

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

KHADIDAH STONE, *et al.*,

*Plaintiffs,*

vs.

REP. CHRIS PRINGLE, *et al.*,

*Defendants.*

Case No.: 2:21-cv-1531-AMM

**REP. CHRIS PRINGLE’S NOTICE OF EVIDENTIARY SUBMISSION  
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

In addition to the evidentiary submission already made by the Defendant Alabama Secretary of State, Wes Allen, (*see* Doc. 164), Defendant Rep. Chris Pringle submits the following exhibits in support of his motion for summary judgment.

<b><u>Exhibit</u></b>	<b><u>Document</u></b>
23	Declaration of Rep. Chris Pringle
24	Declaration of Sen. Steve Livingston
25	Rep. Chris Pringle’s Verified Objections and Responses to Plaintiffs’ First Interrogatories to Defendants
26	Plaintiffs’ Responses to Defendant Allen’s Discovery Requests
27	Greater Birmingham Ministries Supplemental Discovery Responses
28	Deposition Excerpts – Fed. R. Civ. P. 30(b)(6) Deposition of Alabama State Conference of the NAACP President, Bernard Simelton

<b><u>Exhibit</u></b>	<b><u>Document</u></b>
29	Deposition Excerpts – Fed. R. Civ. P. 30(b)(6) Deposition of Greater Birmingham Ministries Executive Director, Scott Douglas

Dated: June 21, 2024.

/s/ Dorman Walker  
Counsel for Rep. Chris Pringle

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify I electronically filed the foregoing notice with the clerk of the Court using the CM/ECF system on June 21, 2024, which will serve all counsel of record.

/s/ Dorman Walker  
OF COUNSEL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

**KHADIDAH STONE, *et al.*,**

*Plaintiffs,*

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

*Defendants.*

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 23**

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

KHADIDAH STONE, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	Case No. 2:21-cv-1531-AMM
	)	
WES ALLEN, in his official capacity	)	
as Secretary of State of Alabama, <i>et al.</i>	)	
	)	
<i>Defendants.</i>	)	

**DECLARATION OF REP. CHRIS PRINGLE**

1. My name is Chris Pringle. This declaration is based on my personal knowledge.
2. I represent Alabama House District 101 in the Alabama Legislature, where I also am the House Chair of the Legislature's Permanent Legislative Committee on Reapportionment (the "Reapportionment Committee").
3. Despite its name, the primary task of the Reapportionment Committee is redistricting.
4. The Reapportionment Committee is responsible for proposing new statewide redistricting plans for congressional, Alabama House of Representatives, Alabama Senate, and State Board of Education districts. Neither the Reapportionment Committee nor the House of Representatives

is required to accept such proposed plans, each of which can be amended, substituted, or rejected in favor another districting plan.

5. As the House Chair of the Reapportionment Committee, I take a leadership role in the development and design of proposed new districts for the House of Representatives.

6. As House Chair, I have no role in the development or design of Senate districts. My only involvement with passage of the Senate districts that became SB1 was in presenting them to the House of Representatives after they were passed by the Senate, and in voting on them as a member of the Legislature. In 2021, the House made no changes to the Senates districts after they were passed by the Senate.

7. I have reviewed the Prayer for Relief<sup>1</sup> in the Fourth Amended Complaint. I have no power to grant the relief requested, neither as House Chair of the Reapportionment Committee nor as a member of the Legislature.

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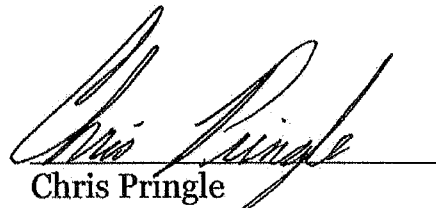
<sup>1</sup> "WHEREFORE, Plaintiffs respectfully request that the Court:

A. Declare the State Senate districting plan adopted in SB 1 a violation of Section 2 of the Voting Rights Act of 1965;  
B. Enjoin the Defendants and their agents from holding elections in the challenged districts adopted in SB 1 and any adjoining districts necessary to remedy the Voting Rights Act violations, 42 U.S.C. § 1983; 52 U.S.C. § 10302(b);  
C. Set a reasonable deadline for the State of Alabama to adopt and enact a districting plan for the State Senate that remedies the Voting Rights Act violations;  
D. Award Plaintiffs their costs, expenses, disbursements, and reasonable attorneys' fees incurred in bringing this action pursuant to and in accordance with 52 U.S.C. § 10310(e) and 42 U.S.C. § 1988(b);  
E. Retain jurisdiction over this matter until all Defendants have complied with all orders and mandates of this Court;  
F. Retain jurisdiction over this matter and require all Defendants to subject future State Senate redistricting plans for preclearance review from this court or the U.S. Attorney General under Section 3(c) of the VRA, 52 U.S.C. § 10302(c);  
G. Grant such other and further relief as the Court may deem just and proper." Doc. 126, Prayer for Relief.

8. Specifically, I cannot declare that SB 1 violates the Voting Rights Act; I have no authority to prevent the 2021 Senate districts from being used in elections; I have no authority to cause the adoption and enactment of a new redistricting plan for the Senate; I cannot exercise the Court's judicial power; and I cannot exercise or determine any preclearance requirements.

I declare under penalty of the perjury laws of the United States of America that the forgoing is true and correct.

Date: 12/20/23

  
Chris Pringle

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**KHADIDAH STONE, *et al.*,**

***Plaintiffs,***

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

***Defendants.***

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 24**





My only involvement in the development and design of the current Senate districts was voting on them as an individual member of the Legislature. Consequently, I know how my own district was drawn, but I have little information about how other Senate districts were drawn.

6. As the current Senate Chair of the Reapportionment Committee, I will have a leadership role in the development and design of any proposed new Senate districts. However, neither the Reapportionment Committee nor the Senate is required to accept any such proposed plan, which could be amended, substituted, or rejected in favor another districting plan.

7. I have reviewed the Prayer for Relief<sup>1</sup> in the Fourth Amended Complaint. I have no power to grant the relief requested, neither as Senate Chair of the Reapportionment Committee nor as a member of the Legislature.

8. Specifically, I cannot declare that SB1 violates the Voting Rights Act. I have no authority to prevent the 2021 Senate districts from being used in

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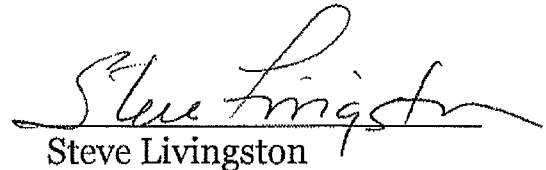
<sup>1</sup> "WHEREFORE, Plaintiffs respectfully request that the Court:

A. Declare the State Senate districting plan adopted in SB 1 a violation of Section 2 of the Voting Rights Act of 1965;  
B. Enjoin the Defendants and their agents from holding elections in the challenged districts adopted in SB 1 and any adjoining districts necessary to remedy the Voting Rights Act violations, 42 U.S.C. § 1983; 52 U.S.C. § 10302(b);  
C. Set a reasonable deadline for the State of Alabama to adopt and enact a districting plan for the State Senate that remedies the Voting Rights Act violations;  
D. Award Plaintiffs their costs, expenses, disbursements, and reasonable attorneys' fees incurred in bringing this action pursuant to and in accordance with 52 U.S.C. § 10310(e) and 42 U.S.C. § 1988(b);  
E. Retain jurisdiction over this matter until all Defendants have complied with all orders and mandates of this Court;  
F. Retain jurisdiction over this matter and require all Defendants to subject future State Senate redistricting plans for preclearance review from this court or the U.S. Attorney General under Section 3(c) of the VRA, 52 U.S.C. § 10302(c);  
G. Grant such other and further relief as the Court may deem just and proper." Doc. 126, Prayer for Relief.

elections. I have no authority to cause the adoption and enactment of a new Senate redistricting plan. I cannot exercise the Court's judicial power. And I cannot exercise of determine any preclearance requirements.

I declare under penalty of the perjury laws of the United States of America that the forgoing is true and correct.

Date: 12/19/23

  
Steve Livingston

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

**KHADIDAH STONE, *et al.*,**

*Plaintiffs,*

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

*Defendants.*

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 25**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

LAQUISHA CHANDLER, et al.,

Plaintiffs,

vs.

WES ALLEN, et al.,

Defendants.

Case No.: 2:21-cv-1531-AMM

**DEFENDANT REP. CHRIS PRINGLE'S  
OBJECTIONS AND RESPONSES TO  
"PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DEFENDANTS"**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendant Rep. Chris Pringle, the House Chair of the Alabama Legislature's Reapportionment Committee, hereby objects and responds to "Plaintiffs' First Set of Interrogatories to Defendants," which were served on July 21, 2023.

**General Statement**

In providing these responses, Rep. Pringle has relied on the information presently available to him as House Chair of the Reapportionment Committee. Further or different information may be revealed during the discovery phase of this litigation. Rep. Pringle will amend his Objections and Responses to the extent required by Fed. R. Civ. P. 26 and the applicable local Rules of this Court, applicable orders of the Court, and/or related agreements. Rep. Pringle reserves the right to revise, correct, supplement, clarify, and amend his Objections and Responses set forth herein consistent with the Federal Rules of Civil Procedure.

Rep. Pringle's answers to each and every request regarding any person's actions or intent in drafting or considering any districting map are subject to the understanding (and do not waive the arguments) that: whatever the purpose of any person involved in preparing or considering a map, "[t]he 'cat's paw' theory has no application to legislative bodies," *Brnovich v. Democratic Nat'l Comm.*, 141 S. Ct. 2321, 2350 (2021); "determining the intent of the legislature is a problematic and near-impossible challenge," *Greater Birmingham Ministries v. Sec'y of State for State of Alabama*, 992 F.3d 1299, 1324 (11th Cir. 2021); and "the good faith of a state legislature must be presumed," *Miller v. Johnson*, 515 U.S. 900, 915 (1995).

By answering these interrogatories without objection to whether any individual interrogatory is properly counted as more than one interrogatory, Rep. Pringle does not waive his right to object—in response to further interrogatories, if any—to Plaintiffs surpassing the limit on the number of interrogatories that may be served in this proceeding. Rep. Pringle specifically reserves his right to lodge such an objection.

□

**General Objections**

Rep. Pringle objects to the Definitions and Instructions to the extent that they purport to impose any requirements or obligations different from those contained in the applicable Federal Rules of Civil Procedure, the applicable local Rules of this Court, applicable orders of the Court, and/or related agreements. Rep. Pringle will respond to Plaintiffs' interrogatories in accordance with the Federal Rules of Civil Procedure, the applicable local Rules of this Court, applicable orders of the Court, and/or related agreements. Rep. Pringle understands and interprets Plaintiffs' interrogatories in accordance with standard usage of the English language.

Rep. Pringle objects to each of the requests for production to the extent it seeks information or documents protected by the attorney-client privilege, the joint defense doctrine/attorney-client privilege, common interest doctrine/attorney-

client privilege, the work-product doctrine, deliberative process privilege, law enforcement privilege, legislative privilege, or any other applicable privilege, exemption, or immunity. Rep. Pringle's response to each request is made subject to all objections as to privilege, competence, relevance, materiality, propriety, and admissibility, as well as any and all other objections and grounds that would require the exclusion of evidence. Rep. Pringle reserves the right to make any and all such objections at the appropriate time.

Rep. Pringle further specifically objects to the Definition of "You", "Your", or "Defendant" to the extent that it can be read to suggest that any individual fills the multiple roles listed. Rep. Pringle will read these terms to refer to himself in his official capacity as House Chair of the Reapportionment Committee, and his responses are based on the knowledge of his office.

Rep. Pringle objects to the interrogatories to the extent they are directed to matters which are not no longer relevant to the subject matter at issue in this action, or to the extent Plaintiffs seeks information that is neither admissible nor reasonably calculated to lead the discovery of admissible evidence. In particular, Plaintiffs have propounded several interrogatories that either directly seek information about the House of Representatives 2021 district map or that would otherwise cover the House of Representatives 2021 district map even though Plaintiffs' claims no longer include challenges to any House of Representatives districts. Rep. Pringle objects to these interrogatories as overbroad, outside the scope of permissible discovery, and not proportional to the discovery needs of this case. By responding to any such interrogatories, Rep. Pringle does not waive, and expressly reserves, all such objections.

Rep. Pringle objects to the interrogatories to the extent they seek information that is obtainable from publicly available sources or other sources that are equally available to both parties.

Rep. Pringle incorporates each of these General Objections into his specific objections to each interrogatory below, whether or not each such General Objection is expressly referred to in his objections to a specific interrogatory. Any response provided by Rep. Pringle to the interrogatories shall in no way constitute or be construed as a waiver of the objections contained herein.

Rep. Pringle objects to the interrogatories to the extent they seek information about Alabama Senate districts. Rep. Pringle did not draw, evaluate, or approve the current Senate districts in 2021. Rep. Pringle had no role in the adoption of previous Senate districts.

### Responses

**INTERROGATORY NO. 1: Identify all consultants, experts, or other individuals whose input, feedback, or advice you sought in drawing, evaluating, or approving Alabama's 2021 state legislative maps, including whether those maps complied with the Voting Rights Act, the U.S. Constitution, and federal and state law.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Without waiving these objections, Rep. Pringle states that he consulted the following individuals as part of his efforts as House Chair of the Joint Legislative Committee on Reapportionment (the "Committee") during the 2021 redistricting cycle:

Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal -- limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle did not draw, evaluate or approve the Senate districts. Rep. Pringle's response to this interrogatory does not purport to cover all

“consultants, experts, or other individuals whose input, feedback, or advice” might have been “sought in drawing, evaluating, or approving” any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs’ claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, as to the House districts, Rep. Pringle consulted with members of the House, Randy Hinaman, and counsel for the Reapportionment Committee. He may also have consulted with counsel from the Attorney General’s office.

**INTERROGATORY NO. 2: Identify the criteria that the Committee and/or its agents, including Randy Hinaman, used as redistricting guidelines in creating Alabama’s state legislative districts during the 2021 redistricting cycle, including the weight or priority applied to each factor.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about criteria that “the Committee and/or its agents” used as beyond his knowledge, and responds as to himself. In particular, Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of the Redistricting Committee. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle’s response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which are outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs’ claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle relied on and instructed Randy Hinaman to rely on the Reapportionment Committee Redistricting Guidelines (the “Guidelines”).

**INTERROGATORY NO. 3: Identify and describe all guidance and instructions that were provided to Randy Hinaman by you or your agents, employees, or anyone assisting you concerning the process he should employ when drawing the 2021 state legislative districts, the relevant criteria to consider, and what evaluations of his districts should be conducted.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle’s response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs’ claims do not challenge any House of Representatives districts, and therefore this information is



no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle instructed Randy Hinaman to rely on the Guidelines, and to consult with lawyers concerning case law, as needed. Rep. Pringle provided Randy Hinaman with no guidance or instruction concerning the state Senate district map.

**INTERROGATORY NO. 4: Describe the 2021 redistricting cycle drafting timeline for Alabama's state legislative districts, including identifying all meetings between Drafters and the Committee and/or its agents.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of the Redistricting Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle met with members of the House of Representative who wanted to meet with him, Dorman Walker, possibly one or more attorney's from the Attorney General's office, Randy Hinaman, the Republican Caucus, and Committee staff during the 2021 redistricting cycle. Rep. Pringle participated in a series of public hearings held by the Reapportionment Committee to receive public comments on redrawing the Alabama's congressional, State Board of Education, Alabama Senate, and Alabama House of Representatives districts. The dates and locations of these meeting are available at [https://www.legislature.state.al.us/pdf/2021-Reapportionment/Legislative%20Reapportionment%20Public%20Hearings\\_Aug%205%20.pdf](https://www.legislature.state.al.us/pdf/2021-Reapportionment/Legislative%20Reapportionment%20Public%20Hearings_Aug%205%20.pdf). Rep. Pringle also participated in two meetings of the Reapportionment Committee in 2021. The dates and minutes of these meetings are available at <https://alison.legislature.state.al.us/reapportionment-meetings-notices-2021>. Except in a general sense, Rep. Pringle's involvement in any meetings concerned solely the 2021 district map for the Alabama House of Representatives. Except for the public hearings and Reapportionment Committee meetings, these meetings happened organically, without a set schedule. During the final week of the 2021 redistricting cycle, prior to introduction of the proposed House of Representatives redistricting map, Rep. Pringle scheduled time to meet with various individual members of the House of Representatives. Rep. Pringle cannot recall each of these meetings, but the schedule will be produced to Plaintiffs.

**INTERROGATORY NO. 5: For each map drafted in the 2021 redistricting cycle, identify when it was created, who it was shared with, and when it was first made publicly available.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, any other information protected from disclosure by an applicable privilege or immunity, or maps drafted by Legislators using the State's mapping system and not released by those Legislators, as to which he has no certain knowledge. Rep. Pringle objects to this interrogatory to the extent it seeks information about maps released by other Legislators, as to which he lacks certain knowledge. Rep. Pringle objects to the extent this interrogatory seeks information about maps other than legislative maps, which are irrelevant.

Rep. Pringle further states that this response is provided in his capacity as an



individual member of the House or Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that the 2021 House of Representatives district map was formed over time between the time that the House of Representatives first received 2020 census data from the U.S. Census Bureau in August 2021 and the time that the 2021 district maps were first introduced, the weekend before the Alabama Legislature's Special Legislative Session on redistricting. The Special Legislative Session began on or about October 28, 2021 and lasted five days. Rep. Pringle recalls that the proposed 2021 district maps were shared with legislators on or about October 23, 2021, and that they were first published by Rep. Chris England on or about October 25, 2021.

Rep. Pringle's responses concern only the Alabama House of Representatives district map, although a similar timeline may be applicable to the Alabama Senate district map. Rep. Pringle lacks sufficient knowledge or information concerning the creation, sharing, or publishing of the Alabama Senate district map(s) to provide a response, however.

**INTERROGATORY NO. 6: Define the phrase “cores of existing districts,” from the Reapportionment Committee Redistricting Guidelines, as that factor was interpreted and applied by you or your agents, employees, or anyone assisting you, including Randy Hinaman, in creating Alabama’s state legislative districts during the 2021 redistricting cycle.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about the “interpret[ation] and appli[cation]” or a phrase by “agents, employees, or anyone assisting you, including Randy Hinaman,” and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House or Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he instructed Randy Hinaman to follow the Committee's Guidelines, which includes the guidance to “try to preserve the cores of existing districts.” Committee Guidelines at § II.j.(v). Rep. Pringle did not provide Randy Hinaman with additional guidance concerning this phrase. Rep. Pringle would understand the phrase “try to preserve the cores of existing districts,” to mean that it was one of the goals of the Legislature to alter pre-existing district lines only to the degree necessary to comply with the law, new census data, and the other criteria in the Guidelines. Rep. Pringle can only answer

for himself.

**INTERROGATORY NO. 7: Identify all communities of interest that the Committee and/or its agents, including Randy Hinaman, identified and credited when drafting and approving Alabama's state legislative districts during the 2021 redistricting cycle.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to any the word "credited" as too vague to allow him to know how to respond, and interprets "credited" to refer to communities of interest considered by him when drafting legislative districts, and responds accordingly. Rep. Pringle objects to the extent this interrogatory seeks information about communities of interest that "the Committee and/or its agents" identified and credited as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House or Representatives and as House Chair of the Reapportionment Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he is unaware of any "communities of interest" identified and affecting any 2021 state Senate district map. Rep. Pringle considered the Springhill community of his home district when the House districts were drawn.

**INTERROGATORY NO. 8: For each Challenged District, identify all communities of interest considered or evaluated by you or your agents, employees, or anyone assisting you, including Randy Hinaman, in creating Alabama's state legislative districts during the 2021 redistricting cycle, including which communities of interest impacted the districts adopted.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about communities of interest that "the Committee and/or its agents" identified and credited as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House or Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal—limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he is unaware of any "communities of interest" identified and affecting any 2021 state Senate district

map.

**INTERROGATORY NO. 9:** For each Challenged District, identify when the district “core” was first drawn or otherwise identified and whether the Committee sought or received any input on the drawing or identification of the district—including the identity of each person who provided said input, when that input was provided, the content of the input, and whether any change was made to the district core as a result of that input during the 2021 redistricting cycle.

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about what “the Committee sought or received” as beyond his knowledge, and responds as to himself.

Without waiving these objections, as Rep. Pringle has stated throughout, Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. All “Challenged Districts” are state Senate districts. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. As such, Rep. Pringle has no knowledge of the information Plaintiffs’ Interrogatory no. 9 seeks.

**INTERROGATORY NO. 10:** For each Challenged District, identify each change made and/or feedback incorporated to a draft map from a legislator.

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity.

Without waiving these objections, as Rep. Pringle has stated throughout, Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. All “Challenged Districts” are state Senate districts. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. As such, Rep. Pringle has no knowledge of the information Plaintiffs’ Interrogatory no. 10 seeks.

**INTERROGATORY NO. 11:** Identify and describe how the Committee, and its agents and employees, defined, monitored, or reviewed its compliance with the VRA and the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution when creating Alabama’s state legislative districts during the 2021 redistricting cycle.

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about what “the Committee and its agents and employees defined, monitored, or reviewed,” as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle’s involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle’s response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle’s knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory

to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states he instructed Randy Hinaman and Committee staff to follow the Committee Guidelines and consult with lawyers on case law, as needed. In his role as House Chair of the Committee, Rep. Pringle followed the Guidelines and consulted with lawyers on

**INTERROGATORY NO. 12: Identify and describe how the Committee and its agents and employees selected districts to perform functionality examinations or effectiveness analysis, including those analyzed in document RC 44600, produced in *Milligan v. Allen*.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity. Rep. Pringle objects to the extent this interrogatory seeks information about "how the Committee and its agents and employees selected districts to perform functionality reexaminations of effectiveness analysis", as beyond his knowledge, and responds as to himself.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

At this time, Rep. Pringle is unaware of any information responsive to this Interrogatory no. 12 that is not subject to the attorney-client privilege and/or attorney-work product protection, and declines to respond on that basis.

**INTERROGATORY NO. 13: Describe how and when racial data and awareness of racial composition were used in the drafting process of Alabama's state legislative districts during the 2021 redistricting cycle.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work-product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, Rep. Pringle states that he is unaware of "racial data [or] awareness of racial composition [being] used in the drafting process of Alabama's" Senate legislative districts "during the 2021 redistricting cycle."

**INTERROGATORY NO. 14: For the 1990, 2000, and 2010 redistricting**



**cycles, identify who drew, who directed the creation of, what criteria was relied upon, and who determined the criteria of each respective enacted map for State House of Representatives and State Senate.**

**RESPONSE:** Rep. Pringle objects to this interrogatory to the extent it seeks attorney work product, attorney-client communications, information subject to the legislative privilege, or any other information protected from disclosure by an applicable privilege or immunity.

Rep. Pringle further states that this response is provided in his capacity as an individual member of the House of Representatives and as House Chair of Committee. As House Chair, Rep. Pringle's involvement in the 2021 redistricting process for Senate districts was very minimal – limited to introducing the 2021 Senate redistricting plan, SB 1, in the House of Representatives, and then voting on SB 1 as an individual member of the House of Representatives. Rep. Pringle's response to this interrogatory does not purport to cover activities concerning any 2021 Senate redistricting map, which is outside the scope of Rep. Pringle's knowledge or involvement. Additionally, Rep. Pringle objects to this interrogatory to the degree it seeks information concerning the Alabama House of Representatives 2021 district map(s). Plaintiffs' claims do not challenge any House of Representatives districts, and therefore this information is no longer relevant or reasonably calculated to lead to the discovery of admissible evidence.

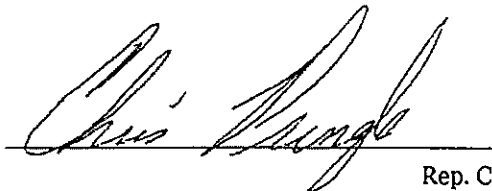
Without waiving these objections, Rep. Pringle is unaware of "who drew, who directed the creation of, what criteria was relied upon, and who determined the criteria of each respective enacted map for State House of Representatives and State Senate" for "the 1990, 2000, and 2010 redistricting cycles." Rep. Pringle believes that Ken Guin, House of Representatives Majority Leader from 1997-2010, and Marcel Black, member of the House of Representatives from 1990-2018, may have led efforts to draw prior district maps for the Alabama House of Representatives, or may have relevant information concerning who did.

#### VERIFICATION

STATE OF ALABAMA  
COUNTY OF MOBILE

Before me, the undersigned notary public, personally appeared Chris Pringle, who, after being first duly sworn on oath, did depose and say as follows:

My name is Rep. Chris Pringle. I am House Chair of the Alabama Legislature's joint Permanent Legislative Committee on Reapportionment, commonly known as the "Redistricting Committee." My responses above includes information provided by others, as well as my personal knowledge, and the facts stated therein are true and correct according to my present information, knowledge, and belief. The answers set forth herein, subject to inadvertent or undiscovered errors, are based on and therefore necessarily are limited by the records and information still in existence, presently recollected, Legislative and thus far discovered in the course of preparation of these answers and responses. Consequently, I reserve the right to make any changes in the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

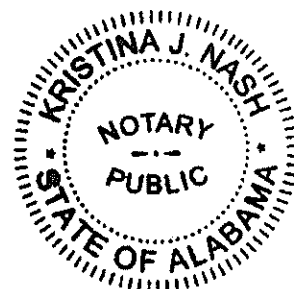


Rep. Chris Pringle

Sworn to and subscribed before me on this the 22 day of March, 2024.



Notary Public



8 | 17 | 2025

My Commission expires :

Done this 25<sup>th</sup> day of March, 2024.

/s/ Dorman Walker

Counsel for Rep. Chris Pringle



*27th day*

**CERTIFICATE OF SERVICE**

I hereby certify that on March ~~25~~ *27*, 2024, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Dorman Walker

OF COUNSEL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

**KHADIDAH STONE, *et al.*,**

*Plaintiffs,*

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

*Defendants.*

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 26**

**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

**PLAINTIFFS' RESPONSES TO DEFENDANT ALLEN'S  
DISCOVERY REQUESTS**

Pursuant to Rules 26, 33, 34, and 36 of the Federal Rules of Civil Procedure, Plaintiffs Khadidah Stone, Evan Milligan, Greater Birmingham Ministries, and Alabama State Conference of the NAACP (collectively "Plaintiffs"), submit the following objections and responses to Defendant Secretary of State Wes Allen's Discovery Requests to the Plaintiffs ("Requests").

These responses are based on the information and documents currently available to Plaintiffs, and Plaintiffs reserve the right to alter, supplement, amend, or otherwise modify these responses in light of additional facts revealed through subsequent inquiry and as appropriate under the Rules. These responses and objections are also based on Plaintiffs' 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 Plaintiffs' understanding, Plaintiffs reserve the right to supplement its responses and objections.

Information contained in any responses and objections pursuant to these Requests are not an admission or acknowledgment by Plaintiffs that: (1) such information is relevant to any claim or defense in this action; (2) is without prejudice to Plaintiffs' right to contend at any trial or in any other proceeding,



in this action or otherwise, that such information is inadmissible, irrelevant, immaterial, or not the proper basis for discovery; and (3) is without prejudice to or waiver of any objection to any future use of such information.

In responding to the requests, whenever Plaintiffs agree to produce documents, such an agreement does not constitute a representation or concession that such documents are relevant or admissible as evidence. Further, Plaintiffs' responses to the requests shall not be construed in any way as an admission that any definition provided by Defendant Allen is either factually correct or legally binding.

**OBJECTIONS AND RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 1: (Plaintiffs Stone and Milligan only):** Identify your residential address, place of employment, and social media accounts.

**OBJECTIONS TO INTERROGATORY NO. 1:** Plaintiffs object that this Interrogatory is overly broad, unduly burdensome, and seeks information that is neither relevant to any party's claims or defenses nor proportional to the needs of the case. 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 Ams. for Prosperity Found. v. Bonta*, 141 S. Ct. 2373 (2021); *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).

**RESPONSES TO INTERROGATORY NO. 1:** Subject to and without waiving these objections, Plaintiffs respond as follows:

Khadidah Stone: Ms. Stone resides at 3037 Pinehaardt Drive, Montgomery, AL 36109. She is employed by Alabama Forward. She has social media accounts on Instagram, X.com [Twitter], TikTok, Facebook, LinkedIn, and Pinterest.

Evan Milligan: Mr. Milligan resides at 4601 Vanderbilt Drive, Montgomery, AL 36116. He is self-employed as an independent contractor. He has social media accounts on Instagram and LinkedIn.

**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).

**RESPONSES TO INTERROGATORY NO. 2:** Without waiving these objections, Organizational Plaintiffs assert standing based "associational standing," that is, on behalf of impacted members.

Alabama NAACP: To support their claim of associational standing, Organizational Plaintiffs identify the following Black members who are registered to vote and reside in the Montgomery and Huntsville-Decatur areas, where Section 2 of the VRA requires the drawing of new Senate districts in which Black voters can elect candidates of choice, including the following:

- James E. Lovejoy, 9056 Black Cherry Trail, Pike Road, AL 36064
- Benard Simelton, 15376 Pepper Creek Rd., Harvest, AL 35749
- Jerry Burnet, 2405 Greenhill Drive, Huntsville, AL 35810
- Bobby Diggs, 227 Graves Blvd., Hillsboro, AL 35643
- Jo Ann Williams, 517 Southlawn Drive, Montgomery, AL 36198

Greater Birmingham Ministries: Greater Birmingham Ministries has individual members who live in the City of Huntsville and Montgomery County who identify as Black and are registered voters. GBM also has congregational members in the Ninth Episcopal District of the AME Church, which includes churches such as St. John AME Church (Huntsville), Grady - Madison AME Church (Madison), Wayman Chapel AME Church (Decatur), St. John, St. Paul, and St. Peter AME Churches (all in Montgomery), which have individual members who are Black registered voters who live in Madison County, Decatur, and Montgomery County. GBM reserves the right to amend this response to provide additional information about members who consent to having their identity disclosed.

**INTERROGATORY NO. 3:** Identify any Senate maps or districting plans known to you that contain one or more additional majority-BVAP Senate districts as compared to the 2021 Plan, which contains eight majority-BVAP Senate districts.

**OBJECTIONS TO INTERROGATORY NO. 3:** Plaintiffs object that this Interrogatory is premature as discovery is ongoing. Plaintiffs additionally object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or work product doctrine.

**RESPONSES TO INTERROGATORY NO. 3:** Without waiving these objections, Plaintiffs respond that Anthony E. Fairfax’s expert report, served to counsel by email on February 2, 2024, includes a map that adheres to traditional redistricting criteria and contains two more majority-Black Senate districts than the 2021 Plan. Moreover, consistent with the scheduling order, Plaintiffs reserve the right to produce potentially responsive information in connection with the Plaintiffs’ rebuttal expert reports.

**INTERROGATORY NO. 4: (Plaintiffs Stone and Milligan only):** Describe your involvement, if any, in any national, State or local political party. Include any leadership role you served in, the responsibilities of the position, and the timeframe that you held/hold the position.

**OBJECTIONS TO INTERROGATORY NO. 4:** Plaintiffs object that this Interrogatory is vague and ambiguous in its use of the terms “involvement” and “leadership role.” Plaintiffs object to this Interrogatory because it is overly broad as it is untethered to any temporal limitation, and seeks information that is not relevant to any party’s claims or defenses nor proportional to the needs of the case. Plaintiffs also object that this Interrogatory requests information protected by the associational rights of the First Amendment to the U.S. Constitution. *See Ams. for Prosperity Found.*, 141 S. Ct. at 2385-88; *id.* at 2390 (Thomas, J., concurring) (“The text and history of the Assembly Clause suggest that the right to assemble includes the right to associate anonymously.”); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429 (“There [is] a vital relationship between freedom to associate and privacy in one’s associations); *Perry v. Schwarzenegger*, 591 F.3d 1126, 1142 (9th Cir. 2009) (The “right to associate with others to advance

one's shared political beliefs" entails "the right to exchange ideas and formulate strategy and messages, and to do so in private," as well as "to organize and direct them in the way that will make them most effective."); *see also NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958).

**INTERROGATORY NO. 5: (Plaintiffs Stone and Milligan only):** Identify whether you have been a candidate for any national, State or local office and the party, if any, that you ran under.

**OBJECTIONS TO INTERROGATORY NO. 5:** Plaintiffs object that this Interrogatory is vague and ambiguous in that it does not define the term "office." Plaintiffs further object to this Interrogatory because it is overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party's claims or defenses nor proportional to the needs of the case. Plaintiffs further object to the extent that this Interrogatory requests information protected by the associational privilege of the First Amendment to the U.S. Constitution. *See Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9.

**RESPONSES TO INTERROGATORY NO. 5:** Without waiving these objections, Ms. Stone and Mr. Milligan respond that they have not been candidates for any national, State or local office.

**INTERROGATORY NO. 6:** If you contend it to be true, explain how you—or, in the case of the organizational Plaintiffs, your members—have been prevented from being registered to vote in Alabama at any time since 2010.

**OBJECTIONS TO INTERROGATORY NO. 6:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the term "prevented," and to the extent that it implies that the governing legal standard in this case only concerns who Alabamians have been outright denied the right to vote rather than subjected to burdensome and discriminatory restrictions and districts that provide them unequal access to political power. Plaintiffs further object to this Interrogatory because it is overly broad, unduly burdensome, and seeks information that is not proportional to the needs of the case.

Plaintiffs also object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response with expert reports and testimony or other discovery responses, including, but not limited to, depositions. Plaintiffs object to the extent that this Interrogatory calls for a legal conclusion. Plaintiffs further object to the extent this Interrogatory invades organizational Plaintiffs' members' privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable law.

**RESPONSES TO INTERROGATORY NO. 6:** Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

Khadidah Stone: Ms. Stone has not been outright denied in any attempt to register to vote in Alabama since 2010.

Evan Milligan: Mr. Milligan has not been outright denied in any attempt to register to vote in Alabama since 2010.

Greater Birmingham Ministries: GBM is not aware of whether its members have been prevented from registering to vote since 2010 but it has assisted dozens of individuals who had been denied the right to register to vote or erroneously dropped from the voting rolls successfully register to vote. Much of GBM's work and knowledge in this area involves formerly incarcerated populations. At least in part because of its involvement as a plaintiff in *Thompson v. Alabama*, No. 2:16-cv-783-ECM-SMD (M.D. Ala.), in 2017, the Alabama Legislature passed a bill to define what crimes involved "moral turpitude" for the purposes of determining which citizens can vote, which had the effect of 140,000 Alabama citizens who had previously been denied the right to vote eligible to register and vote. Even in the midst of this, however, the Alabama Secretary of State refused to provide outreach or education to these newly eligible individuals, so many of these Alabamians remain unregistered because the State never informed them

that their prior criminal convictions no longer prohibit them from voting. GBM has assisted hundreds of these people in understanding their rights and successfully registering to vote.

GBM has also assisted more than 100 individuals who were mistaken about their eligibility to register to vote, denied the right to register, and/or erroneously denied registration or dropped from the voter rolls erroneously. For example, several such individuals were erroneously denied registration as a result of a State database error that incorrectly codes eligible Alabamians as not ineligible to vote. A conviction for an attempted crime is not considered a crime of moral turpitude under Alabama law and does not take away a citizen's voting rights. GBM has assisted in many cases where county registrars denied a citizen's voter registration application because their database erroneously showed the applicant as having been convicted of a completed crime that does result in the loss of voting rights, rather than an attempted crime. GBM must address such matters on a case-by-case basis and is one of only a few organizations that do so. Accordingly, there are many Alabamians in similar situations who have lost their voting rights erroneously and that GBM has not yet been able to help or identify.

Many other types of database errors have resulted in erroneous denials of voting rights and registrations. GBM has assisted applicants for Certificates of Eligibility to Register to Vote ("CERV") who the Alabama Bureau of Pardons and Paroles ("ABPP") erroneously confused with other people. According to ABPP, they do not have unique identifiers to distinguish one applicant from another. In one case, GBM worked with an individual ("Alvin") who had spent decades in prison. Upon his release, Alvin became eligible to restore his voting rights and register to vote. Yet ABPP confused Alvin with his brother for more than six months, erroneously attributing his brother's convictions to Alvin. GBM was able to persuade ABPP that these were two different people and Alvin was CERV-eligible. Alvin was issued a CERV many months after state law required ABPP to issue it.

Based on further experience, GBM also responds that they are aware of other arbitrary actions by ABPP result in the erroneous denial of voting rights and registration. To provide one example, GBM

representatives had attended a “second chance job fair” and met about ten individuals who had lost their voting rights but were eligible to have them restored. GBM left the job fair and submitted applications on behalf of these individuals. However, ABPP later notified GBM that the agency would not accept or process these applications because ABPP had changed their application form without any notice or grace period. For several of these applications, GBM was unable to relocate the applicants to have them fill out the exact same information on a new ABPP form.

GBM is aware of another form arbitrary denial of voting rights and registration. When voter registration applicants have out-of-state convictions or federal convictions, county registrars or ABPP compare those out-of-state or federal convictions to Alabama’s list of disqualifying convictions. If there is a perceived “match,” the applicant must satisfy additional conditions (*e.g.*, repayment of legal financial obligations, sentence completion) to have their voting rights restored. However, Alabama does not have any published standards for making such a “matching” determination. This results in arbitrary applications of eligibility rules and erroneous denials. Further, if an applicant has very old convictions or out-of-state or federal convictions that are not easily or immediately retrievable, ABPP presumptively denies voting rights restoration until the applicant can retrieve all requested records and affirmatively prove their eligibility. ABPP’s arbitrary placement of the burden of proving eligibility on the applicant results in excruciating and extended delays in the restoration of voting rights of eligible applicants.

NAACP of Alabama: The NAACP of Alabama is not aware of whether its members have been prevented from registering to vote since 2010 but it through its work enforcing Section 7 of the National Voter Registration Act of 1993 (“NVRA”),<sup>1</sup> it is aware of serious deficiencies in the administration of voter registration by the Department of Human Resources and the Medicaid Agency that likely prevented many eligible Alabamians from receiving voter registration opportunities. Due to the NAACP of

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<sup>1</sup> See Letter from NAACP of Alabama to Ms. Beth Chapman, June 12, 2013, <https://www.lawyerscommittee.org/wp-content/uploads/2015/06/0395.pdf>.



Alabama's work, the Governor, Secretary of State, Department of Human Resources, and the Medicaid Agency entered into settlement agreements to ensure NVRA compliance.<sup>2</sup>

In 2018, the NAACP of Alabama, along with the Brennan Center and the League of Women Voters of Alabama, sent a letter notifying the Secretary of State's Office that Alabama's policy of immediately removing voters from registration lists based on an interstate crosscheck program violated Section 8 of the NVRA, which establishes clear requirements that states must meet before removing voters from the rolls.<sup>3</sup> This use of Crosscheck almost certainly resulted in the erroneously removal of qualified voters from the voter rolls.

Organizational Plaintiffs are also generally aware of other findings which may have affected its members' ability to participate in the political process, including the U.S. Department of Justice finding in 2015 that Alabama had "widespread noncompliance with the requirements of Section 5" of the National Voter Registration Act,<sup>4</sup> and the D.C. Circuit's finding in 2016, that the mismatch between Alabama's voter registration form and practices at the time and the federal voter registration form "is very likely to confuse the public," which "will create a disincentive for citizens who would otherwise attempt to register to vote." *League of Women Voters v. Newby*, 838 F.3d 1, 13 (D.C. Cir. 2016).

**INTERROGATORY NO. 7:** If you contend it to be true, explain how you—or, in the case of the organizational Plaintiffs, your members—have been prevented from voting in Alabama at any time since 2010.

**OBJECTIONS TO INTERROGATORY NO. 7:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the term "prevented," and to the extent that it implies

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<sup>2</sup> See Settlement Agreement Regarding Department of Human Resources (Dec. 2013), <https://www.lawyerscommittee.org/wp-content/uploads/2015/06/0396.pdf>; Settlement Agreement Regarding Medicaid Agency (Dec. 2013), <https://www.lawyerscommittee.org/wp-content/uploads/2015/06/0397.pdf>.

<sup>3</sup> See Letter regarding Alabama's Non-Compliance with Section 8, July 20, 2018.

<sup>4</sup> U.S. Dept. of Justice, *State of Alabama Agrees to Resolve Claims of National Voter Registration Act Violations* (Nov. 13, 2015)

that the governing legal standard in this case only concerns who Alabamians have been outright denied the right to vote rather than subjected to burdensome and discriminatory restrictions and districts that provide them unequal access to political power. Plaintiffs further object to this Interrogatory because it is overly broad, unduly burdensome, and seeks information that is not proportional to the needs of the case. Plaintiffs also object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response with expert reports and testimony or other discovery responses, including, but not limited to, depositions. Plaintiffs object to the extent that this Interrogatory calls for a legal conclusion. Plaintiffs further object to the extent this Interrogatory invades organizational Plaintiffs' members' privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable law.

**RESPONSES TO INTERROGATORY NO. 7:** Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

Khadidah Stone: Ms. Stone has not been outright prevented from casting a ballot in Alabama since 2010 but has had her right to vote abridged due to living in an area with racially dilutive State Senate and congressional districts.

Evan Milligan: Mr. Milligan has not been outright prevented from casting a ballot in Alabama since 2010 but has had his right to vote abridged due to living in an area with racially dilutive State Senate and congressional districts.

Greater Birmingham Ministries: GBM incorporates by reference its response to Interrogatory No. 6 and also incorporates by reference barriers to voting GBM members experienced during the 2020 election as found in *People First of Alabama v. Merrill*, 491 F.Supp.3d 1076, 1146 (N.D. Al. 2020), and that thousands of Alabamians lack sufficient ID to be able to vote, as found in *Greater Birmingham Ministries v. Sec'y of State for State of Alabama*, 992 F.3d 1299, 1312 (11th Cir. 2021).

NAACP of Alabama: NAACP of Alabama incorporates by reference its response to Interrogatory No. 6 and also incorporates by reference barriers to voting its members experienced during the 2020 election as found in *People First of Alabama v. Merrill*, 491 F.Supp.3d 1076, 1146 (N.D. Al. 2020), and that thousands of Alabamians lack sufficient ID to be able to vote as found in *Greater Birmingham Ministries v. Sec’y of State for State of Alabama*, 992 F.3d 1299, 1312 (11th Cir. 2021).

**INTERROGATORY NO. 8:** If you contend it to be true, explain how you—or, in the case of the organizational Plaintiffs, your members—have been prevented from choosing a political party to support.

**OBJECTIONS TO INTERROGATORY NO. 8:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the term “prevented,” or explain what it sense it means “choosing a political party to support.” To the extent this Interrogatory implies that the governing legal standard in this case only concerns who Alabamians have been outright denied the right to participate in party affairs. Plaintiffs further object to this Interrogatory because it is overly broad, unduly burdensome, and seeks information that is not proportional to the needs of the case. Plaintiffs also object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response with expert reports and testimony or other discovery responses, including, but not limited to, depositions. Plaintiffs object to the extent that this Interrogatory calls for a legal conclusion. Plaintiffs further object to the extent this Interrogatory invades Plaintiffs’ and organizational Plaintiffs’ members’ privacy interests—including to the extent it requests that Plaintiffs reveal individuals’ associations with political parties or voting selections, or the identities of organizational Plaintiffs’ individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment; Alabama law; and all other applicable law. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9; Ala. Code § 17-6-34.

**RESPONSES TO INTERROGATORY NO. 8:** Subject to and without waiving the foregoing objections, Plaintiffs respond that none of them understand what the question means in terms of being prevented from choosing a political party to support and so cannot say one way or the other.

**INTERROGATORY NO. 9:** If you contend it to be true, explain how you—or, in the case of the organizational Plaintiffs, your members—have been prevented from participating in the affairs of the political party that you/your members choose to support.

**RESPONSE TO INTERROGATORY NO. 9:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the term “prevented” or the phrases “participating in the affairs.” Plaintiffs object to this Interrogatory because it is overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party’s claims or defenses nor proportional to the needs of the case. Plaintiffs also object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response with expert reports and testimony or other discovery responses, including, but not limited to, depositions. Plaintiffs object to the extent that this Interrogatory calls for a legal conclusion. Plaintiffs further object to the extent this Interrogatory invades Plaintiffs’ and organizational Plaintiffs’ members’ privacy interests—including to the extent it requests that Plaintiffs reveal individuals’ associations with political parties or voting selections, or the identities of organizational Plaintiffs’ individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment; Alabama law; and all other applicable law. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9; Ala. Code § 17-6-34.

**RESPONSES TO INTERROGATORY NO. 9:** Subject to and without waiving the foregoing objections, Plaintiffs respond that none of them understand what the question means in terms of being prevented from choosing a political party to support and so cannot say one way or the other.

**INTERROGATORY NO. 10:** If you contend it to be true, detail when and in what manner black candidates have been excluded, on account of race, as candidates of the Alabama Democratic Party.

**OBJECTIONS TO INTERROGATORY NO. 10:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the term “excluded.” Plaintiffs object to this Interrogatory because it is irrelevant, overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party’s claims or defenses nor proportional to the needs of the case. Plaintiffs further object that this Interrogatory is burdensome to the extent the information it seeks is publicly available or equally accessible to Defendant as it is to Plaintiffs. Plaintiffs also object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response with expert reports and testimony or other discovery responses, including, but not limited to, depositions.

**RESPONSES TO INTERROGATORY NO. 10:** Subject to and without waiving the foregoing objections, Plaintiffs respond that none of them are part of the leadership or inner workings of the Alabama Democratic Party so lack knowledge of the extent to which the Party has discriminated against Black candidates. Plaintiffs are generally aware that, from the 1960s through today, Black voters have sued the Alabama Democratic Party over a lack of equal access to the party’s electoral processes and the party’s failure to comply with the Voting Rights Act. *See, e.g., Hadnott v. Amos*, 394 U.S. 358 (1969); *Gilmore v. Greene Cnty. Democratic Party Exec. Comm.*, 435 F.2d 487 (5th Cir. 1970); *Foster v. Jones*, No. 03-0574, 2004 WL 7344991, at \*1–2 (S.D. Ala. June 17, 2004); *Henderson v. Harris*, 804 F. Supp. 288 (M.D. Ala. 1992) (three-judge court); *Henderson v. Graddick*, 641 F. Supp. 1192 (M.D. Ala. 1986) (three-judge court); *Harris v. Graddick*, 615 F. Supp. 239 (M.D. Ala. 1985), 593 F. Supp. 128 (M.D. Ala. 1984); *MacGuire v. Amos*, 343 F. Supp. 119 (M.D. Ala. 1972) (three-judge court); *United States v. Democratic Exec. Comm. of Barbour Cnty., Ala.*, 288 F. Supp. 943 (M.D. Ala. 1968); *Smith v. Paris*, 257 F.Supp. 901 (M.D. Ala. 1966), *aff’d*, 386 F.2d 979 (5th Cir. 1967); *Gray v. Main*, 291 F. Supp. 998 (M.D.

Ala. 1966); *United States v. Exec. Comm. of Democratic Party of Dallas Cnty.*, 254 F. Supp. 537 (S.D. Ala. 1966); *see also Hawthorne v. Baker*, 750 F. Supp. 1090, 1092 (M.D. Ala. 1990) (three-judge court), *vacated*, 499 U.S. 933 (1991); *Harper v. Vance*, 342 F. Supp. 136 (N.D. Ala. 1972) (three-judge court); *Gray v. Main*, 291 F. Supp. 998 (M.D. Ala. 1966). Plaintiffs are further aware that the U.S. Department of Justice objected to numerous racially discriminatory changes to the Alabama Democratic Party's election procedures under Section 5 of the Voting Rights Act in 1974, 1976, 1982, 1989, 1990, and 1991. *See* U.S. Dep't of Justice, Civil Rights Div., Voting Determination Letters for Alabama, <https://www.justice.gov/crt/voting-determination-letters-alabama>. The Alabama Democratic Party did not remove "white supremacy" from its logo until 1966 and, that as of 1989, the governing body of the Party "was largely controlled by White Democrats in numbers disproportionate to the racial makeup of the Alabama Democratic Party electorate" and that this exclusion led to a consent decree.<sup>5</sup> Plaintiffs are also aware but lack knowledge of the veracity of the allegations in *Kelley v. Harrison*, No. 1:21-CV-56 and the statements made in 2023 by the Alabama Democratic Party Chair Kelley, which allege that some party officials were engaged in a "racist plot to divide, dilute, undermine and weaken the Black vote" on the State Democratic Executive Committee.

**INTERROGATORY NO. 11:** Detail any efforts you—or, in the case of the organizational Plaintiffs, your members—have made to join the Alabama Republican Party and explain how those efforts were met by the Alabama Republican Party.

**OBJECTIONS TO INTERROGATORY NO. 11:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the phrase "join the Alabama Republican Party." Plaintiffs object to this Interrogatory because it is overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party's claims or defenses nor proportional to the needs of the case. Plaintiffs further object that this Interrogatory is oppressive and

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<sup>5</sup> *Kelley v. Harrison*, No. 1:21-CV-56-RAH-SMD, 2021 WL 3200989, at \*1 (M.D. Ala. July 28, 2021).

burdensome to the extent the information it seeks is publicly available or equally accessible to Defendant as it is to Plaintiffs. Plaintiffs also object that this Interrogatory is premature as discovery is ongoing, and Plaintiffs reserve the right to supplement this response. Plaintiffs further object to the extent this Interrogatory invades Plaintiffs' and organizational Plaintiffs' members' privacy interests—including to the extent it requests that Plaintiffs reveal individuals' associations with political parties or voting selections, or the identities of organizational Plaintiffs' individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment; Alabama law; and all other applicable law. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9; Ala. Code § 17-6-34.

**RESPONSES TO INTERROGATORY NO. 11:** Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

Khadidah Stone: Ms. Stone has no efforts to report that she believes responds to this Interrogatory.

Evan Milligan: Mr. Milligan has no efforts to report that he believes responds to this Interrogatory.

Greater Birmingham Ministries: Greater Birmingham Ministries does not monitor the political affiliation of its individual members or of the individual members of its congregational members and therefore lacks sufficient knowledge to respond to this Interrogatory.

NAACP of Alabama: The NAACP of Alabama does not monitor the political affiliation of its members and therefore lacks sufficient knowledge to respond to this Interrogatory.

**INTERROGATORY NO. 12:** Identify the name, contact information, and race of each person you—or, in the case of the organizational Plaintiffs, your members—consider to be a leader of the Alabama Democratic Party.

**OBJECTIONS TO INTERROGATORY NO. 12:** Plaintiffs object to this Interrogatory because it is vague and ambiguous in that it does not define the term “leader.” Plaintiffs object to this Interrogatory because it is overly broad, unduly burdensome, and seeks information that is not relevant to any party’s

claims or defenses nor proportional to the needs of the case. Plaintiffs further object that this Interrogatory is oppressive and burdensome to the extent the information it seeks is publicly available or equally accessible to Defendant as it is to Plaintiffs. Plaintiffs further object to the extent this Interrogatory invades Plaintiffs' and organizational Plaintiffs' members' privacy interests—including to the extent it requests that Plaintiffs reveal individuals' associations with political parties or the identities of organizational Plaintiffs' individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and all other applicable law. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9.

**RESPONSES TO INTERROGATORY NO. 12:** Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

Khadidah Stone: I know Tabitha Isner as a leader in the Alabama Democratic Party. She identifies as white. Her email address is tabitha@tabithaisner.com.

Evan Milligan: Tabitha Isner, a white woman, is the vice chair of the Alabama Democratic Party. Ms. Isner may be reached at tabitha@tabithaisner.com.

Greater Birmingham Ministries: Greater Birmingham Ministries does not monitor the views of its members as to who they consider to be leaders of political parties so lacks a basis to answer this Interrogatory.

NAACP of Alabama: The NAACP of Alabama does not monitor the views of its members as to who they consider to be leaders of political parties so lacks a basis to answer this Interrogatory.



**OBJECTIONS & RESPONSES TO REQUESTS FOR PRODUCTION**

Without waiving or limiting in any manner any of the foregoing Continuing Objections and Objections to Definitions, but rather incorporating them into each of the following responses to the extent applicable, Plaintiffs respond to Secretary Allen's Requests for Production as follows:

**REQUEST FOR PRODUCTION NO. 1:** Produce any documents depicting or concerning "this illustrative map" referenced in Paragraph 88 of the Fourth Amended Complaint.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1:** Plaintiffs refer Defendant Allen to the illustrative map provided in Anthony E. Fairfax's expert report, served to counsel by email on February 2, 2024, and accompanying materials. Plaintiffs reserve the right to supplement this response based on further discovery and expert analysis according to the scheduling order in this case.

**REQUEST FOR PRODUCTION NO. 2:** Produce any documents concerning any effort you undertook to draw an Alabama Senate districting plan containing one or more additional majority-BVAP districts as compared to the 2021 Plan.

**OBJECTIONS & RESPONSE TO REQUEST FOR PRODUCTION NO. 2:** Plaintiffs object that this Request is premature as discovery is ongoing. Plaintiffs additionally object to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or work product doctrine. Subject to and without waiving these objections, Plaintiffs refer to Defendant Allen to Anthony E. Fairfax's expert report, served to counsel by email on February 2, 2024, and accompanying materials. Plaintiffs reserve the right to supplement this response based on further discovery and expert analysis according to the scheduling order in this case.

**REQUEST FOR PRODUCTION NO. 3:** Produce any documents concerning any maps or analysis that provides the basis for your contention that additional majority-BVAP Senate districts can be drawn in Alabama and that any such district can be reasonably constructed consistent with traditional districting criteria.

**OBJECTIONS & RESPONSE TO REQUEST FOR PRODUCTION NO. 3:** Plaintiffs object that this Request is premature as discovery is ongoing. Plaintiffs additionally object to this Request to the extent that it seeks information protected by the attorney-client privilege and/or work product doctrine. Subject to and without waiving these objections, Plaintiffs refer to Defendant Allen to Anthony E. Fairfax’s expert report, served to counsel by email on February 2, 2024, and accompanying materials. Plaintiffs reserve the right to supplement this response based on further discovery and expert analysis according to the scheduling order in this case.

**REQUEST FOR PRODUCTION NO. 4: (Plaintiffs Greater Birmingham Ministries and Alabama State Conference of the NAACP)** Produce any documents concerning how one becomes a “member” of your organization including, but not limited to, any process that is followed and any criterion that is applied.

**OBJECTIONS & RESPONSE TO REQUEST FOR PRODUCTION NO. 4:** Plaintiffs object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs further object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable law.

Subject to and without waiving these objections, Plaintiffs will produce any responsive documents.

**REQUEST FOR PRODUCTION NO. 5: (Plaintiffs Greater Birmingham Ministries and Alabama State Conference of the NAACP)** Produce any documents concerning your standing to bring the claims you assert in the Fourth Amended Complaint.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 5:** Plaintiffs object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs further object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the production of membership lists—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable law.

Subject to and without waiving these objections, Plaintiffs refer Defendants to their Answer to Interrogatory No. 2.

**REQUEST FOR PRODUCTION NO. 6:** If you contend that you—or, in the case of the organizational Plaintiffs, your members—have been prevented from being registered to vote in Alabama at any time since 2010, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 6:** Plaintiffs object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable law.

Plaintiffs also refer to documents referred to and equally available to Defendants concerning the settlement of NVRA claims and from litigation referred to in Responses to Interrogatory No. 7.

**REQUEST FOR PRODUCTION NO. 7:** If you contend that Black candidates have been excluded, on account of race, as candidates of the Alabama Democratic Party, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 7:** Plaintiffs object to the extent that this Requests call for information equally available to Defendants. Plaintiffs further object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it

requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents.

**REQUEST FOR PRODUCTION NO. 8:** If you contend that the Alabama Democratic Party refuses to associate with Black voters and/or Black candidates on account of race, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 8:** Plaintiffs object to this Request because it is vague and ambiguous in that it does not define the phrase “associate.” Plaintiffs also object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs further object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents.

**REQUEST FOR PRODUCTION NO. 9:** If you contend that the Alabama Republican Party refuses to associate with Black voters and/or Black candidates on account of race, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:** Plaintiffs object to this Request because it is vague and ambiguous in that it does not define the phrase “associate.” Plaintiffs also object to the extent that this Requests information protected by the associational privilege of the First

Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs further object to the extent this Request invades organizational Plaintiffs' members' privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents in their possession.

**REQUEST FOR PRODUCTION NO. 10:** If you contend that you—or, in the case of the organizational Plaintiffs, your members—have been prevented from choosing a political party to support, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 10:** Plaintiffs object to this Request because it is vague and ambiguous in that it does not define the phrase “choosing.” Plaintiffs also object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs further object to the extent this Request invades organizational Plaintiffs' members' privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents.

**REQUEST FOR PRODUCTION NO. 11:** If you contend that you—or, in the case of the organizational Plaintiffs, your members—have been prevented from participating in the affairs of the

political party or parties that you/your members choose to support, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 11:** Plaintiffs object to this Request because it is vague and ambiguous in that it does not define the phrase “participating.” Plaintiffs object to this Request because it is overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party’s claims or defenses nor proportional to the needs of the case as well. Plaintiffs further object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs also object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents.

**REQUEST FOR PRODUCTION NO. 12:** If you contend that you—or, in the case of the organizational Plaintiffs, your members—have been prevented from choosing a political party to support, produce any documents you have concerning that contention.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 12:** Plaintiffs object to this Request because it is vague and ambiguous in that it does not define the phrase “choosing.” Plaintiffs object to this Request because it is overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party’s claims or defenses nor proportional to the needs of the case as well. Plaintiffs further object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted

membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs also object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents.

**REQUEST FOR PRODUCTION NO. 13:** If you—or, in the case of the organizational Plaintiffs, your members—have made any effort to join the Alabama Republican Party, produce any documents you have concerning that effort, including any response from the Alabama Republican Party.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 13:** Plaintiffs object to the extent that this Requests information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs also object to the extent this Request invades organizational Plaintiffs’ members’ privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents.

**REQUEST FOR PRODUCTION NO. 14:** If you refuse to admit that many white voters in Alabama prefer Republican candidates for reasons that have nothing to do with race, produce any documents you have supporting that refusal.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 14:** Plaintiffs object to this Request because it is vague and ambiguous in that it does not define the phrase “nothing to do with race.” Plaintiffs

object to this Request because it is overly broad, unduly burdensome, untethered to any temporal limitation, and seeks information that is not relevant to any party's claims or defenses nor proportional to the needs of the case as well. Plaintiffs further object to the extent that this Request seeks information protected by the associational privilege of the First Amendment to the U.S. Constitution, including unredacted membership lists. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958); *Buckley*, 424 U.S. at 66; *Button*, 371 U.S. at 429; *Perry*, 591 F.3d at 1142 n.9. Plaintiffs also object to the extent this Request invades organizational Plaintiffs' members' privacy interests—including to the extent it requests the identification of individual members—protected by the U.S. Constitution, including the associational privilege of the First Amendment, and other applicable.

Subject to and without waiving the foregoing objections, Plaintiffs do not have any responsive documents except to the extent such documents are relied upon in expert reports.



**RESPONSES TO REQUESTS FOR ADMISSION**

Without waiving or limiting in any manner any of the foregoing Continuing Objections, but rather incorporating them into each of the following responses to the extent applicable, Plaintiffs respond to Secretary Allen's Requests for Admission as follows:

**REQUEST FOR ADMISSION NO. 1:** Admit that since at least 2000, support of Black voters has been critical to the electoral success of Democratic candidates in Alabama elections.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1:** Plaintiffs object to Request for Admission No. 1 as vague and ambiguous in that it does not define the term "critical." Subject to and without waiving the foregoing objections, Plaintiffs admit that Black voters have tended to support Democratic candidates in general, partisan elections in the elections analyzed in Alabama elections dating back to 2014, although the level of support has varied in some races depending on the race of the candidates and that Democratic candidates have only seen success when the relevant district has a majority BVAP or BCVAP or close to it, or in the rare instances when white voters support Black-preferred candidates in greater numbers than usual. As to general election races between 2000 and 2012, Plaintiffs have anecdotal and experiential information that Black voters have tended to support Democratic more than Republican candidates, but lack sufficient knowledge beyond that. For all years, Plaintiffs admit that whereas Black Democratic candidates only found success in majority-BVAP districts in state legislative races, white Democrats had success in some circumstances in majority-white districts or voter populations, strongly indicating that the race of the candidate matters above and beyond political affiliation.

**REQUEST FOR ADMISSION NO. 2:** Admit that the support of Black voters was critical to the success of Doug Jones when he was elected, as a Democrat, to the U.S. Senate from Alabama in 2017.

**RESPONSE TO REQUEST FOR ADMISSION NO. 2:** Plaintiffs object to Request for Admission No. 2 as vague and ambiguous in that it does not define the term "critical." Subject to and

without waiving the foregoing objections, Plaintiffs admit that a significant majority of Black voters voted for Doug Jones in the 2017 U.S. Senate race over his opponent, but deny the Request to the extent it overlooks the fact that his rare election as a statewide Democrat was made possible by far greater than usual white support of his candidacy as a white Democrat running against a controversial candidate.

**REQUEST FOR ADMISSION NO. 3:** Admit that, since at least 2000, Black candidates in Alabama have routinely run for elected offices in Democratic primaries and have routinely won Democratic primaries.

**RESPONSE TO REQUEST FOR ADMISSION NO. 3:** Plaintiffs object to Request for Admission No. 3 as vague and ambiguous in that it does not define the term “routinely.” Subject to and without waiving the foregoing objections, Plaintiffs admit that Black candidates for public office in Alabama have won Democratic primary races, though Plaintiffs lack sufficient knowledge of whether they tend to win or lose in greater percentages when they face a white Democrat in the primary or in majority-white electorates.

**REQUEST FOR ADMISSION NO. 4:** Admit that in 2024, Black candidates ran in the Alabama Republican Party primary, including for Alabama Congressional District 2.

**RESPONSE TO REQUEST FOR ADMISSION NO. 4:** Plaintiffs admit that four Black candidates and four white candidates sought the Republican Party nomination for Alabama’s Congressional District 2, and further admit that those four Black candidates finished fifth, sixth, seventh, and eighth, while the white candidates finished first through fourth, with the Black candidates totaling approximately 6% of the votes, and the white candidates garnering the remaining approximately 94% of the votes.

**REQUEST FOR ADMISSION NO. 5:** Admit that, in the State of Alabama, the Black preferred candidate is usually a Democrat.

**RESPONSE TO REQUEST FOR ADMISSION NO. 5:** Plaintiffs object to Request for

Admission No. 5 as vague and ambiguous because it fails to provide the time period of the Request. Given the boundless definition of time, Plaintiffs deny the Request as Black support for candidates of the different political parties has varied over time, place, particular elections, and candidates in the past 50-60 years as Black Alabamians finally gained access to the franchise in meaningful numbers.

**REQUEST FOR ADMISSION NO. 6:** Admit that, nationally, the Black preferred candidate is usually a Democrat.

**RESPONSE TO REQUEST FOR ADMISSION NO. 6:** Plaintiffs object to Request for Admission No. 6 as vague and ambiguous because it fails to provide the time period of the Request. Given the boundless definition of time, Plaintiffs deny the Request as Black support for candidates of the different political parties has varied over the history of this country, with Black political support shifting to some degree in the last half-century due to a number of factors such as differences for political support for civil rights protections, the “Southern Strategy” which relied upon race-based appeals to drive the voting patterns of white voters in the South away from the Democratic Party, and other relevant factors.

**REQUEST FOR ADMISSION NO. 7:** Admit that, in the State of Alabama, the white preferred candidate is usually a Republican.

**RESPONSE TO REQUEST FOR ADMISSION NO. 7:** Plaintiffs object to Request for Admission No. 6 as vague and ambiguous because it fails to provide the time period of the Request. Given the boundless definition of time, Plaintiffs deny the Request as white support for candidates of the different political parties has varied over the history of the State and this country, with white political support shifting significantly even in the last twenty years between political parties and varying to some degree until the past decade or two between local, state, and national races.

**REQUEST FOR ADMISSION NO. 8:** Admit that white voters can prefer Republican candidates for reasons that have nothing to do with race.

**RESPONSE TO REQUEST FOR ADMISSION NO. 8:** Plaintiffs object to Request for

Admission No. 8 as vague and ambiguous due to the term “nothing to do with race.” Plaintiffs can neither admit nor deny it on the grounds that it calls for speculation and/or contains an incomplete hypothetical and requires isolating a political system infused by race in a way not reflected by reality, particularly considering recent overtly racist laws passed with support of most Republicans such as the recent ban on diversity, equity, and inclusion efforts.

**REQUEST FOR ADMISSION NO. 9:** Admit that many white voters in Alabama prefer Republican candidates for reasons that have nothing to do with race.

**RESPONSE TO REQUEST FOR ADMISSION NO. 9:** Plaintiffs object to Request for Admission No. 9 as vague and ambiguous due to the term “nothing to do with race.” Plaintiffs can neither admit nor deny it on the grounds that it calls for speculation and/or contains an incomplete hypothetical because it calls for isolating issues in a political system infused by race in a way not reflected by reality.

**REQUEST FOR ADMISSION NO. 10:** Admit that white voters can prefer Republican candidates for policy reasons, *i.e.*, abortion, gun rights, and immigration.

**RESPONSE TO REQUEST FOR ADMISSION NO. 10:** Plaintiffs object to Request for Admission No. 10 as vague and ambiguous as to the phrase and “policy reasons.” Subject to and without waiving the foregoing and Continuing Objections, Plaintiffs deny any implication that any of these policy positions can be completely separated from race given the dominant role of race in Alabama’s political system.

**REQUEST FOR ADMISSION NO. 11:** Admit that Rep. Kenneth Paschal is a Black Republican elected to represent majority-white Alabama House District 73.

**RESPONSE TO REQUEST FOR ADMISSION NO. 11:** Plaintiffs admit this Request.

**REQUEST FOR ADMISSION NO. 12:** Admit that the Alabama Democratic Party did not have candidates for more than half of the Alabama State Senate seats up for election in 2022.

**RESPONSE TO REQUEST FOR ADMISSION NO. 12:** Plaintiffs object to Request for

Admission No. 12 as vague and ambiguous. Plaintiffs further object to this Request to the extent it seeks information equally or more readily accessible to Secretary Allen. Subject to and without waiving the foregoing and Continuing Objections, this Request is admitted.

**REQUEST FOR ADMISSION NO. 13:** Admit that the Alabama Democratic Party did not have candidates for more than half of the Alabama State Legislature seats up for election in 2022.

**RESPONSE TO REQUEST FOR ADMISSION NO. 13:** Plaintiffs object to Request for Admission No. 13 as vague and ambiguous. Plaintiffs further object to this Request to the extent it seeks information equally or more readily accessible to Secretary Allen. Subject to and without waiving the foregoing and Continuing Objections, this Request is admitted.

**REQUEST FOR ADMISSION NO. 14:** Admit that citizen voting age population (“CVAP”) calculated by the Census Bureau is based on a collection of survey estimates, not a count of the population like the decennial Census.

**RESPONSE TO REQUEST FOR ADMISSION NO. 14:** Plaintiffs admit that the Census Bureau creates a “custom tabulation of the citizen voting age population” from five years of data from the American Community Survey (ACS), which means approximately 17.7 million households receive surveys in a typical five-year period nationwide, as do approximately 315,000 households in Alabama over the same period.

**REQUEST FOR ADMISSION NO. 15:** Admit that the 2020 Census did not ask respondents about whether they were citizens.

**RESPONSE TO REQUEST FOR ADMISSION NO. 15:** Plaintiffs admit that despite the U.S. Department of Commerce attempting to place such a question on the 2020 Decennial Census, the 2020 Decennial Census questionnaire did not ask about citizenship after the Supreme Court found that “the VRA enforcement rationale—the sole stated reason [provided for its addition]—seems to have been contrived,” and thus affirmed the district court’s decision enjoining its addition on that ground. *Dep’t of*

*Com. v. New York*, 139 S. Ct. 2551, 2575 (2019).

**REQUEST FOR ADMISSION NO. 16:** Admit that the ACLU opposed including a question on the 2020 Census asking respondents whether they were citizens.

**RESPONSE TO REQUEST FOR ADMISSION NO. 16:** Plaintiffs admit that the ACLU not only opposed, but successfully litigated the issue before the U.S. Supreme Court, where the Court affirmed the district court’s injunction against adding the question, finding that “the VRA enforcement rationale—the sole stated reason [provided for its addition]—seems to have been contrived,” and thus affirmed the district court’s decision enjoining its addition on that ground, *Dep’t of Com. v. New York*, 139 S. Ct. 2551, 2575 (2019)—a decision which including finding that former DOJ official John Gore admitted “that CVAP data collected through the census questionnaire” as opposed to the ACS “is not necessary for [the U.S. Department of Justice’s] VRA enforcement efforts.” *New York v. U.S. Dep’t of Com.*, 351 F. Supp. 3d 502, 556–57 (S.D.N.Y.), *aff’d in part, rev’d in part and remanded sub nom. Dep’t of Com. v. New York*, 139 S. Ct. 2551 (2019).

**REQUEST FOR ADMISSION NO. 17:** Admit that the NAACP LDF opposed including a question on the 2020 Census asking respondents whether they were citizens.

**RESPONSE TO REQUEST FOR ADMISSION NO. 17:** Plaintiffs admit that LDF not only opposed adding a citizenship question to the 2020 Decennial Census, but also submitted an amicus brief in the Supreme Court explaining that, among other things, “[e]xisting data sources, including citizenship data obtained through” census surveys, “have proven more than sufficient” for litigating cases under Section 2 of the VRA.

**REQUEST FOR ADMISSION NO. 18:** Admit that Alabama has used single-member districts to elect Members of the Alabama Senate for more than 40 years.

**RESPONSE TO REQUEST FOR ADMISSION NO. 18:** Plaintiffs object to Request for Admission No. 18 to the extent it seeks information equally or more readily accessible to Secretary Allen.

Subject to and without waiving the foregoing and Continuing Objections, this Request is admitted.

**REQUEST FOR ADMISSION NO. 19:** Admit that U.S. Senator Howell Heflin was elected from the State of Alabama in, *inter alia*, 1984, when he received more than 60% of the vote.

**RESPONSE TO REQUEST FOR ADMISSION NO. 19:** Plaintiffs object to Request for Admission No. 19 to the extent it seeks information equally or more readily accessible to Secretary Allen. Subject to and without waiving the foregoing and Continuing Objections, this Request is admitted.

**REQUEST FOR ADMISSION NO. 20:** Admit that Joe Reed and the Alabama Democratic Conference endorsed Hillary Rodham Clinton over Barack Obama in 2008.

**RESPONSE TO REQUEST FOR ADMISSION NO. 20:** Plaintiffs object to Request for Admission No. 20 to the extent it seeks information equally or more readily accessible to Secretary Allen. Subject to and without waiving the foregoing and Continuing Objections, Plaintiffs admit that Joe Reed and the ADC endorsed Hillary Clinton over Barack Obama in 2008 contrary to the preferences of Black voters, 84% of whom voted for then-Senator Obama in the primary, in contrast to the white primary voters, 72% of whom gave then-Senator Hillary Clinton their vote.

DATED this 27th day of March 2024.

/s/ Alison Mollman

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**VERIFICATION OF INTERROGATORY RESPONSES**

I, Khadidah Stone, 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 'Khadidah Stone', written over a horizontal line.

Khadidah Stone

Dated: 3/27/24

**VERIFICATION OF INTERROGATORY RESPONSES**

I, Evan Milligan, 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.



Evan Milligan

Date: 3/27/24

**VERIFICATION OF INTERROGATORY RESPONSES**

I, Scott Douglas, believe, based on reasonable inquiry, that the foregoing answers submitted on behalf of Greater Birmingham Ministries 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", is positioned above a horizontal line.

Scott Douglas

Dated: 3/27/24

**VERIFICATION OF INTERROGATORY RESPONSES**

I, Benard Simelton, 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.

  
**Benard Simelton**

**Dated:** *March 26, 2024*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2024, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Davin Rosborough  
Davin Rosborough

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

**KHADIDAH STONE, *et al.*,**

*Plaintiffs,*

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

*Defendants.*

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 27**

**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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**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", is positioned above 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

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

**KHADIDAH STONE, *et al.*,**

*Plaintiffs,*

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

*Defendants.*

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 28**

**KHADIDAH STONE, et al.**

**Vs.**

**WES ALLEN, et al.**

**BENARD SIMELTON**

**April 22, 2024**



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Page 33

1 **Q. Do you think you could put an "X" next to**  
2 **the counties where --**  
3 A. Where we do not have one?  
4 **Q. Where you don't have --**  
5 A. And, and this is where we don't -- okay.  
6 This is where we do not have one.  
7 **Q. Yeah. Where you don't have a branch.**  
8  
9 (Witness marks on the document.)  
10  
11 A. I think that's.  
12 **Q. Great. And I'll mark that as Exhibit 3.**  
13  
14 (Whereupon Defendant's Exhibit 3  
15 was marked for identification, a copy  
16 of the same is attached thereto.)  
17  
18 **Q. Thank you, sir.**  
19 A. Beg your pardon?  
20 **Q. I said, "Thank you, sir."**  
21 A. Oh, okay.  
22 **Q. What does -- what does it take to form a**  
23 **branch?**

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1 A. If you're starting from scratch, you need  
2 a hundred members that have paid their membership  
3 dues. And the membership -- I mean, those hundred  
4 members have to form a organizing committee that  
5 will be responsible for collecting those dues and  
6 submitting those dues either directly to the  
7 national or through the State Conference to the  
8 national.  
9 And, of course, after that, they will need  
10 to have an election. And once they've held their  
11 elections and the National has the membership  
12 dues, they will issue -- well, they -- the  
13 National will issue them a charter. And after  
14 they have the charter, they will move forth and  
15 have their election.  
16 And once they have their election, they  
17 are officially a bona fide branch or unit. And  
18 that's for the branches. And for the college  
19 chapter, all the youth units, it's 25 members that  
20 you have to have. And they go basically through  
21 the same process. And it's approved by the  
22 national board of directors to issue a charter to  
23 that particular unit, that particular organization

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1 at that time.  
2 **Q. Once a branch has been organized, what**  
3 **does it take for them to maintain their status?**  
4 A. They have to pay their \$50 -- I mean, not  
5 \$50. They have to maintain 50 members each year  
6 active. They have to pay their assessment to the  
7 State and to the National and file their -- what  
8 we call the year-end financial report. Or it's  
9 called annual financial report. And I don't know  
10 if I mentioned that for the State Conference. But  
11 the State Conference also has to file an annual  
12 financial report as well.  
13 **Q. Real quick, I'm just not sure that I got**  
14 **this --**  
15 A. Okay.  
16 **Q. -- you know, fully. So you indicated**  
17 **earlier that you're not aware of any adverse**  
18 **proceedings between the State Conference and the**  
19 **national chapter since 2002 when you first got**  
20 **involved?**  
21 A. You said national chapter.  
22 **Q. I'm sorry. The national organization --**  
23 A. Okay.

Page 36

1 **Q. -- and the state chapter, you're not aware**  
2 **of any --**  
3 A. State Conference. But.  
4 **Q. I'm sorry. I'll get it eventually. The**  
5 **national organization and the State Conference,**  
6 **you're not aware of any adverse action between the**  
7 **two since 2002.**  
8 A. Right.  
9 **Q. Is that your testimony?**  
10 A. Right.  
11 **Q. So then back to, real quick, to the annual**  
12 **convention. The delegates are made up of**  
13 **branches. Do the branches elect their own**  
14 **delegates?**  
15 A. Yes. And, again, that's units because the  
16 youth and college units also participate. So.  
17 **Q. How many members does the State Conference**  
18 **currently have?**  
19 A. The exact number of current members, it  
20 fluctuates from day to day. So we use a rough  
21 figure of around 5,000 members.  
22 **Q. Does a member have to pay their dues**  
23 **annually?**





Page 37

1 A. Yes.

2 **Q. And what does that cost?**

3 A. Well, let me back up. If you have a

4 regular membership, you pay \$30 annually. If you

5 have a -- what we call a fully paid life member,

6 you don't have to pay anything annually.

7 If you are a subscribing life member, then

8 you pay depending on what level of subscribing

9 life you are. The minimum is \$75 dollars

10 annually. And you pay that for ten years or until

11 you pay \$750.

12 And then, the life membership go up from

13 there. You know, \$1500 for -- I think it's called

14 golden heritage. And then a diamond life is

15 \$2500. And once you've paid that, you know,

16 you're paid for life.

17 **Q. What is the -- just the standard life**

18 **membership? How much does that cost?**

19 A. Standard life?

20 **Q. Right.**

21 A. Okay. A minimum life is civil life. And

22 so that's \$750.

23 **Q. Okay.**

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1 A. For -- again, that's for branches. It's

2 different for youth units. So.

3 **Q. And so about \$750 people are donating.**

4 **Are people -- are people giving donations, then,**

5 **about \$750?**

6 A. What do you mean "donations"? Because

7 you're paying for a life membership. I'm not sure

8 what you mean by "donation."

9 **Q. Well, they're paying more than the life**

10 **membership. Right? Why would a person -- let me**

11 **ask it this way. Does a person receive anything**

12 **additional for a diamond life membership or a gold**

13 **life membership?**

14 A. Yes.

15 **Q. What do they receive?**

16 A. Well, you receive a plaque. And then you

17 receive a pennant on your -- to wear on your

18 lapel.

19 **Q. Is there anything else?**

20 A. No.

21 **Q. Okay. Now, you said you were first**

22 **elected president in 2009 at the annual meeting.**

23 **Are you elected annually? Or what's your term?**

Page 39

1 A. It's for two years.

2 **Q. So you've been elected several times since**

3 **2009.**

4 A. A few times.

5 **Q. When a person wants to join the State**

6 **Conference, are their dues paid to the State**

7 **Conference? Or who do they pay?**

8 THE WITNESS: Someone wants to be

9 admitted.

10 THE REPORTER: Okay. Can we go

11 off the record a second? Thank you.

12

13 (There was a short break in the deposition.)

14

15 THE REPORTER: Okay. Back on the

16 record.

17 **Q. (BY MR. TAUNTON:) When a person joins the**

18 **NAACP in Alabama, they pay their dues. Who are**

19 **they paying their dues to?**

20 A. There's -- well, first of all, I think you

21 asked about the State Conference. It's -- the

22 State Conference itself does not have members.

23 Every member that serves in the State Conference

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1 is a member of a branch or a college chapter

2 within the State Conference.

3 And they are elected to serve as a member

4 of the State Conference. But they're not -- you

5 know, you don't get a membership to the State

6 Conference. And they pay their dues to the unit

7 that they are wanting to associate with.

8 If you go online, you can pay them

9 directly to the national. And in turn, the

10 national sends your portion -- meaning the unit's

11 portion -- of those dues back to them. If I were

12 to join, if Stuart were to join the -- we're in

13 Limestone.

14 If you were to join the Limestone County

15 branch by filling out an application, the unit

16 Limestone County branch would send the national

17 their portion of those dues and just keep the

18 other portion in their treasury in the coffers.

19 **Q. So if a person paid the national**

20 **organization, they would remit a portion of those**

21 **dues back to the units?**

22 A. Yes.

23 MR. NAIFEH: Objection, form.



Page 41

1 **Q. (BY MR. TAUNTON:) So how is the State**  
2 **Conference funded?**

3 A. Fundraising.

4 MR. NAIFEH: Object to the form  
5 again. You can answer, though.

6 **Q. (BY MR. TAUNTON:) Any other way?**

7 A. I mean, fundraising, donations.

8 **Q. Are those -- but those are separate from**  
9 **membership dues; is that correct?**

10 A. Yes. We don't --

11 **Q. Okay.**

12 A. -- get -- we're not part of the membership  
13 dues. We don't get those. That's the unit.

14 **Q. Where is that fundraising primarily done?**  
15 **Is that done in Alabama or elsewhere?**

16 A. There are organizations outside the state  
17 that, you know, may send us funds to do civic  
18 engagement work. So but our fundraising efforts  
19 are primarily in the state of Alabama.

20 **Q. You've mentioned that members of the units**  
21 **would then be elected to the State Conference. Is**  
22 **that -- is that the same as being a delegate to**  
23 **the state convention? Or is that separate?**

Page 42

1 A. It's separate.

2 **Q. Okay. So tell me about being elected to**  
3 **the State Conference. How --**

4 A. Okay.

5 **Q. -- how is that handled?**

6 A. Each year during our annual state  
7 convention, units -- including branches and the  
8 youth and college units -- will elect their  
9 delegates to the state convention. Prior to that  
10 process taking place, the State Conference elect  
11 a -- it's an election procedures committee that is  
12 responsible for notifying all the members through  
13 its units that they are accepting nominations for  
14 positions for, you know, all the positions within  
15 the State Conference from president down to, you  
16 know, all our standing -- not standing committee  
17 chair -- but all of our officers and executive  
18 committee members at large.

19 If a person wants to run for one of those  
20 offices, they submit a form to this committee.  
21 The committee reviews it with the State secretary  
22 to confirm that that person's membership is good  
23 and will be valid throughout the election process.

Page 43

1 Once that is confirmed, that person named  
2 goes on the ballot. And then at the state  
3 convention, all delegates who are properly  
4 registered, the State Conference secretary sends a  
5 notification to the national saying these are the  
6 delegates for, you know, our state convention,  
7 registered -- properly registered delegates.

8 So that person has to be a member in good  
9 standing. And, of course, when they're elected  
10 from the unit, the unit's supposed to check that.  
11 But just double-check with the State Conference  
12 secretary who has access to the statewide, what we  
13 call, membership portal.

14 Once the -- those names are verified and  
15 that they are members in good standing, their  
16 names will go on a ballot. We send those to the  
17 national office. And they conduct the election  
18 through a system called Election Buddy. And on  
19 election day at the state convention, each  
20 delegate that has a valid email address or a phone  
21 will receive a ballot. And they cast a ballot.  
22 And Election Buddy totals the, you know, the, the  
23 votes.

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1 **Q. Great. Now, when your name goes on a**  
2 **ballot, is that going on a ballot for a specific**  
3 **position, then?**

4 A. Yes.

5 **Q. And so you mentioned an executive**  
6 **committee. Is that one of the positions that a**  
7 **person can run for?**

8 A. No. It's an executive committee at large.  
9 And we can elect up to -- I think it's 21  
10 members --

11 MR. WALKER: Come in.

12 A. -- 21 members at large or something like  
13 that.

14 MR. TAUNTON: Dorman, you're not  
15 on mute.

16 A. So we can look up to -- I think it's 21  
17 members at large. And that does not include the  
18 officers of the association.

19 **Q. (BY MR. TAUNTON:) Okay. And how many**  
20 **officers does the State Conference have?**

21 A. Let's see. One, two, three, four, five,  
22 six, seven -- eight.

23 **Q. Is there any other position that a**



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

**KHADIDAH STONE, *et al.*,**

*Plaintiffs,*

**vs.**

**CHRIS REP. PRINGLE, *et al.*,**

*Defendants.*

**Case No.: 2:21-cv-1531-AMM**

**EXHIBIT 29**

**KHADIDAH STONE, et al.**

**VS**

**WES ALLEN, et al.**

**30(b)(6)**

**SCOTT DOUGLAS**

**April 23, 2024**



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1 Q. Of 2015?

2 A. 2015. We voted on one amendment.

3 Oh. If you look over --

4 Q. Is the language of Defendants' Exhibit 5  
5 reflected anywhere in Defendants' Exhibit 4? I'll  
6 tell you I couldn't find it, but I want to make  
7 sure I didn't miss something.

8 A. Yes. It looks like the amendment as  
9 passed, as voted on, was added to the -- I'm  
10 sorry.

11 In Exhibit 5, the amendment that was  
12 proposed for the meeting is incorporated, one, in  
13 the wrong section.

14 Q. Okay. So you think the amendment as  
15 passed is the highlighted portion of Defendants'  
16 Exhibit 4?

17 A. Yes.

18 Q. Have there been any amendments to Greater  
19 Birmingham Ministries's bylaws since November 5th,  
20 2015?

21 A. No.

22 Q. How many committees does Greater  
23 Birmingham Ministries have?

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1 A. How many committees?

2 Q. Yes, sir.

3 A. Oh. Administrative committees --  
4 administrative committee -- administratively,  
5 there are three. And there's a separate committee  
6 for each program area for another three. So  
7 that's six.

8 Q. What are the administrative committees?

9 A. Finance committee -- the administrative  
10 committees are Finance Committee, Personnel  
11 Committee, I'm sorry. Finance Committee,  
12 Personnel Committee, Building and Grounds  
13 Committee.

14 Q. And what are the -- task force? Is that  
15 what you call it?

16 A. Task forces or work groups.

17 Q. What are those committees?

18 A. The work groups are -- mimic our program  
19 areas: Faith in Community Work Group, Systems  
20 Change Work Group, Direct Services Work Group.  
21 Those are functionally the committees of those  
22 three program areas.

23 Q. And just real quick, I could look back,

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1 but what was the last one you said, remind me?

2 A. Building and Grounds.

3 Q. No, I'm sorry. Of the work groups?

4 A. Oh, work groups? Systems Change Work  
5 Group, Faith in Community Work Group, Direct  
6 Services Work Group.

7 Q. Direct Services.

8 A. Not in the same order.

9 Q. All right. Before I completely move on  
10 here, let me see. Hang on.

11 (Defendants' Exhibit 6 was marked  
12 for identification and copy of  
13 same is attached hereto.)

14 Q. I'm going to hand you what I have marked  
15 as Defendants' Exhibit 6. This is the same  
16 document, but it's printed double sided.

17 Have you seen this document before?

18 A. Yes.

19 Q. And for those on Zoom, what is that  
20 document?

21 A. This document is titled Plaintiffs'  
22 Responses to Defendant Allen's Discovery Requests.

23 Q. Is that one of the documents you reviewed

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1 in preparation for your deposition?

2 A. Yes.

3 Q. Do you mind flipping with me over to  
4 page 4 and taking a look at -- well, let's  
5 actually start on page 3, I'm sorry. Let's take a  
6 look at Interrogatory Number 2.

7 Interrogatory Number 2 is Greater  
8 Birmingham Ministries and the Alabama Conference  
9 of the NAACP only; is that right?

10 A. Correct.

11 Q. And that interrogatory asks Greater  
12 Birmingham Ministries to "State with specificity  
13 the facts supporting your assertion of standing to  
14 bring the claims you press in the fourth amended  
15 complaint." Do you see that?

16 A. Yes.

17 Q. If we flip over to page 4, under response  
18 to Interrogatory Number 2, there's a section  
19 titled Greater Birmingham Ministries. Do you see  
20 that?

21 A. Yes.

22 Q. Is it your understanding that that's  
23 Greater Birmingham Ministries's response to that



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1 interrogatory?

2 A. Yes.

3 Q. And beginning of that says "Greater  
4 Birmingham Ministries has individual members who  
5 live in the City of Huntsville and Montgomery  
6 County who identify as black and are registered to  
7 vote." Do you see that?

8 A. Correct.

9 Q. Does it list any of those individuals in  
10 this response? Are any individuals listed in this  
11 response by Greater Birmingham Ministries?

12 A. It does not list any individual members.

13 Q. The last sentence says "Greater  
14 Birmingham Ministries reserves the right to amend  
15 their response to provide additional information  
16 about members who consent to having their identity  
17 disclosed." Do you see that?

18 A. Correct.

19 Q. Are you prepared to provide additional  
20 information about individual members here today?

21 A. I can send them -- we could talk to  
22 people.

23 Q. But sitting here today, do you have any

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1 additional -- do you have any names or information  
2 to provide about that?

3 A. Yeah, one.

4 Q. Okay. Who would that be?

5 A. Montgomery County.

6 Q. Okay.

7 A. But I can't remember her address.

8 Q. What's the name?

9 A. Presdelane, P-R-E-S-D-E-L-A-N-E, Harris,  
10 H-A-R-R-I-S.

11 Q. Can you spell that first name for me  
12 again, I'm sorry.

13 A. P-R-E-S-D-E-L-A-N-E.

14 Q. And you don't have an address?

15 A. I don't have it with me.

16 Q. But you believe she resides in Montgomery  
17 County?

18 A. Yes.

19 Q. Any others?

20 A. That's one.

21 Q. Thank you.

22 What does the -- I think you called it  
23 Faith in Community Task Force?

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1 A. Yes.

2 Q. What does the Faith in Community Task  
3 Force do?

4 A. The Faith in Community Task Force is  
5 responsible for nourishing and maintaining GBM's  
6 relationships with its constituent faith  
7 communities, congregations, and denominations.

8 Q. How do they do that?

9 A. They do that through working on shared  
10 programs offered by the partner groups, the  
11 sponsoring groups, or initiated by GBM.

12 Q. What would be an example of a program  
13 that they might do?

14 A. A program? The name escapes me. It was  
15 very popular before the pandemic and revived  
16 itself now. It's called the Poverty Game. And it  
17 is an exercise, kind of like Monopoly, except you  
18 are dealt with bail money and -- or education  
19 tuition, those things. And it's a game in which  
20 people really learn how difficult navigating  
21 poverty is. Yeah. And it's kind of -- what can I  
22 say? It de -- it de-idolizes views about poverty  
23 in a participatory way. Yeah.

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1 Q. What are some other examples of events  
2 that might be hosted?

3 A. Another example is, once again, a -- this  
4 was during online season as well. A civic  
5 education course called the Power of  
6 Participation. Instead of talking to somebody  
7 about voting and voter registration and voter  
8 restoration, we talk about civic participation  
9 from participating in public hearings up to and  
10 including what level of government is responsible  
11 for what in your life, you know.

12 Q. And what is the goal of that event?

13 A. It comes out of people asking us  
14 questions, because sometimes they think we know,  
15 what agency is responsible for this problem or for  
16 addressing this problem. And many times, because  
17 of lack of transparency, it's hard to figure out.

18 Q. What does the Direct Services Task Force  
19 do?

20 A. Direct Services Task Force or Work Group  
21 is responsible for also working with the  
22 sponsoring faith communities as well as with other  
23 agencies in providing free food to qualified

