

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

ALABAMA LEGISLATIVE BLACK)	
CAUCUS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CASE NO. 2:12-CV-691
)	(Three-Judge Court)
v.)	
)	
THE STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Defendants.)	

ALABAMA DEMOCRATIC)	
CONFERENCE, <i>et al.</i> ,)	
)	
Plaintiffs,)	CASE NO. 2:12-CV-1081
)	(Three-Judge Court)
v.)	
)	
THE STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Defendants.)	

**Defendants’ Motion to Amend the Briefing Schedule,
for Leave to Conduct Limited Discovery,
and to Shorten Time for Discovery Responses**

In regard to the new plans submitted by the Plaintiffs in response to the Court’s order (doc. 283), Defendants, pursuant to Rule 26(b) of the Federal Rules of Civil Procedure and other applicable provisions, move that the court amend the briefing schedule to provide an additional three weeks for Defendants to file a

responsive brief (through November 13, 2015). Defendants also seek leave to conduct limited discovery concerning the new plans, and they ask that the Court shorten the time for responding to those requests. In support of this motion, Defendants state as follows:

Statement of the parties' positions: Counsel for Defendants discussed this motion with counsel for Plaintiffs, and Plaintiffs oppose the motion. As Defendants understand Plaintiffs' position, both sets of Plaintiffs would prefer that the parties assess the need for more time and additional discovery after the conclusion of depositions scheduled for next week. However, as discussed herein, the information Defendants seek through the requested discovery could not come from the drafters of the plans, and waiting until after the depositions would not permit time for the requested discovery, should the court grant leave.

1. This Court ordered the Plaintiffs to submit new plans that complied with the Legislature's population deviation requirement and other Legislative guidelines. (Doc. 283). The Court ordered Defendants to respond to those plans within 28 days. *Id.*

2. On September 25, 2015, the ALBC plaintiffs and the ADC plaintiffs filed new plans for the House and Senate. (*See* docs. 285, 287). Defendants' response is thus currently due on October 23, 2015.

3. The ALBC plaintiffs submitted 193 exhibits, maps, and charts with their plan, as well as a 109-page brief. (Doc. 285, 286). The ADC plaintiffs submitted a brief of 32 pages and 37 exhibits. (Doc. 287).

4. Although there is already a great deal of information about the new plans to digest, additional information is needed to assess the plans, including, without limitation, the political viability of the plans. The ALBC Plaintiffs make clear that the plans are a “redistricting exercise” and “are not presented as proposed remedial plans, because they have had no input from plaintiff ALBC members or from other members of the Legislature.” (Doc. 285 at 6). The ADC Plaintiffs state that they “do not expect or propose that the plans will or should be adopted either by the State or by the Court.”(Doc. 287 at 5). Nonetheless, when considering what, if anything, the new plans prove, the Court should consider them not in a vacuum but within political realities. Defendants’ proposed discovery thus asks whether Plaintiffs would support the plans (and if not, why not), whether the plans adequately provide opportunities for black voters to elect their candidate of choice, and whether the members of ADC and ALBC believe that the plans satisfy constitutional and statutory requirements.

5. In addition, for the ADC plan, information is needed about voting age population, incumbent residences, precinct splits, and similar information to assess the plan. For example, ALBC provided charts showing, for each precinct split, the racial composition of each portion of the precinct. (ALBC ex. APSX 633). Having the same information for the new ADC plan will assist the Court and the parties in

making accurate comparisons. Moreover, while the ADC plaintiffs provided overlay maps as the Court requested, the overlays make the maps difficult to read. Defendants will seek “clean” copies of the ADC 1% plan to better identify the new proposed district lines. (Counsel for Defendants and Counsel for the ADC Plaintiffs have already begun discussions about receiving “clean” maps and loading the ADC plan into the Reapportionment Office’s system, which would make the needed information available; it thus appears that at least some of the information requested in the proposed requests for production will be provided voluntarily or through other means).

6. For these reasons, Defendants seek leave to propound the discovery requests attached hereto as Exhibits 1 and 2.

7. Defendants are scheduled to depose the drafters of the new plans on October 6 and 7, 2015. To have sufficient time to assess and respond to the volume of material already supplied, the upcoming deposition testimony, and the additional information sought, Defendants seek an extension of three weeks, until November 13, 2015, to respond to the plans.

8. In order to have time to fully incorporate discovery responses into their brief, Defendants ask that the Court shorten the time for a response so that Plaintiffs’ discovery responses will be due on or before October 26, 2015.

WHEREFORE, Defendants move the Court to extend the deadline for Defendants’ brief for three weeks, with a due date of November 13, 2015; to enter an

order permitting the attached limited discovery by the Defendants; and to enter an order requiring that Plaintiffs respond to such discovery on or before October 26, 2015.

Respectfully submitted,

LUTHER STRANGE
Attorney General of Alabama

By:

s/ James W Davis
Andrew L. Brasher (ASB-4325-W73B)
Solicitor General
Megan Kirkpatrick (ASB-2652-M66K)
James W. Davis (ASB-4063-I58J)
Misty S. Fairbanks Messick
Assistant Attorneys General
Office of the Attorney General
State of Alabama
Post Office Box 300152
Montgomery, AL 36130-0152
Telephone: 334-242-7300
abrasher@ago.state.al.us
mkirkpatrick@ago.state.al.us
jimdavis@ago.state.al.us
mmessick@ago.state.al.us

John J. Park, Jr. (ASB-xxxx-P62J)
Deputy Attorney General
Strickland Brockington Lewis LLP
Midtown Proscenium Suite 2200
1170 Peachtree Street NE
Atlanta, GA 30309
Telephone: 678-347-2200
Fax: 678-347-2210
jjp@sblaw.net

Counsel for the State Defendants

David B. Byrne, Jr.
Legal Advisor to Governor Robert Bentley
Office of the Governor
Alabama State Capitol
600 Dexter Avenue, Suite NB-05
Montgomery, Alabama 36130
Telephone: 334-242-7120
Fax: 334-242-2335
david.byrne@governor.alabama.gov

Algert S. Agricola, Jr.
Ryals, Donaldson & Agricola, P.C.
60 Commerce Street, Suite 1400
Montgomery, Alabama 36104
Telephone: 334-834-5290
Fax: 334-834-5297
aagricola@rdafirm.com

Counsel for the State of Alabama and Governor Bentley

s/ Dorman Walker _____
Dorman Walker (ASB-0717-R81J)
Balch & Bingham LLP
Post Office Box 78
Montgomery, AL 36101-0078
Telephone: 334-834-6500
Fax: 334-269-3115
dwalker@balch.com

Counsel for Defendants-Intervenors Jim McClendon, Gerald Dial and Randy Davis

CERTIFICATE OF SERVICE

I hereby certify that, on September 29, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

James U. Blacksher
Attorney at Law
Post Office Box 636
Birmingham, Alabama 35201
jblacksher@ns.sympatico.ca

William F. Patty
The Gardner Firm, P.C.
Post Office Box 991
Montgomery, Alabama 36101-0991
bpatty@thegardnerfirm.com

Edward Still
Edward Still Law Firm LLC
429 Green Springs Hwy, Ste 161-304
Birmingham, Alabama 35209
still@votelaw.com

Walter S. Turner
Walter S. Turner, Esq.
Post Office Box 6142
Montgomery, Alabama 36106
wsthayer@juno.com

U.W. Clemon
White Arnold & Dowd, P.C.
2025 Third Avenue North, Suite 500
Birmingham, Alabama 35203
uwclemon@whitearnolddowd.com

John K. Tanner
Attorney at Law
3743 Military Road, NW
Washington, DC 20015
john.k.tanner@gmail.com

James H. Anderson
Joel T. Caldwell
Copeland, Franco, Screws & Gill, P.A.
Post Office Box 347
Montgomery, Alabama 36101-0347
anderson@copelandfranco.com
caldwell@copelandfranco.com

Richard H. Pildes
40 Washington Square South
New York, NY 10012-1005

Joe M. Reed
Joe M. Reed & Associates, LLC
524 South Union Street
Montgomery, Alabama 36104
joemreed@wowway.net

s/ James W Davis _____
Of Counsel

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

ALABAMA LEGISLATIVE BLACK)	
CAUCUS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CASE NO. 2:12-CV-691
)	(Three-Judge Court)
v.)	
)	
THE STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Defendants.)	

ALABAMA DEMOCRATIC)	
CONFERENCE, <i>et al.</i> ,)	
)	
Plaintiffs,)	CASE NO. 2:12-CV-1081
)	(Three-Judge Court)
v.)	
)	
THE STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Defendants.)	

Defendants’ Interrogatories to the ALBC Plaintiffs

Defendants, pursuant to Rule 33 of the Federal Rules of Civil Procedure, propound the following interrogatories to the ALBC Plaintiffs to be answered in accordance with the Rules and any applicable court orders:

Definitions

- A. The “**ALBC 1% Plan**” refers to that plan, including maps for both the House and Senate, submitted by the ALBC Plaintiffs in response to the Court’s order of August 28, 2015 (doc. 283).
- B. The “**ADC 1% Plan**” refers to that plan, including maps for both the House and Senate, submitted by the ADC Plaintiffs in response to the Court’s order of August 28, 2015 (doc. 283).

Interrogatories

- 1. If the ALBC 1% plan were introduced in the Legislature, would each member of the ALBC support its passage?
 - a. If not, please identify each member of ALBC who would not support its passage, and state the reasons such ALBC member would not support passage of the ALBC 1% plan.
- 2. If the ADC 1% plan were introduced in the Legislature, would each member of the ALBC support its passage?
 - a. If not, please identify each member of ALBC who would not support its passage, and state the reasons such ALBC member would not support passage of the ADC 1% plan.

3. Does each member of the ALBC contend or hold the opinion that the ALBC 1% plan complies fully with the court's directive in its August 28, 2015 order filed as doc no. 283?
 - a. If not, please identify each member of the ALBC who does not contend or hold the opinion that the ALBC 1% plan complies with the court's order, and state the reasons for such contention or opinion.

4. Does each member of the ALBC contend or hold the opinion that the ADC 1% plan complies fully with the court's directives in its August 28, 2015 order filed as doc no. 283?
 - a. If not, please identify each member of the ALBC who does not contend or hold the opinion that the ADC 1% plan complies with the court's order, and state the reasons for such contention or opinion.

5. Does each member of the ALBC contend or hold the opinion that the ALBC 1% plan complies with the United States Constitution?
 - a. If not, please identify each member of the ALBC who does not contend or hold the opinion that the ALBC 1% plan complies with the United States Constitution, and state the grounds for such contention or opinion.

6. Does each member of the ALBC contend or hold the opinion that the ADC 1% plan complies with the United States Constitution?

- a. If not, please identify each member of the ALBC who does not contend or hold the opinion that the ADC 1% plan complies with the United States Constitution, and state the grounds for such contention or opinion.

7. Does each member of the ALBC contend or hold the opinion that the ALBC 1% plan complies with the Alabama Constitution?
 - a. If not, please identify each member of the ALBC who does not contend or hold the opinion that the ALBC 1% plan complies with the Alabama Constitution, and state the grounds for such contention or opinion.

8. Does each member of the ALBC contend or hold the opinion that the ADC 1% plan complies with the Alabama Constitution?
 - a. If not, please identify each member of the ALBC who does not contend or hold the opinion that the ADC 1% plan complies with the Alabama Constitution, and state the grounds for such contention or opinion.

9. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies with Section 2 of the Voting Rights Act?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with Section 2 of the Voting Rights Act, and state the grounds for such contention or opinion.

10. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies with Section 2 of the Voting Rights Act?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with Section 2 of the Voting Rights Act, and state the grounds for such contention or opinion.

11. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies with Section 5 of the Voting Rights Act?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with Section 5 of the Voting Rights Act, and state the grounds for such contention or opinion.

12. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies with Section 5 of the Voting Rights Act?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with Section 5 of the Voting Rights Act, and state the grounds for such contention or opinion.

13. State whether any member of ALBC contends or holds the opinions that any black-majority district in the ALBC 1% plan or the ADC 1% plan has an insufficient majority for black voters to elect their candidate of choice. If so,

identify each member of ALBC holding such contention or opinion and identify the plan and districts for which he or she holds such contention or opinion.

Respectfully submitted,

LUTHER STRANGE
Attorney General of Alabama

By:

s/ James W Davis _____
Andrew L. Brasher (ASB-4325-W73B)
Solicitor General
Megan Kirkpatrick (ASB-2652-M66K)
James W. Davis (ASB-4063-I58J)
Misty S. Fairbanks Messick
Assistant Attorneys General
Office of the Attorney General
State of Alabama
Post Office Box 300152
Montgomery, AL 36130-0152
Telephone: 334-242-7300
abrasher@ago.state.al.us
mkirkpatrick@ago.state.al.us
jimdavis@ago.state.al.us
mmessick@ago.state.al.us

John J. Park, Jr. (ASB-xxxx-P62J)
Deputy Attorney General
Strickland Brockington Lewis LLP
Midtown Proscenium Suite 2200
1170 Peachtree Street NE
Atlanta, GA 30309
Telephone: 678-347-2200
Fax: 678-347-2210
jjp@sblaw.net

Counsel for the State Defendants

David B. Byrne, Jr.
Legal Advisor to Governor Robert Bentley
Office of the Governor
Alabama State Capitol
600 Dexter Avenue, Suite NB-05
Montgomery, Alabama 36130
Telephone: 334-242-7120
Fax: 334-242-2335
david.byrne@governor.alabama.gov

Algert S. Agricola, Jr.
Ryals, Donaldson & Agricola, P.C.
60 Commerce Street, Suite 1400
Montgomery, Alabama 36104
Telephone: 334-834-5290
Fax: 334-834-5297
aagricola@rdafirm.com

Counsel for the State of Alabama and Governor Bentley

s/ Dorman Walker
Dorman Walker (ASB-0717-R81J)
Balch & Bingham LLP
Post Office Box 78
Montgomery, AL 36101-0078
Telephone: 334-834-6500
Fax: 334-269-3115
dwalker@balch.com

Counsel for Defendants-Intervenors Jim McClendon, Gerald Dial and Randy Davis

CERTIFICATE OF SERVICE

I hereby certify that, on September 29, 2015, I served the foregoing by electronic mail on the following counsel of record:

James U. Blacksher
Attorney at Law
Post Office Box 636
Birmingham, Alabama 35201
jblacksher@ns.sympatico.ca

William F. Patty
The Gardner Firm, P.C.
Post Office Box 991
Montgomery, Alabama 36101-0991
bpatty@thegardnerfirm.com

Edward Still
Edward Still Law Firm LLC
429 Green Springs Hwy, Ste 161-304
Birmingham, Alabama 35209
still@votelaw.com

Walter S. Turner
Walter S. Turner, Esq.
Post Office Box 6142
Montgomery, Alabama 36106
wsthayer@juno.com

U.W. Clemon
White Arnold & Dowd, P.C.
2025 Third Avenue North, Suite 500
Birmingham, Alabama 35203
uwclemon@whitearnolddowd.com

John K. Tanner
Attorney at Law
3743 Military Road, NW
Washington, DC 20015
john.k.tanner@gmail.com

James H. Anderson
Joel T. Caldwell
Copeland, Franco, Screws & Gill, P.A.
Post Office Box 347
Montgomery, Alabama 36101-0347
anderson@copelandfranco.com
caldwell@copelandfranco.com

Richard H. Pildes
40 Washington Square South
New York, NY 10012-1005

Joe M. Reed
Joe M. Reed & Associates, LLC
524 South Union Street
Montgomery, Alabama 36104
joemreed@wowway.net

s/ James W Davis
Of Counsel

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

ALABAMA LEGISLATIVE BLACK)	
CAUCUS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CASE NO. 2:12-CV-691
)	(Three-Judge Court)
v.)	
)	
THE STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Defendants.)	

ALABAMA DEMOCRATIC)	
CONFERENCE, <i>et al.</i> ,)	
)	
Plaintiffs,)	CASE NO. 2:12-CV-1081
)	(Three-Judge Court)
v.)	
)	
THE STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Defendants.)	

**Defendants’ Interrogatories and Requests for Production
to the ADC Plaintiffs**

Defendants, pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, propound the following interrogatories to the ADC Plaintiffs to be answered in accordance with the Rules and any applicable court orders:

Definitions

- A. The “**ALBC 1% Plan**” refers to that plan, including maps for both the House and Senate, submitted by the ALBC Plaintiffs in response to the Court’s order of August 28, 2015 (doc. 283).
- B. The “**ADC 1% Plan**” refers to that plan, including maps for both the House and Senate, submitted by the ADC Plaintiffs in response to the Court’s order of August 28, 2015 (doc. 283).

Interrogatories

- 1. If the ALBC 1% plan were introduced in the Legislature, would each member of the ADC support its passage?
 - a. If not, please identify each member of ADC who would not support its passage, and state the reasons such ADC member would not support passage of the ALBC 1% plan.
- 2. If the ADC 1% plan were introduced in the Legislature, would each member of the ADC support its passage?
 - a. If not, please identify each member of ADC who would not support its passage, and state the reasons such ADC member would not support passage of the ADC 1% plan.

3. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies fully with the court's directive in its August 28, 2015 order filed as doc no. 283?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with the court's order, and state the reasons for such contention or opinion.

4. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies fully with the court's directives in its August 28, 2015 order filed as doc no. 283?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with the court's order, and state the reasons for such contention or opinion.

5. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies with the United States Constitution?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with the United States Constitution, and state the grounds for such contention or opinion.

6. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies with the United States Constitution?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with the United States Constitution, and state the grounds for such contention or opinion.

7. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies with the Alabama Constitution?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with the Alabama Constitution, and state the grounds for such contention or opinion.

8. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies with the Alabama Constitution?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with the Alabama Constitution, and state the grounds for such contention or opinion.

9. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies with Section 2 of the Voting Rights Act?
 - a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with Section 2 of

the Voting Rights Act, and state the grounds for such contention or opinion.

10. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies with Section 2 of the Voting Rights Act?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with Section 2 of the Voting Rights Act, and state the grounds for such contention or opinion.

11. Does each member of the ADC contend or hold the opinion that the ALBC 1% plan complies with Section 5 of the Voting Rights Act?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ALBC 1% plan complies with Section 5 of the Voting Rights Act, and state the grounds for such contention or opinion.

12. Does each member of the ADC contend or hold the opinion that the ADC 1% plan complies with Section 5 of the Voting Rights Act?

- a. If not, please identify each member of the ADC who does not contend or hold the opinion that the ADC 1% plan complies with Section 5 of

the Voting Rights Act, and state the grounds for such contention or opinion.

13. State whether any member of ADC contends or holds the opinions that any black-majority district in the ALBC 1% plan or the ADC 1% plan has an insufficient majority for black voters to elect their candidate of choice. If so, identify each member of ADC holding such contention or opinion and identify the districts for which he or she holds such contention or opinion.
14. For each district in the ADC 1% Plan, House and Senate, please state the percentage of persons over the age of 18 who are black, according to the 2010 census data.
15. Please produce maps of the ADC 1% Plan, House and Senate, without overlays to any other plan.
16. Please produce a map of the ADC 1% Plan, House and Senate, showing the location of the residential addresses of persons who were members of the Legislature in 2012.
17. Please produce charts for the ADC 1% Plan, House and Senate, containing the information provided for the ALBC 1% Plan and submitted by the ALBC plaintiffs as exhibits APSX 633, 634, 635, 636 637, 638, and 639.

Respectfully submitted,

LUTHER STRANGE
Attorney General of Alabama

By:

s/ James W Davis
Andrew L. Brasher (ASB-4325-W73B)
Solicitor General
Megan Kirkpatrick (ASB-2652-M66K)
James W. Davis (ASB-4063-I58J)
Misty S. Fairbanks Messick
Assistant Attorneys General
Office of the Attorney General
State of Alabama
Post Office Box 300152
Montgomery, AL 36130-0152
Telephone: 334-242-7300
abrasher@ago.state.al.us
mkirkpatrick@ago.state.al.us
jimdavis@ago.state.al.us
mmessick@ago.state.al.us

John J. Park, Jr. (ASB-xxxx-P62J)
Deputy Attorney General
Strickland Brockington Lewis LLP
Midtown Proscenium Suite 2200
1170 Peachtree Street NE
Atlanta, GA 30309
Telephone: 678-347-2200
Fax: 678-347-2210
jjp@sblaw.net

Counsel for the State Defendants

David B. Byrne, Jr.
Legal Advisor to Governor Robert Bentley
Office of the Governor
Alabama State Capitol
600 Dexter Avenue, Suite NB-05
Montgomery, Alabama 36130
Telephone: 334-242-7120
Fax: 334-242-2335
david.byrne@governor.alabama.gov

Algert S. Agricola, Jr.
Ryals, Donaldson & Agricola, P.C.
60 Commerce Street, Suite 1400
Montgomery, Alabama 36104
Telephone: 334-834-5290
Fax: 334-834-5297
aagricola@rdafirm.com

Counsel for the State of Alabama and Governor Bentley

s/ Dorman Walker _____
Dorman Walker (ASB-0717-R81J)
Balch & Bingham LLP
Post Office Box 78
Montgomery, AL 36101-0078
Telephone: 334-834-6500
Fax: 334-269-3115
dwalker@balch.com

Counsel for Defendants-Intervenors Jim McClendon, Gerald Dial and Randy Davis

CERTIFICATE OF SERVICE

I hereby certify that, on September 29, 2015, I served the foregoing by electronic mail on the following counsel of record:

James U. Blacksher
Attorney at Law
Post Office Box 636
Birmingham, Alabama 35201
jblacksher@ns.sympatico.ca

William F. Patty
The Gardner Firm, P.C.
Post Office Box 991
Montgomery, Alabama 36101-0991
bpatty@thegardnerfirm.com

Edward Still
Edward Still Law Firm LLC
429 Green Springs Hwy, Ste 161-304
Birmingham, Alabama 35209
still@votelaw.com

Walter S. Turner
Walter S. Turner, Esq.
Post Office Box 6142
Montgomery, Alabama 36106
wsthayer@juno.com

U.W. Clemon
White Arnold & Dowd, P.C.
2025 Third Avenue North, Suite 500
Birmingham, Alabama 35203
uwclemon@whitearnolddowd.com

John K. Tanner
Attorney at Law
3743 Military Road, NW
Washington, DC 20015
john.k.tanner@gmail.com

James H. Anderson
Joel T. Caldwell
Copeland, Franco, Screws & Gill, P.A.
Post Office Box 347
Montgomery, Alabama 36101-0347
anderson@copelandfranco.com
caldwell@copelandfranco.com

Richard H. Pildes
40 Washington Square South
New York, NY 10012-1005

Joe M. Reed
Joe M. Reed & Associates, LLC
524 South Union Street
Montgomery, Alabama 36104
joemreed@wowway.net

s/ James W Davis
Of Counsel