

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

<b>ALABAMA LEGISLATIVE</b>	)	
<b>BLACK CAUCUS, et al.</b>	)	
	)	
<b>Plaintiffs</b>	)	
<b>v.</b>	)	<b>2:12-CV-00691-WKW-MHT-WHP</b>
	)	<b>(Three Judge Court)</b>
<b>THE STATE OF ALABAMA, et al.</b>	)	
	)	
<b>Defendants</b>	)	
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	)	
<b>DEMETRIUS NEWTON, et al.</b>	)	
	)	
<b>Plaintiffs</b>	)	
	)	
<b>vs.</b>	)	<b>2:12-CV-01081-WKW-MHT-WHP</b>
	)	<b>(Three Judge Court)</b>
<b>STATE OF ALABAMA, et al.</b>	)	
	)	
<b>Defendants</b>	)	

**NEWTON PLAINTIFFS’ RESPONSE TO THE STATE OF ALABAMA’S MOTION FOR SUMMARY JUDGMENT WITH RESPECT TO NEWTON PLAINTIFFS’ CLAIMS**

COME NOW, the Newton Plaintiffs, and respectfully file this Response to the State of Alabama’s Motion for Summary Judgment with Respect to Newton Plaintiff’s Claims. Specifically, the State of Alabama seeks summary judgment in their favor regarding claims by the Newton Plaintiffs alleging violations of Section 2 of the Voting Rights Act, unconstitutional gerrymandering, and violations of the 14<sup>th</sup> Amendment and the United States Constitution. The Newton Plaintiffs contend that said Motion should be DENIED as there exist genuine issues of material fact that should be addressed at trial. In support of the Newton Plaintiffs’ position, please refer to the Memorandum in Support of the Newton Plaintiffs’ Response to the State of Alabama’s Motion for Summary Judgment with Respect to Newton Plaintiffs’ Claims, filed contemporaneously herein.

**RESPECTFULLY SUBMITTED**, this 10th day of July, 2013.

/s/James H. Anderson

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 10, 2013, I electronically filed the foregoing document using the Court's CM/ECF system which will send electronic notification of such filing to all registered parties:

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