022		
MX84		Dr. Bonneau backup data – AL state senate 20002022		
MX85		Dr. Bonneau expert report – Table 2 – reconfigured (admitted as PX 333 in NAACP v. Allen f/k/a/ Stone v. Allen)		
MX86		2022 Census of Agriculture County Data for Alabama (Schmitz depo. Exhibit)		
MX87	Hearsay	March 7, 2024 WSFA News Article, “Rep. Barry Moore beats incumbent to win 1st Congressional Dist. Republican primary” (Schmitz depo. Exhibit)		3/7/24
MX88		SmartBank Regional Leadership Website Page (Williams depo. Exhibit)		
MX89	Hearsay	“The COVID Tracking Project, Alabama: All Race & Ethnicity Data,” The Atlantic		

MX90		Alabama Sec’y of State, Tbl. “2020 General Election Participation by Race”		2020
MX91		U.S. Census Bureau, “Voting and Registration in the Election of November 2020,” Table 4b		2020
MX92		Alabama Department of Education, “Report Card,” (Reporting Year 2022-23)		2023
MX93	Hearsay, Relevance	Press Release, U.S. DOJ, “Justice Department Secures Resolution in Madison County, Alabama, School Desegregation Case”		03/07/21
MX94	Hearsay	Nat’l Conf. of State Legislatures, “Tbl. 2: Excuses to Vote Absentee” (updated Jan. 3, 2024)		2020
MX95		Ala. Dep’t of Health, “Infant Mortality Alabama 2022”		2022
MX96		Ala. Sec’y of State, “Crimes Involving Moral Turpitude Include”		2022-23
MX97		Ala. Sec’y of State, “Convicted of a Felony? You May Still Be Able to Vote”		07/06/22
MX98		U.S. DOJ “Prisoners in 2021 - Statistical Tables”		2021
MX99		U.S. DOJ “Probation and Parole in the United States, 2021”		2022
MX100	Hearsay	Catherine O. Johnson, et al., “Life expectancy for White, Black, and Hispanic race/ethnicity in U.S. states: trends and disparities, 1990 to 2019,” <i>Annals of Internal Medicine</i> , pp. 1057-1064 (Supplemental Tables)		
MX101	Hearsay	Christopher Uggen, Ryan Larson, Sarah Shannon, and Robert Stewart “Locked Out 2022: Estimates of People Denied		2022

		Voting Rights Due to a Felony Conviction,” Sentencing Project		
MX102	Hearsay	Keith M. Chen, Kareem Haggag, Devin G. Pope, and Ryne Rohla, “Racial disparities in voting wait times: Evidence from smartphone data,” Review of Economics and Statistics, pp. 1341-135 (Supplemental Appendix Figure B.2)		2021
MX103	Hearsay	Gallup, “Race Relations” Poll		2021
MX104	Hearsay	Qui & Hannah-Jones “A National Survey of School Desegregation Orders,” Pro Publica		2022
MX105		U.S. Census Bureau. “2021 Public Elementary- Secondary Education Finance Data,” Summary Tbl. 8		2022
MX106		Ala. State Dep’t of Ed., “School System Per-Pupil Expenditures FY 2022”		2022
MX107	Hearsay	Katsinas et al., “Internet Disparities in Alabama & the Black Belt”		
MX108	Hearsay	O'Brien et al., “K-12 STEM Education in Alabama’s Black Belt”		12/23/14
MX109	Hearsay	EEOC, “FY 2009-2022 EEOC Charge Receipts for AL”		2022
MX110	Hearsay	EEOC, “Race-Based Charges (charges filed with EEOC FY 1997-FY2023)”		2023
MX111		Alabama Department of Corrections, “Fiscal Year 2023 Annual Legislative Report”		

MX112		FBI, Crime Data Explorer, Table of “Alabama Overall Arrest Data by Race for 2022”		2022
MX113		Alabama Department of Corrections, Monthly Statistical Report for September 2021		2021
MX114	Hearsay	Collection of Civil Rights Division Section 5 Objection Letters to State of Alabama from 1965 to 2013.		
MX115	Hearsay, failure to disclose	Alabama Advisory Committee, “Barriers to Voting in Alabama: A Report by the Alabama Advisory Committee to the United States Commission on Civil Rights,” U.S. Commission on Civil Rights		2023
MX116	Hearsay, Relevance	Consent Order, <i>Bennett v. Madison County Board of Education</i> , No. 5:63-CV-613-MHH		2022
MX117	Hearsay	Josh Moon, “Former Athens superintendent, two others sentenced in virtual school case,” Alabama Political Reporter		2021
MX118	Hearsay	U.S. DOJ, Office of Public Affairs, “Department of Justice and Health and Human Services Announce Interim Resolution Agreement in Environmental Justice Investigation of Alabama Dep’t of Public Health”		
MX119	Hearsay, relevance	Voluntary Compliance Agreement between Housing Authority of the City of Decatur and the U.S. Dep’t of Housing and Urban Development		2020
MX120	Hearsay	Shiva Kooragayala, “The problem with talking about “inner cities,” Urban Institute		07/08/22

MX121	Hearsay	Caleb Ecarma, "Tommy Tuberville has taken Another Breathtakingly Bad Stance on Diversity," Vanity Fair		07/22/22
MX122	Hearsay	Chris Massie, "Rep. Brooks: Dems' 'war on whites' behind some criticism of Sessions," CNN		
MX123	Hearsay	Leada Gore, "Rep. Mo Brooks: People who live 'good lives' should pay less for health insurance," al.com		
MX124	Hearsay	Sam Levine, "GOP Congressman Accuses Democrats of Waging A 'War on Whites'," Huffington Post		
MX125	Hearsay, Authenticity, Relevance	"The Prattville Dragoons Blog," Blogspot.com		
MX126	Hearsay	Paul Gattis, "Alabama Democrats call on GOP lawmaker to resign over Confederate support," al.com		06/20/20
MX127	Hearsay	Brent Wilson, "Alabama Democratic Party Seeks Resignation of 'Confederate Apologist'," bamapolitics.com		06/19/20
MX128	Hearsay	Charles J. Dean, "Sen. Scott Beason catching flak over 'empty the clip' comment" al.com		02/07/11
MX129	Hearsay	Kim Chandler, "Sen. Scott Beason apologizes for comments revealed during bingo trial (video)" al.com		09/27/11
MX130	Hearsay	Philip Bump, "Roy Moore: America was great in era of slavery, is now 'focus of evil in the world,'" Washington Post		12/08/17

MX131	Hearsay	“Race in Our Politics: A Catalog of Campaign Materials,” (Print outs of Dec. 10, 2017, advertising materials)		12/10/17
MX132	Hearsay	“Ads for Democrat Doug Jones running for US Senate in Alabama against alleged child abuser Roy Moore”		
MX133	Hearsay	Kyle Whitmire, “The John Merrill Show is on again. Somebody changed the channel,” al.com		04/22/20
MX134	Hearsay	Tierney Sneed, “AL Elections Chief taunts twitter Users Noting Hurdles in Absentee Voting Requirements,” TalkingPointsMemo.com		04/21/20
MX135	Hearsay	Mike Cason “Gov. Robert Bentley’s task force recommends Medicaid expansion” al.com		11/18/15
MX135	Hearsay	Mike Cason “Gov. Robert Bentley’s task force recommends Medicaid expansion” al.com		11/18/15
MX136	Hearsay	Anthony Daniels & Bobbly Singleton “Coronavirus crisis begs for Alabama Medicaid expansion” Alabama Political Reporter		04/17/20
MX137	Hearsay	Office of Congresswoman Sewell, “Rep. Sewell Introduces COVER Now Act to Empower Local Governments to Overcome Obstruction to Medicaid Expansion” Press Release		07/17/21
MX138	Hearsay	Michelle Boorstein, “The Stunning Difference between White and Black Evangelicals in Alabama” Washington Post		12/13/17

MX139	Hearsay	Robert Petterson, "Address at the Annual Leadership Conference of the Citizens' Councils of America, Montgomery, Alabama," Selma Times-Journal		02/16/65
MX140	Hearsay, Relevance	The Martin Luther King, Jr. Research and Education Institute, "Communism," Stanford University		04/04/18
MX141	Hearsay	Brent Wilson, "Chris Pringle: White Straight Southern Christian Conservatives Under Attack" Bama Politics		02/18/20
MX142	Hearsay	Kyra Miles "Echoes of the Past as Overwhelmingly White Mountain Brook Debates Diversity," Birmingham Watch		08/07/21
MX143	Hearsay	Pew Research Center, "Views about abortion among blacks by state"		
MX144	Hearsay	Jeremy Gray, "Historian Wayne Flynt on Senate race, Confederate monuments, Alabama's 'political prostitution,'" al.com		08/20/17
MX145	Hearsay	Sue Bell Cobb, "I was Alabama's Top Judge. I'm Ashamed by what I had to do to Get There" politico.com		03/31/15
MX146	Hearsay	Aubrey W. Jewett, "Partisan Change in Southern Legislatures, 1946-95,"		2001
MX147	Hearsay	"Supreme Court Voting Rights Decision Was a Missed Opportunity," Washington Examiner		
MX148	Hearsay	M.V. Hood IV, Peter A. Morrison, and Thomas M. Bryan,		2017

		“From Legal Theory to Practical Application: A How-To for Performing Vote Dilution Analyses,” Social Science Quarterly 99 (2): pp. 536-552		
MX149	Hearsay	The Election of African American State Legislators in the Modern South		
MX150	Hearsay	From Legal Theory to Practical Application		
MX151	Hearsay	Proposed Alabama Senate District 18 Functionality Examination		
MX152	Hearsay	Wash. Post Police Shootings database		04/29/24
MX153	Hearsay	U.S. DOJ, “Notice Letter and Report Regarding Investigation of Alabama’s State Prisons for Men”		04/02/19
MX154	Hearsay	Gallup: Race Relations		
MX155	Hearsay	Pew Research Center, “Party affiliation among whites by state”		
MX156	Hearsay	Bylaws for Units of the NAACP		
MX157	Hearsay	NPR, “In Alabama, racial disparities in health outcomes predate the pandemic”		07/04/20
MX158	Hearsay	Rocha, “Report: Alabama has poor health system performance, stark health care disparities,” Ala. Reflector		
MX159	Hearsay	Alabama Appendix to David C. Radley et al., “Advancing Racial Equity in U.S. Health Care: The Commonwealth Fund 2024 State Health Disparities Report”		04/01/24
MX160	Hearsay	Sean Dowling, “Alabama doctors urging Black women to		05/23/24

		participate in landmark study on cancer amid low survival rates," WAFF48		
MX165		Alabama Dep't Public Health, Office of Health Equity and Minority Health, "What is Health Equity?"		
MX167	Hearsay	Assoc. Press, "AP focuses on Alabama patient in its series on alleged medical racism in the U.S."		05/23/
MX168		"Alabama Maternal Mortality Review 2020 Annual Report.," Alabama Department of Public Health, Bureau of Family Health Services.		2020
MX169	Hearsay	Debbie Elliott, "Black residents in rural Alabama demand sanitation equity, saying 'it's a right'," NPR		10/13 23
MX170	Hearsay	Interim Resolution Agreement between US DOJ, US HHS, and ADPH re: Lowndes County Wastewater Disposal		05/03/23
MX171	Hearsay	Jefferson County Board of Public Health, Board of Health Resolution, "Race as a Public Health Problem"		02/20/21
MX172		"Fiscal year 2014 Annual Driver's License Production Costs"		
MX173		List of DL Offices closed		
MX174	Relevance, Failure to Disclose	Cedric Coley, "Jobs, Not Mobs", Instagram Post		8/22/24
Discovery Responses				
MX175		Legislative Defendants' Response to First Set Interrogatories		
MX178		Defendant Secretary of State's Response to First Set Interrogatories		

MX179		Defendants' Response to Second Set Interrogatories		
MX180		Defendant Sen. Livingston's Responses to Plaintiffs' Third Set of Interrogatories (Aug. 9, 2023)	238-2	
MX181		Defendant Rep. Pringle's Response to Plaintiffs' Third Set of Interrogatories (Aug. 9, 2023)	238-3	
MX182		Defendant Secretary Allen Response to Request for Admissions		
MX183		Defendants Pringle and Livingston Responses to Requests for Admissions		
MX184		Red State Strategies Response to Plaintiffs' Interrogatories and Requests for Production of Documents		
MX185		Defendants Pringle and Livingston Responses to Requests Nos. 1 – 5 for Production of Documents		
MX186		Defendant Secretary Allen Response to Request for Requests No. 1 – 5 for Production of Documents		
MX187	Hearsay, Improper deposition designations	Chris Brown, Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		
MX189	Hearsay	Emails between legislators and Chris Brown		
MX190	Improper deposition designations	Randy Hinaman, First Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		
MX191	Improper deposition designations	Randy Hinaman, Second Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		

MX192	Relevance, Improper deposition designations	Randy Hinaman, Deposition Transcript in <i>Stone v. Allen</i> and exhibits		
MX193	Improper deposition designations	Sen. Livingston, Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		
MX194	Improper deposition designations	Rep. Pringle, First Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		
MX195	Improper deposition designations	Rep. Pringle, Second Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		
MX196	Improper deposition designations	Spencer Collier, Deposition Transcript, <i>Greater Birmingham Ministries v. Alabama</i> ,		
MX197	Improper deposition designations	Sen. McClendon's Deposition Transcript in <i>Milligan v. Allen</i> and exhibits		
MX198	Improper deposition designations	Sen. McClendon's Deposition Transcript in <i>Stone v. Allen</i> and exhibits		
MX199	Hearsay, Relevance	Sen. Beason, Trial Transcripts, <i>U.S. v. McGregor</i> , No. 2:10-cr-186		

Respectfully submitted,

Steve Marshall
Attorney General

s/ James W. Davis
Edmund G. LaCour Jr. (ASB-9182-U81L)
Solicitor General
Soren Geiger (ASB-0336-T31L)
Assistant Solicitor General
James W. Davis (ASB-4063-I58J)
Deputy Attorney General

Richard D. Mink (ASB-4802-M76R)
Misty S. Fairbanks Messick (ASB-1813-T71F)
Brenton M. Smith (ASB-1656-X27Q)
Benjamin M. Seiss (ASB-2110-O00W)
Charles A. 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

Edmund.LaCour@AlabamaAG.gov

Soren.Geiger@AlabamaAG.gov

Jim.Davis@AlabamaAG.gov

Richard.Mink@AlabamaAG.gov

Misty.Messick@AlabamaAG.gov

Brenton.Smith@AlabamaAG.gov

Ben.Seiss@AlabamaAG.gov

Charles.McKay@AlabamaAG.gov

Counsel for Secretary of State Allen

s/Michael P. Taunton

J. Dorman Walker (ASB-9154-R81J)

BALCH & BINGHAM LLP

Post Office Box 78 (36101)

445 Dexter Avenue, Suite 8000

Montgomery, Alabama 36104

Telephone: (334) 269-3138

DWalker@Balch.com

Michael P. Taunton (ASB-6833-H00S)

Riley Kate Lancaster (ASB-1002-X86W)

BALCH & BINGHAM LLP

1901 Sixth Avenue North, Suite 1500

Birmingham, Alabama 35203

Telephone: (205) 251-8100

MTaunton@Balch.com

RLancaster@Balch.com

**Counsel for Sen. Livingston & Rep.
Pringle**

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2024, I filed the foregoing using the Court's CM/ECF system, which will serve all counsel of record.

/s/ James W. Davis
Counsel for Secretary Allen