

IN THE
Supreme Court of the United States

WES ALLEN,
ALABAMA SECRETARY OF STATE, ET AL.,
Applicants,
v.

EVAN MILLIGAN, ET AL.,
Respondents.

**On Application for Stay Pending Appeal from the U.S. District Court from
the Northern District of Alabama**

**BRIEF OF *AMICI CURIAE* CURRENT AND FORMER ELECTION
ADMINISTRATION OFFICIALS AND ELECTION EXPERTS IN SUPPORT
OF RESPONDENTS**

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INTEREST OF AMICI CURIAE¹

Amici are current and former election professionals with substantial experience administering elections throughout the country, as well as scholars of election administration. They are registered Republicans, Democrats, and Independents. Given their expertise, *amici* are well positioned to bring to the Court’s attention relevant evidence and analysis on the impact of election changes to the conduct of elections and the franchise. Based on that experience, they conclude that Alabama elections officials will face unprecedented and extraordinary challenges if this Court were to stay the district court’s injunction and direct the State to implement the 2023 Map. Those challenges will almost certainly lead to widespread confusion, substantial mistakes in voter reassignments, and votes of eligible voters not being counted.

SUMMARY OF ARGUMENT

Applicants ask this Court to grant emergency interlocutory relief in order to implement a congressional plan (the “2023 Plan” or “2023 Map”) that the district court has found, twice and after separate and fulsome development of the record, to be unlawful. *Amici* respectfully urge the Court to deny Applicants’ application based on the likelihood that the 2023 Plan cannot properly or effectively be implemented within the necessary timeframe.

¹ Pursuant to Supreme Court Rule 37.6, undersigned counsel certifies that no counsel for a party authored this brief in whole or in part, and no person or entity other than the *amici curiae* and its counsel made a monetary contribution to the preparation or submission of this brief.

Applicants asked this Court for a ruling by 10:00 a.m. on June 1 without explaining why they picked that date. As the record in the district court’s May 22 hearing confirms, Alabama knows that, in order to change from the court-ordered map created by a special master, which governed the entirety of the 2024 election and the recently concluded 2026 primary election in Alabama (“Special Master Plan” or “2024 Map”), to the 2023 Map, election administrators will need to reassign voters to different precincts than they are currently assigned. However, that voter reassignment, which normally takes three to four months, must be completed by June 2. *See Transcript of May 22, 2026 Preliminary Injunction Hearing (“Tr. App.”)*, 139:8-14; 163:2-4. Accomplishing voter reassignments within that window of time is not merely an administrative inconvenience; it is a mad scramble across forty of Alabama’s sixty-seven counties, using a map that has never been administered, on a timeline unprecedented in the state’s redistricting history. And because the reassignment process could not begin before May 27, nor could it occur while the injunction was in place, election administrators would have at most one business day to accomplish this massive undertaking. Election Registrars, who often work part-time, are mainly responsible for making changes to voter records and, in this case, would have to complete a multi-step process in which one missed deadline could easily cascade into mistakes at subsequent steps.

Yet Applicants’ application does not speak to any of these logistical and administrative details, making no mention of the June 2 deadline and failing to describe what the reassignment requires, or come to grips with what happens if this

Court issues a stay after June 2. It asks this Court to dismiss the challenges caused by forcing implementation of the 2023 Map as mere “logistical advantages” that *Purcell v. Gonzalez*, 549 U.S. 1, 4-5 (2006) (per curiam), prevents a court from weighing. *Allen v. Milligan*, No. 25A1314, Emergency Application for Stay (May 27, 2026) at 33-34 (“Appl.”). That framing is wrong. The record is clear that a stay of the injunction would create major risks of large-scale errors, inaccuracies, or voter disenfranchisement: erroneous ballots provided to voters, votes of eligible voters not being counted, and a logistical nightmare for administrators asked to meet a virtually impossible timeline, while simultaneously managing a June 16 primary runoff, absentee voting for the August 11 primary election in four congressional districts beginning on June 17, and a federal deadline of June 27 to send ballots to military and overseas absentee voters. *Amici* urge the Court to consider these threats to election integrity and irreparable harm to voters and deny Applicants’ request for an emergency stay.

PROCEDURAL AND FACTUAL BACKGROUND

I. Five Years of Litigation and the Special Master Plan

The origins of this litigation date back to November 2021, when lawsuits were filed challenging Alabama’s 2021 congressional redistricting plan following the 2020 Census. In January 2022, a unanimous three-judge district court found plaintiffs substantially likely to prove a Section 2 violation, concluding it was not a “close” call, and entering an injunction that stopped implementation of the 2021 map. *Milligan v. Allen*, No. 2:21-cv-1530-AMM, Doc. 107 at 214 (N.D. Ala. Jan. 24, 2022). This Court,

after initially staying the injunction, affirmed it in June 2023. *Allen v. Milligan*, 599 U.S. 1 (2023).

Alabama then enacted the 2023 Map, which, like the previous 2021 plan, included only one Black-opportunity district. The district court issued a preliminary injunction enjoining the 2023 Map in August 2023 and appointing a Special Master to draw a remedial plan (the Special Master Plan). Alabama sought a stay of that preliminary injunction from this Court, which was denied with no noted dissents, *Allen v. Milligan*, 144 S. Ct. 476 (2023) (mem.), and the Special Master’s 2024 Map governed Alabama’s 2024 congressional elections without incident. *Milligan v. Allen*, No. 2:21-cv-1530 (N.D. Ala. May 26, 2026), Doc. 537, at 17 (“Op.”). The Secretary of State’s office planned to use the same map for the 2026 primary. During the period from January to May 19, 2026, all voters were assigned to precincts pursuant to the 2024 Map, and all 2026 absentee ballots were prepared under it. (Tr. App. 134:23-25); (Tr. App. 135:2-10).

In May 2025, after an eleven-day trial—with twenty-three witnesses, thirteen experts, and more than 790 exhibits—the district court issued a permanent injunction finding the 2023 Plan violated both Section 2 of the Voting Rights Act and the Fourteenth Amendment’s intentional discrimination standard. Op. at 19-21. On May 11, 2026, this Court vacated that injunction and remanded in light of *Louisiana v. Callais*, 146 S. Ct. 1131 (2026). On May 26, 2026, after a full evidentiary hearing, the district court issued a preliminary injunction again enjoining the 2023 Map,

finding that, under *Callais*, the 2023 Map still violated Section 2 and the Constitution. Op. at 29, 43-44.

II. The Electoral Calendar

The following dates and events provide context for and define the window within which voter reassignments back to the 2023 Map, should the Court so order, must occur.

- **January 2026:** Candidates qualified for all congressional races under the 2024 Map. Op. at 25.
- **March 2026:** Candidates certified. Absentee balloting began. Op. at 25.
- **May 11, 2026:** This Court vacated the permanent injunction one week before primary day, May 19. Alabama Governor Kay Ivey subsequently issued a proclamation voiding the May 19 congressional primary election in Districts 1, 2, 6, and 7, and calling a special congressional primary for those districts on August 11. Special Primary Proclamation (Kay Ivey, Governor) (May 12, 2026), <https://governor.alabama.gov/wp-content/uploads/2026/05/Special-Primary-Proclamation.pdf>.
- **May 12–22, 2026:** Candidates qualified for the August 11 special primary under the 2023 Plan. Some switched districts and must refile campaign committee documents with the Secretary of State’s office. (Tr. App. 127:5-14).
- **May 19, 2026:** Statewide primary proceeded in fractured form. Districts 3, 4, and 5 selected congressional nominees under the Special Master Plan.

- **May 19–26, 2026:** Voter rolls were locked for post-election processing—during which election officials updated voter history and linked voting records to participants following the May 19 primary election—meaning that no changes to voter district assignments can be made in the registration database. No redistricting changes were possible during this period. (Tr. App. 123:3-9); Op. at 8.
- **May 22, 2026:** District court held evidentiary hearing. Alabama Director of Elections Jeff Elrod testified about the operational requirements of each map.
- **May 26, 2026:** District court issued 102-page preliminary injunction maintaining the 2024 Map.
- **May 27, 2026:** Alabama filed an emergency stay application with Justice Thomas, requesting a ruling by 10:00 a.m. on June 1. Justice Thomas did not grant an administrative stay but ordered Respondents to file a response by 4:00 p.m. on June 1. Because of the district court’s injunction, Alabama has not proceeded with the voter reassignment process. Before the district court issued its injunction, this was the first day the voter reassignment process could begin—a process which, as noted below, would have to end six days later, by June 2. However, due to the injunction, the state could not—and has not—reassigned any voters.
- **June 1, 2026, 4:00 p.m. EDT:** Respondent’s brief is due. Five of the possible six voter reassignment days, starting from May 27, have elapsed with no reassignment begun under the 2023 Plan.

- **June 2, 2026:** Voter rolls will lock again, this time for the June 16 runoff, since this is the “first day for absentee voting for the June 16th runoff.” (Tr. App. 139:8-14); (Tr. App. 179:12-14). Per Director Elrod’s testimony, when absentee ballots begin to be assigned for the June 16 runoff, the voter list in the Election Navigator system locks automatically. (Tr. App. 139:8-14); (207:19-25) (“when you begin assigning absentee ballots for an election for a jurisdiction, that causes the list to be locked down”). Director Elrod testified that “[w]henver you have an election that’s built in the Election Navigator system, when you begin assigning absentee ballots for an election for a jurisdiction, that causes the list to be locked down. But June 2nd is the date that we now have from ES&S [Election Systems & Software, the vendor managing the Election Navigator] as a date on which the voter list is going to be locked down.” (App. 207:19-25). The June 16 runoff includes statewide races—including the Republican and Democratic nominees for U.S. Senate, and the Republican primaries for Lieutenant Governor and Attorney General—making the lock universal across all sixty-seven counties. CAMPAIGN 2026: List of runoff races for June 16, WAKA Action 8 News, May 20, 2026, <https://www.waka.com/2026/05/20/campaign-2026-list-of-runoff-races-for-june-16/>; (Tr. App. 199:3-10). June 2 is therefore the hard outer deadline for all voter reassignment. The window closes regardless of what this Court decides.

- **June 16, 2026:** Primary runoff for all races from the May 19 primary in which no candidate received more than 50% of the vote. (Tr. App. 138:16-17).
- **June 17, 2026:** Absentee voting begins for the August 11 special primary for Districts 1, 2, 6, and 7. As a matter of law, all voter assignments and ballots must be final by June 17; as noted above, voter rolls must be locked by June 2, and cannot be reopened before June 17, meaning that for the August 11 primary election, no voter reassignments can occur after June 2. (Tr. App. 136:14-18). *See also* Ala. Code § 17-11-12 (requiring ballots to be delivered to the absentee election managers in the counties by 55 days before an election, which is June 17 for the August 11 primary).
- **June 27, 2026:** Federal deadline: under the Uniformed and Overseas Citizens Absentee Voting Act (“UOCAVA”), overseas and military absentee ballots for August 11 must be sent by this date. 52 U.S.C. § 20310; (Tr. App. 128:6-12).
- **August 11, 2026:** Special primary for Districts 1, 2, 6, and 7. This date cannot be moved, as doing so would conflict with the November 3 general election. (Tr. App. 127:15-20).
- **November 3, 2026:** General election.

Granting a stay of the district court’s injunction means that election administrators in Alabama would have the unprecedented task of reassigning all impacted voters into the adjusted 2023 Map districts within at most one business day, and likely less—while simultaneously managing other ongoing pressing tasks, including the upcoming June 16 primary runoff.

ARGUMENT

I. It Is Now Virtually Impossible to Administer the Changes Necessary to Implement the 2023 Map

Amici respectfully urge this Court to confront the threshold problem at the heart of Alabama’s application: Alabama, in asking for a ruling by June 1 without explaining why that date matters, did not disclose that, per the testimony of the state’s Director of Elections, voter reassignment for the primary runoff must occur by June 2, and did not explain what relief is even viable, never mind what it is seeking, if that window closes before the Court acts.

Applicants do appear to be aware of the importance of the June 2nd deadline, having asked this Court to rule by 10:00 a.m. on June 1 “or as soon as possible thereafter.” But Applicants do not say why, nor do they provide any of the facts necessary—including the voter reassignment window or absentee voting date—to understand the practical implications of their request. Notably, these are facts Alabama’s own Director of Elections provided on the record during the May 22 district court hearing. Instead of meaningfully addressing these facts in its petition to this Court, Applicants invoke their view of the equities in a single sentence: “voters will be forced to vote under a court-drawn racially gerrymandered map.” Appl. at 35. They point to no evidence that a stay is operationally feasible, do not reference the relevant deadlines, and provide no explanation of what election officials would do if a stay arrived after June 2.

As of June 1, election officials will have already lost five of the six days of the voter reassignment window. The process that would need to be completed for

reassignment requires three sequential steps—pre-review, changes, and quality checks—each of which must be completed before the next election begins. (Tr. App. 140:14-25). In 2017, when only a portion of some districts were affected by a remedial redistricting, local officials still “struggled to complete the district assignment process in up to *four months*.” (Tr. App. 163:2-4) (emphasis added). If Applicants’ request is granted, election officials would have, at most, one full business day to complete this process.

II. The Voter Reassignment Process

Applicants’ brief sweeps aside the voter reassignment process in just three sentences: most counties can do a “mass change,” the three split counties can complete their assignments “in time,” and Alabama “has the tools and capacity to accomplish the reassignment process.” Appl. 7-8. But this omits the overwhelming majority of the facts relevant to implementing the 2023 Map, as set forth, most notably, in Director Elrod’s extensive testimony. That information affirms the impracticality of Applicants’ request and the undue burden and high risk of error a stay would create.

A. The Steps of the Voter Reassignment Process

As the calendar above makes clear, the underlying record indicates that any voter reassignment associated with implementing the 2023 Maps for the August 11 primary must be completed by June 2. As Director Elrod testified “[n]o person has ever voted under the 2023 plan” and the “Secretary of State’s office has never conducted an election under the 2023 plan.” (Tr. App. 134:4-8). The 2024 Special

Master Plan, by contrast, has governed multiple election cycles—both the 2024 primary and general elections, as well as the May 19, 2026 primaries for Districts 3, 4, and 5. Voter assignments for that map are already loaded in every county’s election management system. “Retaining the Special Master map involves no voter reassignment.” (Tr. App. 142:6-8). For election officials, administering the August 11 primary elections under the 2024 Map would require no additional actions in their existing systems. Administering it under the 2023 Plan means completing the following processes before June 2.

i. Receiving and Loading the District Files

When a new congressional map is enacted, “the state sends the new map’s files and legal descriptions of the districts to registrars to begin the reassignment process.” (Tr. App. 154:11-14). The state’s Geographic Information System (“GIS”) vendor, Keet’s Consulting Services (“KCS”), must prepare and distribute updated shapefiles to the approximately forty to forty-two counties it serves. (Tr. App. 117:1-7). A shapefile is “an electronic form of mapping” that “displays the boundaries” of each district and allows county officials to “easier see the addresses.” (Tr. App. 124:5-9). Registrars must receive these files, verify them, and load them before any voter reassignment can begin.

Applicants point to GIS as evidence that the process is manageable. *See* Appl. at 7. But Director Elrod explains what GIS actually does: it “is *not moving* any voters. GIS is identifying *where* those voters would be. The registrars are then making sure that the assignments are made according to the map. GIS is just an electronic

interactive mapping feature that allows them to easier see the addresses.” (Tr. App. 148:5-9) (emphasis added). It therefore does not automate or accelerate the actual reassignment; it functions as a pre-review. Indeed, “[i]f bad information is put into GIS, the GIS output is unreliable.” (Tr. App. 149:12-14). The technology identifies where changes need to be made, but it does not make them itself.

B. Voter Reassignment

After GIS identifies all relevant voters, those voters’ assignments must be changed to comport with the new map. For counties that move entirely from one district to another, the registrar can perform a “mass change” in the Election Navigator program, simultaneously reassigning all voters in the county. (Tr. App. 120:19-23). But such a mass change is available only “if everybody is moving to the same location.” (Tr. App. 156:12-14). Any time a county is split between districts, rather than moving whole, there is no mass change option. (Tr. App. 156:1-5) (“For any county that has a split of *any* kind, there’s no mass change option available in GIS” when “the changes are at the precinct level”) (emphasis added). “Any time there is any precinct split, you have to go precinct part by precinct part and add street segment by street segment.” (Tr. App. 156:6-8).

There are three counties—Jefferson, Elmore, and Covington—that split differently in the 2023 Map from the boundaries in the 2024 Map. These counties require “more intentional and manual work on behalf of the registrars. Instead of a mass change, they have to then go in to these political subdivisions at a more granular

level, and it requires ensuring that these splits are accurate. It requires review. It requires a more hands-on process.” (Tr. App. 122:1-7).

Elmore and Covington Counties each have “just three registrars in their offices, so the manual hours is [*sic*] a little more demanding on them than it would be an office that has staff.” (Tr. App. 122:18-25). While Jefferson County has a larger staff and GIS, which would be “a helpful resource in at least initiating the changes,” “there will still be manual hours spent making sure that these splits are correct and accurate.” (Tr. App. 122:14-16). Regardless of county type, the system “still requires manual input. The registrars, probate judges, absentee managers, they have to physically manually interface with the system. The system is not automatic.” (Tr. App. 146-14-17). If this Court stays the district court’s injunction, those staffers will have at most one business day, and likely less, to make every adjustment and ensure that they are correct.

C. Quality Checks and Verification

After reassignments are entered, registrars must verify accuracy through mandatory quality checks. “If one deadline is missed, then that’s setting up the county to be unprepared for the next step of their process.” (Tr. App. 140:14-25); *See also* (Tr. App. 141:1-4).

Accuracy matters because “the only way that voters will receive correct ballots is if the different combinations of the districts assign the correct ballot style.” (Tr. App. 154:18-21). Wrong-ballot errors are not hypothetical. Director Elrod reported

that errors that have occurred in the past “include[d] providing some voters with ballots for the wrong district.” (Tr. App. 141:8-12).

i. **Ballot Preparation, Poll Book Loading, and Voter Notification**

Voter reassignment is not the end of the process. It triggers other tasks that must be completed before absentee voting begins on June 17 for the August 11 primary. Director Elrod testified about those tasks and their typical timing in the district court:

- **Ballot printing.** “Vendors are working on printing ballots for at least a couple of months.” (Tr. App. 160:15-16). The candidate qualifying deadline is typically 116 days before an election; here, it was 82 days before August 11, already 34 days compressed below the normal baseline. (Tr. App. 165:15-25). Ballots cannot be laid out until the reassignments are completed, and the ballots must be delivered to absentee ballot managers on June 17. Even if the voter reassignment was completed by June 2, election administrators would still only have 15 days to design, print, and deliver ballots, instead of 116.
- **Poll books.** “The voter list is usually exported from Election Navigator and then loaded into electronic poll books around 10 days before the election.” (Tr. App. 145:17-20). Those books must reflect correct district assignments or voters will be directed to the wrong precincts.
- **Voter notification.** Registrars must “notify voters of their assigned precincts and districts well before the beginning of absentee voting to allow voters time to know what their choices are and inform themselves about those choices.”

(Tr. App. 159:11-14). Alabama Code Section 17-6-4(d) prohibits “adjusting precinct boundaries or designating additional voting places within three months of an election.” (Tr. App. 165:4-7). “The closer to an election that you wait to notify voters of changes, the likelihood of more confusion being created is higher.” (Tr. App. 165:8-11).

- **Absentee voting timing.** Absentee voting begins June 17, leaving an exceedingly narrow time frame—between two-three weeks—in which all of the above must be completed for Districts 1, 2, 6, and 7. In a declaration, Former Director of Elections Clay Helms stated that, in a previous election cycle, December 21, 2021, was “too late a date for redistricting because absentee voting was set to begin in a little over three months.” Declaration of Clay Helms ¶ 2, *Milligan* Doc. 82-7. Director Elrod agreed with that assessment. (Tr. App. 159:2-9).
- **UOCAVA ballots.** Federal law requires overseas and military ballots to be sent no later than the 45th day before the election; in this instance, that would be June 27 for the August 11 primary date. (Tr. App. 128:6-12).

Director Elrod confirmed that the August 11 primary election date cannot be moved “[b]ecause that would begin to conflict with the general election that is scheduled for November 3rd.” (Tr. App. 127:15-20).

D. The State Apparatus Appears to be Too Small to Absorb the Burden

Applicants’ brief implies that vendor support and technology make the timeline workable. However, the underlying record and testimony indicates the opposite. As

outlined above, technological support—such as GIS and Election Navigator—cannot make all the necessary changes to voter reassignment on their own. It requires manual input from election administrators.

The Secretary of State’s elections division employs five individuals: four staff and Director Elrod himself. (Tr. App. 150:10-11). The Secretary’s office “doesn’t hire temporary employees to help with election administration” because “[t]he secretary’s office doesn’t have the ability to hire temporary employees, as needed, for time-sensitive matters.” (Tr. App. 151:2-7).

At the county level, outside contractors require county commission approval and a formal agreement before they can be engaged—a process that itself consumes time. (Tr. App. 150:18-25). And even with outside help, “registrars are the only ones who can make the changes in Electronic Navigator to a voter’s record.” (Tr. App. 148:18-22). Some registrars are in their offices one or two days per week depending on their shifts. (Tr. App. 164:14-16). Most are “not tech savvy.” Indeed, as Director Elrod explained, “[e]ven experienced registrars are only familiar with the software to an extent.” (Tr. App. 147:3-8). For the reassignment, he cautioned, “all officials will take it slowly to ensure accuracy.” (Tr. App. 147:9-11). Putting those officials into an unreasonably and unnecessarily tight window to make these changes almost guarantees errors.

Compounding these challenges is the fact that some of these election officials have never done this work before. As Director Elrod pointed out, “[r]edistricting and reassignment is not something these election officials do every cycle.” Because

redistricting is not done every cycle, “the officials who are tasked with the reassignments may have never been through a redistricting process before.” (Tr. App. 144:5-17). Moreover, due to personnel turnover, “[n]ew staff might be less familiar with the process that happened a few years ago.” (Tr. App. 144:5-17). And even experienced officials will need “additional support and guidance from the secretary.” (Tr. App. 144:18-20). Meanwhile, election officials must simultaneously manage all of their other legally mandated duties. (Tr. App. 143:1-4). In short, election and county officials would face unprecedented and virtually insurmountable obstacles to properly administer the election.

E. The Historical Baseline: Three-to-Four Months Is the Normal Timeline

To understand the implications of this compressed timeline, *amici* urge the Court to consider the normal timeline, as was presented to the district court. Former Director of Elections Clay Helms stated in a declaration that “reassignment can take three to four months for the counties’ board of registrars to complete.” (Tr. App. 158:19-22). For example, Director Elrod agreed with Mr. Helms’s prior assessment that, in a previous cycle, December 21, 2021 was too late to redistrict because absentee voting would begin in three months. (Tr. App. 159:2-6). In 2017, when only some districts were affected by a remedial redistricting order, “local election officials struggled to complete the district assignment process in up to four months.” (Tr. App. 163:2-4). Director Elrod confirmed this remains true, testifying that “redistricting of any kind or reassignment of any kind is still a tedious process for registrars.” (Tr. App. 163:8-10).

Allowing the district court’s injunction against the 2023 Plan to remain would avoid that disruption, because, as Director Elrod acknowledged, “[r]etaining the Special Master map involves no voter reassignment.” (Tr. App. 142:6-8).

F. The Balance of Harms Weighs Against Issuing a Stay

The district court identified five public-interest reasons supporting the injunction, each firmly grounded in the evidentiary record. Op. at 72-74. The most pressing is the operational one: the voter reassignment window necessary to implement the 2023 Map effectively closes tomorrow, June 2, the three-to-four-months normal reassignment timeline cannot be compressed into the remaining time. Against this, Alabama asserts a sovereign interest in using its enacted plan. The district court held that “in a contest between irreparable harm to voters’ right to participate in the political process under a constitutional districting plan, and irreparable harm to the State’s interest in using its legislatively enacted plan, we must give greater weight to preventing the irreparable injury to voters’ constitutional rights.” Op. at 71.

CONCLUSION

Amici believe that the logistical hurdles posed by this Court granting a stay would be unusually onerous. The myriad operational challenges would create a high likelihood of significant error, fail to count eligible votes, and cause mass confusion in the administration of the election. Therefore, *amici* respectfully request the Court deny Applicants’ application for a stay of the district court’s injunction.

Respectfully submitted,

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APPENDIX – LIST OF *AMICI CURIAE*

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- **Tommy Gong** – County Clerk for Lane County, Oregon; Former Chief Deputy County Clerk-Recorder for Contra Costa County, California; Former Elected County Clerk-Recorder for San Luis Obispo County, California.
- **Scott O. Konopasek** – Electoral Board Member for Hanover County, Virginia; Former General Registrar and Director of Elections for Fairfax County, Virginia; Former Election Director for Contra Costa County, California.
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