

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

EVAN MILLIGAN, SHALELA
DOWDY, LETETIA JACKSON,
KHADIDAH STONE, GREATER
BIRMINGHAM MINISTRIES, and
the ALABAMA STATE
CONFERENCE OF THE NAACP,

Plaintiffs,

vs.

WES ALLEN, in his official capacity
as Secretary of State of Alabama, and
STEVE LINGSTON and CHRIS
PRINGLE, in their official capacities
as Co-Chairs of the Alabama
Permanent Legislative Committee on
Reapportionment,

Defendants.

Case No.: 2:21-cv-1530-AMM

THREE-JUDGE COURT

**NOTICE AND/OR MOTION FOR LEAVE TO FILE PLAINTIFFS' FIRST
AMENDED COMPLAINT**

Plaintiffs respectfully give notice of their filing of their first amended complaint pursuant to Federal Rule of Civil Procedure 15(a)(2). Plaintiffs are amending their complaint to conform their allegations to Alabama's passage of SB 5, the State's purported remedial plan passed in the wake of the Supreme Court's order affirming this Court's judgment that Alabama's 2021 congressional

redistricting plan likely violated Section 2 of the Voting Rights Act. Plaintiffs amend their complaint with Defendants' express written consent.

Respectfully submitted,

DATED this 31st day of January 2023.

/s/ Deuel Ross

Deuel Ross*
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
700 14th Street N.W. Ste. 600
Washington, DC 20005
(202) 682-1300
dross@naacpldf.org

Stuart Naifeh*
Ashley Burrell*
Kathryn Sadasivan (ASB-517-E48T)
Brittany Carter*
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
(212) 965-2200
snaifeh@naacpldf.org

Shelita M. Stewart*
Jessica L. Ellsworth*
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, D.C. 20004
(202) 637-5600
shelita.stewart@hoganlovells.com

David Dunn*
HOGAN LOVELLS US LLP
390 Madison Avenue
New York, NY 10017
(212) 918-3000

/s/ Sidney M. Jackson

Sidney M. Jackson (ASB-1462-K40W)
Nicki Lawsen (ASB-2602-C00K)
WIGGINS CHILDS PANTAZIS
FISHER & GOLDFARB, LLC
301 19th Street North
Birmingham, AL 35203
Phone: (205) 341-0498
Fax: (205) 254-1500
sjackson@wigginschilds.com

/s/ Davin M. Rosborough

Davin M. Rosborough*
Julie Ebenstein*
Dayton Campbell-Harris*+
Sophia Lin Lakin*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad St.
New York, NY 10004
(212) 549-2500
drosborough@aclu.org
jebenstein@aclu.org
dcampbell-harris@aclu.org
slakin@aclu.org

/s/ Alison Mollman

Alison Mollman (ASB-8397-A33C)
AMERICAN CIVIL LIBERTIES UNION
OF ALABAMA
P.O. Box 6179
Montgomery, AL 36106-0179
(334) 265-2754

david.dunn@hoganlovells.com

amollman@aclualabama.org

Michael Turrill*
Harmony A. Gbe*
HOGAN LOVELLS US LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
(310) 785-4600
michael.turrill@hoganlovells.com
harmony.gbe@hoganlovells.com

Blayne R. Thompson*
HOGAN LOVELLS US LLP
609 Main St., Suite 4200
Houston, TX 77002
(713) 632-1400
blayne.thompson@hoganlovells.com

Attorneys for all Plaintiffs

Janette Louard*
Anthony Ashton*
Anna Kathryn Barnes*
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP)
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-5777
jlouard@naacpnet.org
aashton@naacpnet.org
abarnes@naacpnet.org

Attorneys for Plaintiff Alabama State Conference of the NAACP

* Admitted *Pro hac vice*

+ Practice limited to federal court