

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

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|------------------------------------|---|-----------------------------------|
| CARA McCLURE, et al., |) | |
| ALEXIA ADDOH-KONDI, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | Case No: 2:23-cv-00443-MHH |
| vs. |) | Case No: 2:23-cv-00503-MHH |
| |) | |
| JEFFERSON COUNTY COMMISSION |) | |
| et al., |) | |
| |) | |
| Defendants. |) | |

**ADDOH-KONDI PLAINTIFFS' REPLY BRIEF IN SUPPORT OF
THEIR MOTION FOR PRELIMINARY INJUNCTION**

The Addoh-Kondi Plaintiffs join the reply brief to be filed by the McClure Plaintiffs in these consolidated actions. The purpose of this additional reply is to alert the Court to the pendency of similar issues currently being addressed by Judge Manasco and the three-judge District Court in *Singleton v. Allen*, CA No. 2:21-cv-1291-AMM (N.D. Ala.).

The Defendants in the instant consolidated actions have adopted the same defensive strategy employed by the Alabama Attorney General in *Singleton*. They contend that perpetuating racially designed districts created decades ago for the purpose of complying with the Voting Rights Act, and which the Defendants maintained in 2021 without any analysis of whether they are still required by the

VRA, do not violate the Equal Protection Clause's prohibition of race-based redistricting simply because, Defendants say, they preserve the cores of existing districts and protect incumbents.

The briefs the McClure and Addoh-Kondi Plaintiffs have filed in opposition to Defendants' motion to dismiss and in support of their motions for preliminary injunction show that this defensive strategy squarely conflicts with controlling racial gerrymandering case law. In addition, for an even more extensive discussion of these issues, the Addoh-Kondi Plaintiffs would refer this Court to the findings of fact and conclusions of law filed by plaintiffs and defendants yesterday in *Singleton*. See Docs. 189 and 190 in CA No. 2:21-cv-1291-AMM.

Respectfully submitted this 22nd day of August, 2023.

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