

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

ALABAMA LEGISLATIVE)	
BLACK CAUCUS, et al.,)	
)	
Plaintiffs,)	
)	
v.)	2:12-CV-691-WKW-MHT-WHP
)	(Three Judge Court)
THE STATE OF ALABAMA, et al.,)	
)	
Defendants.)	
<hr style="width: 30%; margin-left: 0;"/>)	
)	
ALABAMA DEMOCRATIC)	
CONFERENCE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	2:12-CV-1081-WKW-MHT-WHP
)	(Three Judge Court)
STATE OF ALABAMA, et al.,)	
)	
Defendants.)	

ADC RESPONSE TO ENACTED REMEDIAL HOUSE AND SENATE PLANS

The Alabama Democratic Conference (ADC) plaintiffs do not have any objections to file in response to the State’s remedial plans.

The State has redrawn all of the black-majority districts in Alabama. The new plans for both the House and Senate split significantly fewer counties and precincts, and reduce the black population percentages in the vast majority of the black-majority House and Senate districts, without compromising the ability of ADC members to elect representatives of their choice. *See* Doc. 345 (providing data). Upon final analysis of the State’s submissions, the ADC has concluded that the State has complied with the Supreme Court’s decision in this case, *Alabama Legislative*

Black Caucus v. Alabama, 135 S. Ct. 1257 (2015), with this court's decision on remand from the Supreme Court, and with the Supreme Court's applications of the *ALBC* decision this Term in *Bethune-Hill v. Virginia State Bd. of Elections*, 137 S. Ct. 788 (2017) and *Cooper v. Harris*, 137 S. Ct. 1455 (2017).

As a result, the ADC does not object to the new plans.¹

s/ Joel T. Caldwell

JOEL T. CALDWELL [ASB-4625-Z36E]
ROBERT D. SEGALL [ASB-7354-E68R]
COPELAND, FRANCO, SCREWS & GILL, P.A.
P. O. Box 347
Montgomery, AL 36101-0347
T (334) 834-1180 | F (334) 834-3172
caldwell@copelandfranco.com
segall@copelandfranco.com

RICHARD H. PILDES [MA BAR # 547625]
40 Washington Square South
New York, NY 10012-1005
pildesr@juris.law.nyu.edu

J. CECIL GARDNER
THE GARDNER FIRM, P.C.
210 South Washington Avenue
Mobile, AL 36602
T (251) 433-8100 | F (251) 433-8181
bpatty@thegardnerfirm.com

WALTER S. TURNER [ASB-6307-R49W]
P. O. Box 6142
Montgomery, AL 36106-0142
T (334) 264-1616; wsthayer@juno.com

JOHN K. TANNER [DC BAR # 318873]
3743 Military Road, NW
Washington, DC 20015
T (202) 503-7696; john.k.tanner@gmail.com

¹ ADC does not take any position on the Alabama Legislative Black Caucus objections to the remedial plans, which are based on the State's refusal to remove certain House and Senate districts from Jefferson County.

JOE M. REED [ASB-7499-D59J]
Joe M. Reed & Associates, LLC
524 S Union St.
Montgomery, AL 36104-4626
T (334) 834-2000 | F (334) 834-2088
joe@joereedlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 13, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

John J. Park, Jr.
Deputy Attorney General
Strickland, Brockington Lewis LLP
Midtown Proscenium Suite 2200
1170 Peachtree Street NE
Atlanta, GA 30309
T (678) 347-2200 | F (678) 347-2210
Email: jjp@sblaw.net

Andrew L. Brasher
James W. Davis
Misty S. Fairbanks Messick
Megan A. Kirkpatrick
Office of the Attorney General
State of Alabama
P.O. Box 300152
Montgomery, AL 36130-0152
T (334) 242-7300 | F (334) 353-8440
Email: abrasher@ago.state.al.us; jimdavis@ago.state.al.us; mmessick@ago.state.al.us
mkirkpatrick@ago.state.al.us

Bryan M. Taylor
OFFICE OF THE GOVERNOR
600 Dexter Avenue, Suite NB-05
Montgomery, AL 36130
T (334) 242-7120 | F (334) 242-2335
Email: david.byrne@governor.alabama.gov; pam.chesnutt@governor.alabama.gov

Algert S. Agricola, Jr.
RYALS, DONALDSON & AGRICOLA, P.C.
60 Commerce Street, Suite 1400
Montgomery, AL 36104
T (334) 834-5290 | F (334) 834-5297
Email: agricola@rdafirm.com; aandrews@rdafirm.com

Edward Still
429 Green Springs Hwy., Suite 161-304
Birmingham, AL 35209
T (205) 320-2882 | F (205) 320-2882
Email: still@votelaw.com

James U. Blacksher
P.O. Box 636
Birmingham AL 35201
T (205) 591-7238 | F (866) 845-4395
Email: jblacksher@ns.sympatico.ca

U.W. Clemon
5202 Mountain Ridge Parkway
Birmingham, AL 35222
T (205) 837-2898
Email: clemonu@bellsouth.net

J. Dorman Walker, Jr.
Louis M. Calligas
Balch & Bingham, LLP
P.O. Box 78
Montgomery, AL 36101-0078
T (334) 834-6500 | F (334) 269-3115
Email: dwalker@balch.com
lcalligas@balch.com

Joyce White Vance
829 Linwood Road
Birmingham, AL 35222
T (205) 305-9511
Email: joycevance4@gmail.com

s/ Joel T. Caldwell

OF COUNSEL