

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

KHADIDAH STONE¹, *et al.*,

Plaintiffs,

v.

WES ALLEN, *et al.*,

Defendants.

No. 2:21-cv-1531-AMM

JOINT STATUS REPORT

In response to the Court's Order to file a Joint Status Report on or before May 3, 2024 (Doc. 148), and its instructions in its original Scheduling Order (Doc. 84 at 7), the Parties respectfully submit the following update.

Plaintiffs filed their Fourth Amended Complaint in December 2023, challenging Alabama's State Senate districts in the Montgomery and Huntsville under Section 2 of the Voting Rights Act. The parties are actively engaged in discovery, as further discussed below. Summary judgment motions are due June 21, 2024, and *Daubert* motions are due October 4, 2024. No motions are currently pending. Trial is set to begin November 12, 2024.

¹ Laquisha (Que) Chandler was dropped from the Fourth Amended Complaint. (Doc. 126).

The Parties agree that, given the nature of the case, mediation will not be productive. Thus, they would respectfully decline any invitation to mediate.

The Parties have worked collaboratively to conduct a significant amount of discovery, including the exchange of all forms of written discovery from both sides, the exchange of expert reports of ten expert witnesses, and the depositions of five parties or fact witnesses and four expert witnesses. One more party and six more experts are scheduled to be deposed next week. Discovery is scheduled to close next Friday, May 10, 2024. At the present time, the Parties do not have any pending or anticipated discovery disputes and do not anticipate any issues arising that would prevent them from proceeding to trial as scheduled.

That said, in the last month, both the Plaintiffs and Defendants have disclosed additional fact witnesses. Given the current number of depositions scheduled in the remaining days of discovery, the Parties are considering whether it may be necessary to request an additional two or three weeks to complete those remaining depositions. If that is indeed the case, the Parties will promptly seek leave from the Court to do so. The Parties do not believe that an additional two or three weeks for depositions will interfere with the summary judgment deadline, the *Daubert* motion deadline, or the trial date.

The Court previously indicated that a Status Conference will be set for the week of May 10, 2024 by Zoom. (Doc. 148) Given the full deposition schedule

next week, the parties respectfully request that, should the Court believe a Status Conference is needed, it be set for the next week or thereafter.

DATED this 3rd day of May, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record.

This the 3rd day of May, 2024.

/s/ Davin Rosborough