



September 13, 2022

VIA ECF

Michael B. de Leeuw

Direct Phone 212-908-1331

Direct Fax 646-461-2090

mdeleeuw@cozen.com

Mr. Lyle W. Cayce, Clerk
F. Edward Herbert Building
600 S. Maestri Place, Suite 115
New Orleans, LA 70130-3408

Re: Unopposed Level 1, 30-day Extension of Time to File Brief as Appellees in *Chisom, et al. v. State of Louisiana*, No. 22-30320

Dear Mr. Cayce:

We write jointly on behalf of Plaintiffs-Appellees Ronald Chisom, Marie Bookman, and the Urban League of Louisiana and Intervenor Plaintiff-Appellee Justice Bernette J. Johnson (collectively, "Requesting Appellees"), to respectfully request a Level 1, 30-day extension of time to file their respective briefs as appellees in the above-referenced case. Counsel has conferred with appellant's counsel, and this request is unopposed.

The State of Louisiana filed its opening brief as defendant-appellant on August 24, 2022, after having sought and received an unopposed 30-day extension. Accordingly, briefs for all appellees would be due September 23, 2022. Last week, however, Intervenor Plaintiff-Appellee the United States sought and received an unopposed 30-day extension, moving the deadline for its brief to October 24, 2022. If Requesting Appellees' request is granted, their briefs would likewise be due October 24, 2022.

Requesting Appellees extension of time is necessary in light of the complexity and importance of the issues on appeal, and to keep the deadlines applicable to the different appellee briefs from being out of sync. In particular, any ability for the Requesting Appellees to join in or adopt by reference any part of the United States' brief under Federal Rule of Appellate Procedure 28(i) depends on their briefing schedule remaining in step with their co-appellee.

Mr. Lyle W. Cayce, Clerk
September 13, 2022
Page 2

Respectfully submitted,

COZEN O'CONNOR

ACLU OF LOUISIANA

/s/ Michael B. de Leeuw

/s/ Nora Ahmed

By: Michael B. de Leeuw
*Counsel for Plaintiffs-Appellees
Ronald Chisom, et al.*

Nora Ahmed
*Counsel for Intervenor
Plaintiff-Appellee
Justice Bernette J. Johnson*