

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

ALABAMA LEGISLATIVE BLACK \*  
CAUCUS; BOBBY SINGLETON; \*  
ALABAMA ASSOCIATION OF BLACK \*  
COUNTY OFFICIALS; FRED \*  
ARMSTEAD, GEORGE BOWMAN, \*  
RHONDEL RHONE, ALBERT F. \*  
TURNER, JR., and JILES WILLIAMS, JR., \*  
individually and on behalf of others \*  
similarly situated, \*

Plaintiffs,

v.

THE STATE OF ALABAMA; BETH \*  
CHAPMAN, in her official capacity as \*  
Alabama Secretary of State, \*

Defendants. \*

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DEMETRIUS NEWTON et al., \*

Plaintiffs, \*

v. \*

THE STATE OF ALABAMA et al., \*

Defendants. \*

Civil Action No.  
2:12-CV-691-WKW-MHT-WHP  
(3-judge court)

Civil Action No.  
2:12-cv-1081-WKW-MHT-WHP  
(3-judge court)

**SUMMARY OF TESTIMONY OF ALBC PLAINTIFFS' EXPERT  
WILLIAM S. COOPER**

Plaintiffs Alabama Legislative Black Caucus et al., through undersigned counsel, pursuant to ¶ 6 of the pretrial order entered July 16, 2013, Doc. 153, submit the following lay summary of the testimony of William S. Cooper:

1. Plaintiffs will move the admission of the declarations and expert report of Mr. Cooper previously filed. APX 1, 59, 69.

2. Mr. Cooper is an expert in drawing redistricting maps. He has testified at trial as an expert witness on redistricting and demographics in federal courts in 34 voting rights cases. Three of these lawsuits resulted in changes to statewide legislative boundaries, and approximately 25 of the cases led to changes in local election district plans.

3. Mr. Cooper will be asked to explain and demonstrate how he used the Maptitude For Redistricting software to draw the House and Senate plans in HB 16 and SB 5 and to analyze and display the plans in Acts 2012-602 and 2012-603. He will authenticate, and plaintiffs will move the admission of, the following maps and tables: APX 6, 7, 9-12, 15-59, 72-74, 76, 128-38.

4. Mr. Cooper will express the opinion that The arbitrary +/-1% deviation rule adopted by the Alabama Legislature results in numerous county, municipal, and precinct splits under the Act 602 and Act 603 legislative plans. These splits could be substantially reduced with the standard +/-5% deviation range. He

concludes that the Alabama Legislature placed undue importance on minimizing deviations in district population size under the Act 602 and Act 603 plans at the expense of other key redistricting criteria such as maintaining county integrity.

Respectfully submitted this 30<sup>th</sup> day of July, 2013.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2013, I served the foregoing on the following electronically by means of the Court's CM/ECF system:

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s/ James U. Blacksher

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