

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

DORIS POWELL, )  
)  
Plaintiff, )  
)  
v. )  
)  
THE STATE OF ALABAMA; )  
JEFFERSON COUNTY ELECTION )  
COMMISSION; ALAN KING, MIKE )  
HALE, and ANNE-MARIE ADAMS, )  
in their official capacities as members )  
of the Jefferson County Election )  
Commission, )  
)  
Defendants. )

**CIVIL ACTION NO. 2:08-cv-01345-LSC**

**WLLIAM A. BELL'S ANSWER**

COMES NOW William A. Bell ("Bell") and hereby answers each and every allegation in Plaintiff's Complaint, following the organizational structure thereof:

1. Bell admits the nature of the action as set forth in the first sentence of ¶1 of the Complaint. The Remainder of the paragraph is a legal conclusion which requires no answer from Bell.

**Parties**

- 2. Admitted.
- 3. Admitted.
- 4. Admitted.

**Facts**

- 5. Admitted.
- 6. Admitted.

7. Admitted

8. Admitted

9. Admitted

10. Admitted

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted

15. Bell admits that defendants have complied with the February 14, 2008, injunction of the Supreme Court of Alabama. The remainder of ¶ 15 of the Complaint is a legal conclusion which requires no answer from Bell.

16. Admitted.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

23. Admitted.

24. ¶ 24 of the Complaint is a legal argument which requires no answer from Bell.

25. Denied

## Claims

26. ¶ 26 of the Complaint is a legal argument which requires no answer from Bell.

### Prayer for Relief

Bell denies that Plaintiff is plaintiff is entitled to that portion of her Prayer for Relief seeking to enjoin the printing of the ballot for the November 4, 2008, election. Should such relief be granted, and preclearance subsequently received prior to the November 4, 2008 election, the election will be nonetheless prevented due to the absence of available ballots. Bell agrees with all other aspects of Plaintiff's Prayer for Relief.

*/s/ Michael K. K. Choy*

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Michael K.K. Choy (CHO001)

### **OF COUNSEL**

#### **HASKELL SLAUGHTER YOUNG & REDIKER, LLC**

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