

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

BOBBY SINGLETON, *et al.*,

Plaintiffs,

v.

WES ALLEN, *et al.*,

Defendants.

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

THREE-JUDGE COURT

EVAN MILLIGAN, *et al.*,

Plaintiffs,

v.

WES ALLEN, *et al.*,

Defendants.

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

THREE-JUDGE COURT

MARCUS CASTER, *et al.*,

Plaintiffs,

v.

WES ALLEN, *et al.*,

Defendants.

Case No.: 2:21-cv-1536-AMM

**PLAINTIFFS' UNOPPOSED MOTION
TO DEFER MOTIONS FOR ATTORNEYS' FEES**

The *Singleton*, *Milligan*, and *Caster* Plaintiffs request the Court to order any motions for attorney's fees to be filed 60 days after, if appealed, the entry of the mandate after the ruling on appeal (assuming the ruling is not a remand for further proceedings), or after the conclusion of remedial proceedings, whichever is later, or (2) otherwise as the Court orders the parties to file motions for attorneys' fees.

1. On May 8, 2025, the Court granted Plaintiffs' motions for a permanent injunction barring Secretary Allen from conducting elections with the 2023 Plan. *Singleton* Doc. 324 at 16 of 571; *Milligan* Doc. 490 at 16 of 571; *Caster* Doc. 401 at 26 of 581. The Court has not yet scheduled remedial proceedings.

2. To facilitate the timely scheduling of remedial proceedings, the Court set a status conference for all parties on Wednesday, May 28, 2025, at 12:00 p.m. Central Daylight Time. *Singleton* Doc. 324 at 16 of 571; *Milligan* Doc. 490 at 16 of 571; *Caster* Doc. 401 at 26 of 581.

3. Plaintiffs intend to file motions seeking awards of attorneys' fees pursuant to 42 U.S.C. § 1988. While § 1988 imposes no time limit for requesting fees, requests must be "made within a reasonable period of time." *Clark v. Hous. Auth. of City. of Alma*, 971 F.2d 723, 724 (11th Cir. 1992).

4. To defer briefing on attorney's fees until the conclusion of remedial proceedings and any appeal, or such other time the Court rules is appropriate, would promote judicial efficiency and economy.

5. When appropriate, Plaintiffs and Defendants expect to confer on an appropriate briefing schedule for fees and submit a proposal to the Court.

6. On May 16, 2025, Plaintiffs' counsel conferred with Defendants' counsel; Defendants do not oppose this motion.

7. Nothing in this motion waives any party's arguments regarding Plaintiffs' entitlement to fees or the amount of fees. This motion simply seeks to confirm, out of an abundance of caution, that fees motions filed after the remedial phase and any appeal will not be time-barred.

WHEREFORE, the *Singleton, Milligan, and Caster* Plaintiffs request the Court to order any motions for attorney's fees to be filed 60 days after, if appealed, the ruling on appeal and the entry of the mandate (assuming the ruling is not a remand for further proceedings), or after the conclusion of remedial proceedings, whichever is later, or (2) otherwise as the Court may order the parties to file motions for attorneys' fees.

/s/ Deuel Ross

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CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2025, a copy of the foregoing has been served on all counsel of record through the Court's CF/ECF system.

/s/ J.S. "Chris" Christie

J.S. "Chris" Christie
One of the Attorneys for the *Singleton* Plaintiffs