

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

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 (“NAACP”) LOUISIANA
STATE CONFERENCE, AND POWER
COALITION FOR EQUITY AND
JUSTICE,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity as
Secretary of State for Louisiana,

Defendan

t.

Civil Action No. 3:22-cv-00211-SDD-RLB

EDWARD GALMON, SR., CIARA
HART, NORRIS HENDERSON,
TRAMELLE HOWARD,

Plaintiffs,

v.

KYLE ARDOIN, in his official capacity as
Secretary of State for Louisiana,

Defendan

t.

Civil Action No. 3:22-cv-00214-SDD-RLB

**PLAINTIFFS’ JOINT LIST OF EXHIBITS AND WITNESSES FOR
REMEDIAL PROCEEDINGS**

Pursuant to the Court’s order on September 7, 2023, *see* ECF No. 275, the *Robinson* and *Galmon* Plaintiffs (together, the “Plaintiffs”) respectfully submit the following list of exhibits and witnesses they expect to use in connection with the remedial hearing to be set by the Court.

1. Exhibits

The Plaintiffs expect to use the following exhibits during their case-in chief and reserve the right to revise or supplement this list, including but not limited to, revisions or supplements in response to Defendants’ preliminary injunction submissions. The Plaintiffs further reserve the right to offer additional exhibits on cross-examination or as part of their rebuttal, and reserve the right to offer exhibits listed or offered by any other party to this action. In addition to exhibits, Plaintiffs reserve the right to present demonstratives.

Plaintiffs also proceed with the understanding that the evidence and testimony introduced to the Court through the preliminary injunction hearing in *Robinson v. Ardoin*, 605 F. Supp. 3d 759 (M.D. La. 2022) held in May 2022 are a part of the record in this remedial hearing in their entirety, and reserve the right to use all such materials during this hearing.

Exhibit No.	Description
PR-86	Deposition Testimony of Dr. Douglas Johnson, dated June 28, 2022
PR-87	Remedial Report of Anthony Fairfax, dated June 22, 2022 (ECF No. 225-1)
PR-88	Remedial Report of Dr. Lisa Handley, dated June 22, 2022 (ECF No. 225-2)

PR-89	Supplemental Report of Dr. Lisa Handley, dated September 15, 2023
PR-90	Remedial Report of Maxwell Palmer, dated September 15, 2023
PR-91	Deposition Testimony of Dr. David A. Swanson, dated September 22, 2023
PR-92	Deposition Testimony of Sean P. Trende, dated September 26, 2023
PR-93	Rebuttal Report of Anthony Fairfax, dated September 28, 2023
PR-94	Rebuttal Report of Michael S. Martin, dated September 28, 2023
PR-95	Rebuttal Report of Dr. Jonathan Rodden, dated September 28, 2023

2. Witnesses

Plaintiffs list below the witnesses they presently intend to or may call at the remedial hearing, unless otherwise specified, and reserve the right to call witnesses listed by any other party to this action. The Plaintiffs also reserve the right to call additional witnesses based on the Defendants' submissions in connection with the remedial hearing, or otherwise in rebuttal.

Witness	Likelihood
Dr. Lisa Handley	Intends to call
Mr. Anthony Fairfax	Intends to call
Dr. Maxwell Palmer	Intends to call
Dr. Jonathan Rodden	Intends to call
Dr. Michael S. Martin	May call
Edwin René Soulé	May call
Dr. Alice Washington	May call

Clee Earnest Lowe	May call
Edgar Cage	May call
Dr. Press Robinson	May call
Martha Davis	May call
Ambrose Sims	May call
Ashley Shelton	May call
Davante Lewis	May call
Christopher Tyson	May call

Date: September 29, 2023

Respectfully submitted,

By: /s/Amitav Chakraborty

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