

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

MARCUS CASTER, LAKEISHA  
CHESTNUT, BOBBY LEE DUBOSE,  
BENJAMIN JONES, RODNEY ALLEN  
LOVE, MANASSEH POWELL,  
RONALD SMITH, and WENDELL  
THOMAS,

Plaintiffs,

v.

JOHN H. MERRILL, in his official  
capacity as Alabama Secretary of State,

Defendant,

and

CHRIS PRINGLE and JIM  
McCLENDON,

Intervenor-Defendants.

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

**CASTER PLAINTIFFS' RESPONSE TO COURT INQUIRY FOR  
REMEDIAL PROCEEDINGS**

In a post-hearing status conference held on January 28, 2022, this Court asked the parties to provide their assessment of the Court's proposed candidates for the role of Special Master, Richard F. Allen of Capell & Howard P.C., and the role of cartographer, Dr. Nathaniel Persily. The court would engage these individuals to

develop a remedial plan if the Alabama Legislature fails to draw a congressional map compliant with this Court's order enjoining HB 1. *See* ECF No. 101.

The *Caster* Plaintiffs consent to the Court's appointment of Mr. Allen and Dr. Persily. The *Caster* Plaintiffs believe that both Mr. Allen and Dr. Persily bring considerable complementary experience to the Court's process and would request that both serve a substantive role of equal weight and partnership in evaluating the parties' submissions and recommending a remedial map to the Court.

Dated: February 1, 2022

Respectfully submitted,

By /s/ Richard P. Rouco

By /s/ Abha Khanna

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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2022, a copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which will provide electronic notice of filing to all counsel of record.

/s/ Abha Khanna

Abha Khanna

Counsel for Plaintiffs

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