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

BOBBY SINGLETON, et al.,

Plaintiffs,

v.

WES ALLEN, in his official capacity as Alabama Secretary of State,

Defendant.

EVAN MILLIGAN, et al.,

Plaintiffs,

v.

WES ALLEN, in his official capacity as Alabama Secretary of State,

Defendant.

MARCUS CASTER, et al.,

Plaintiffs,

v.

WES ALLEN, in his official capacity as Alabama Secretary of State,

Defendant.

Case No. 2:21-cv-01291-AMM

THREE-JUDGE COURT

Case No. 2:21-cv-01530-AMM

THREE-JUDGE COURT

Case No.: 2:21-cv-1536-AMM

DEFENDANTS' RESPONSE TO THE SPECIAL MASTER'S STATEMENT OF FEES AND EXPENSES.

Defendants Secretary of State Wes Allen, Rep. Chris Pringle, and Sen. Steve Livingston do not object to the fees and expenses claimed by the Special Master and his demographer and counsel.

Defendants will consult with the Special Master's counsel on a proposed order that will require the payments to be made in a way that is both satisfactory to the Special Master and that complies with State administrative requirements. Defendants will submit a proposed order that meets these requirements no later than two weeks from today.

By not objecting to the fees and expenses of the attorneys representing the Special Master, Defendants do not concede that such hours or hourly rates would be appropriate for a party seeking fees under a fee-shifting statute.

Respectfully Submitted,

Steve Marshall Attorney General

/s/ James W. Davis

Edmund G. LaCour Jr. (ASB-9182-U81L) Solicitor General

James W. Davis (ASB-4063-I58J) Deputy Attorney General

Misty S. Fairbanks Messick (ASB-1813-T71F) Brenton M. Smith (ASB-1656-X27Q) Benjamin M. Seiss (ASB-2110-O00W) Charles A. McKay (ASB-7256-K18K) Assistant Attorneys General OFFICE OF THE ATTORNEY GENERAL STATE OF ALABAMA 501 Washington Avenue P.O. Box 300152 Montgomery, Alabama 36130-0152 Telephone: (334) 242-7300 Edmund.LaCour@AlabamaAG.gov Jim.Davis@AlabamaAG.gov Misty.Messick@AlabamaAG.gov Brenton.Smith@AlabamaAG.gov Ben.Seiss@AlabamaAG.gov Charles.McKay@AlabamaAG.gov

## Counsel for Secretary Allen

s/ Dorman Walker (with permission)
Dorman Walker (ASB-9154-R81J)
BALCH & BINGHAM LLP
Post Office Box 78 (36101-0078)
445 Dexter Ave., Suite 8000
Montgomery, AL 36104
Telephone: (334) 269-3138
Email: dwalker@balch.com

Michael Taunton (ASB-6853-H00S) BALCH & BINGHAM LLP 1901 6<sup>th</sup> Avenue North, Suite 1500 Birmingham, AL 35203 Telephone: 205 226-3151 Email: mtaunton@balch.com

Counsel for Sen. Livingston and Rep. Pringle

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2023, I filed the foregoing using the Court's CM/ECF system, which will serve all counsel of record.

/s/ James W. Davis Counsel for Secretary Allen