

No. 22-30333

UNITED STATES COURT OF APPEALS  
FOR THE FIFTH CIRCUIT

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PRESS ROBINSON; EDGAR CAGE; DOROTHY NAIRNE; EDWIN RENE SOULE; ALICE WASHINGTON; CLEE EARNEST LOWE; DAVANTE LEWIS; MARTHA DAVIS; AMBROSE SIMS; NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE LOUISIANA STATE CONFERENCE, also known as NAACP; POWER COALITION FOR EQUITY AND JUSTICE,  
*Plaintiffs-Appellees*

v.

KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana,  
*Defendant-Appellant*

CLAY SCHEXNAYDER; PATRICK PAGE CORTEZ; STATE OF LOUISIANA—ATTORNEY GENERAL JEFF LANDRY,  
*Intervenor Defendants-Appellants*

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EDWARD GALMON, SR.; CIARA HART; NORRIS HENDERSON; TRAMELLE HOWARD,  
*Plaintiffs-Appellees*

v.

KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana,  
*Defendant-Appellant*

CLAY SCHEXNAYDER; PATRICK PAGE CORTEZ; STATE OF LOUISIANA—ATTORNEY GENERAL JEFF LANDRY,  
*Movants-Appellants*

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On Appeal from the United States District Court  
for the Middle District of Louisiana  
(Nos. 3:22-cv-00211-SDD-SDJ, 3:22-cv-00214-SDD-SDJ)

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**GALMON PLAINTIFFS-APPELLEES' MOTION FOR LEAVE TO FILE  
BRIEF THAT EXCEEDS WORD LIMITS**

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Pursuant to Federal Rules of Appellate Procedure 27 and 32, Plaintiffs-Appellees Edward Galmon, Sr., Ciara Hart, Norris Henderson, and Tranelle Howard (the “*Galmon* Plaintiffs”), for the reasons set forth below, respectfully move this Court to allow them to file a principal brief that exceeds 13,000 words, for a total of 15,000 words.<sup>1</sup>

This case arises out of the *Galmon* Plaintiffs’ motion for preliminary injunction, in which they sought an order (1) declaring that Louisiana’s enacted congressional districting plan violates Section 2 of the Voting Rights Act of 1965; (2) enjoining Defendant-Appellant Louisiana Secretary of State Kyle Ardoin from conducting future elections—including the 2022 midterm elections—under the enacted congressional plan; and (3) ordering adoption of a valid congressional districting plan that gives Black voters the opportunity to elect their candidates of choice in two congressional districts. On June 6, 2022, the district court granted the *Galmon* Plaintiffs’ motion, and these appeals followed.

There is good cause to grant this motion. On June 20, 2022, the Court granted Appellants’ motion to file a joint opening brief not to exceed 20,000 words;

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<sup>1</sup> Because Appellants’ opening brief was filed on June 21, 2022, and, pursuant to the Court’s expedited briefing schedule, response briefs are due on June 27, 2022, the *Galmon* Plaintiffs respectfully seek relief from the Court’s general rule that “[a] motion to file a brief in excess of the page length or word-volume limitations must be filed at least 10 days in advance of the brief’s due date.” 5th Cir. R. 32.4.

Appellants' joint opening brief ultimately contained 19,997 words. *See* Appellants' Br. 90. Appellants represent that that "[t]his Court rarely will encounter a redistricting case as consequential," *id.* at 1, and raise myriad issues in their joint opening brief that implicate complex constitutional, statutory, and factual questions. The *Galmon* Plaintiffs respectfully request a modest enlargement of 2,000 words to fully and adequately address those issues. They therefore move for leave to file a response brief in excess of the 13,000-word limit prescribed by Rule 32(a)(7)(B)(i), for a total of 15,000 words.

Pursuant to Fifth Circuit Rule 27.4, counsel for the *Galmon* Plaintiffs requested consent from counsel for Appellants. Counsel for Appellants indicated that they oppose the *Galmon* Plaintiffs' motion but, as of the time of this filing, had not indicated whether they intend to file oppositions.

WHEREFORE, Plaintiffs-Appellees Edward Galmon, Sr., Ciara Hart, Norris Henderson, and Tramelle Howard pray that this motion be granted, and that they be granted leave to file a principal brief consisting of 15,000 words.

Dated: June 24, 2022

By: /s/ Darrel J. Papillion  
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Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing complies with the length limitations of Federal Rule of Appellate Procedure 27(d)(2) because it is 420 words, excluding the parts that are exempted under Rule 32(f). It complies with the typeface and type-style requirements of Rule 32(a)(5) and Rule 32(a)(6) because it is printed in 14-point Times New Roman font, a proportionally spaced typeface with serifs.

Dated: June 24, 2022

/s/ Darrel J. Papillion  
Darrel J. Papillion  
Counsel for the *Galmon* Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2022, a true and correct copy of the foregoing was filed via the Court's CM/ECF system and served via electronic filing upon all counsel of record in this case.

Dated: June 24, 2022

/s/ Abha Khanna  
Abha Khanna  
Counsel for the *Galmon* Plaintiffs