



## AlaFile E-Notice

03-CV-2008-900749.00

To: NEAL ALLISON EICHENFED  
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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

DONNA BAKER ET AL v. BETH CHAPMAN ET AL  
03-CV-2008-900749.00

The following discovery was FILED on 8/8/2008 3:35:27 PM

Notice Date: 8/8/2008 3:35:27 PM

**MELISSA RITTENOUR**  
**CIRCUIT COURT CLERK**  
MONTGOMERY COUNTY, ALABAMA  
251 S. LAWRENCE STREET  
MONTGOMERY, AL 36102

334-832-4950



**IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA**

DONNA BAKER, et al.,

Plaintiffs,

v.

BETH CHAPMAN, et al.,

Defendants.

Civil Action No.

03-CV-2008-900749.00

**NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION  
AND NOTICE DUCES TECUM**

Please TAKE NOTICE that, pursuant to Alabama Rule of Civil Procedure Rule 30, commencing at 9:00 AM on Tuesday, August 19, 2008, or at an alternative date and time as agreed to by the parties or as ordered by the Court, in the offices of Copeland, Franco, Screws & Gill P.A., located at 444 South Perry Street, Montgomery, Alabama, the Plaintiffs in the above-styled case will take the stenographic and/or videographic deposition before a court reporter and a Notary Public of the following witnesses:

1. Defendant NELL HUNTER.
2. The Rule 30(b)(6) designated agent or agents of the Secretary of States office who have the most knowledge of (a) the policies, procedures, and opinions of the Secretary of State's Office related to the registration of elector applicants who have criminal convictions; (b) instructions given by the office to registrars about elector applicants who have criminal convictions; and (c) communications with the Attorney General's office about elector applicants who have criminal convictions.
3. Ed Packard.

Deponents are requested to bring with them the following documents:

1. Any and all documents, including but not limited to operating instructions, memoranda, recommendations, guidelines, employee training documents, correspondence, emails, and other forms of communication exchanged between any Defendant and any and all Boards of Registrars, or individual registrars, regarding the registration of elector applicants who have criminal convictions.

2. Any and all documents, including but not limited to advisory opinions, memoranda, recommendations, guidelines, employee training documents, correspondence, emails, and other forms of communication exchanged between Defendants and the Attorney General's office regarding the registration of elector applicants who have criminal convictions.

3. Any and all documents, including but not limited to advisory opinions, recommendations, guidelines, employee training documents, correspondence, emails, and other forms of communication exchanged between the Attorney General's office and any and all Boards of Registrars regarding the registration of elector applicants who have criminal convictions.

4. Any and all documents showing the name and race of all persons disfranchised for reason of criminal conviction, and the offenses for which the individuals were disfranchised.

This oral examination will begin at a time and place stated above and continue until completed with such adjournments as to time and place as may be necessary.

Date: August 8, 2008

Respectfully submitted,

s/ Allison E. Neal  
Allison E. Neal  
American Civil Liberties Union of Alabama Foundation  
207 Montgomery Street, Suite 910  
Montgomery, Alabama 36104  
Tele: 334-265-2754 x203

Fax: 334-269-5666  
anaclual@bellsouth.net

s/ Robert D. Segall

Robert D. Segall  
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s/ Laughlin McDonald

Laughlin McDonald\*  
Neil Bradley\*  
Nancy G. Abudu\*  
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*\*Admitted pro hac vice*

ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 8th day of August, 2008, an accurate and complete copy of the Plaintiff's Notice To Take Deposition Upon Oral Examination and Notice Duces Tecum was sent via electronic mail to the following counsel for Defendant Beth Chapman:

Jim Davis, Office of the Attorney General, jimdavis@ago.state.al.us.

I further certify that on this the 8th day of August, 2008, an accurate and complete copy of the Plaintiff's Notice To Take Deposition Upon Oral Examination and Notice Duces Tecum was sent via First Class pre-paid U.S.P.S. mail to the following individuals:

Beth Chapman, Alabama Secretary of State, P.O. Box 5616, Montgomery, Alabama 36103-5616;

Jim Davis, Office of the Attorney General, Alabama State House, 11 South Union Street, Third Floor, Montgomery, AL 36130;

Nell Hunter, Registrar for Jefferson County, 716 Richard Arrington Jr Blvd N Ste A-410, Birmingham, Alabama 35203-0115;

M. David Barber, Jefferson County District Attorney, 801 Richard Arrington Jr. Boulevard North, Suite L-01, Birmingham, AL 35203;

Jean Kirkland, Registrar for Monroe County, P.O. Box 972, Monroeville, Alabama 36461-0972;

Beatrice Rogers, Registrar for Monroe County, P.O. Box 972, Monroeville, Alabama 36461-0972;

Donna Jordan; Registrar for Monroe County, P.O. Box 972, Monroeville, Alabama 36461-0972; and

Tommy Chapman, Monroe County District Attorney, P.O. Box 397, Monroeville, AL 36461-0397.

s/ Allison E. Neal  
Allison E. Neal