

Exhibit AA

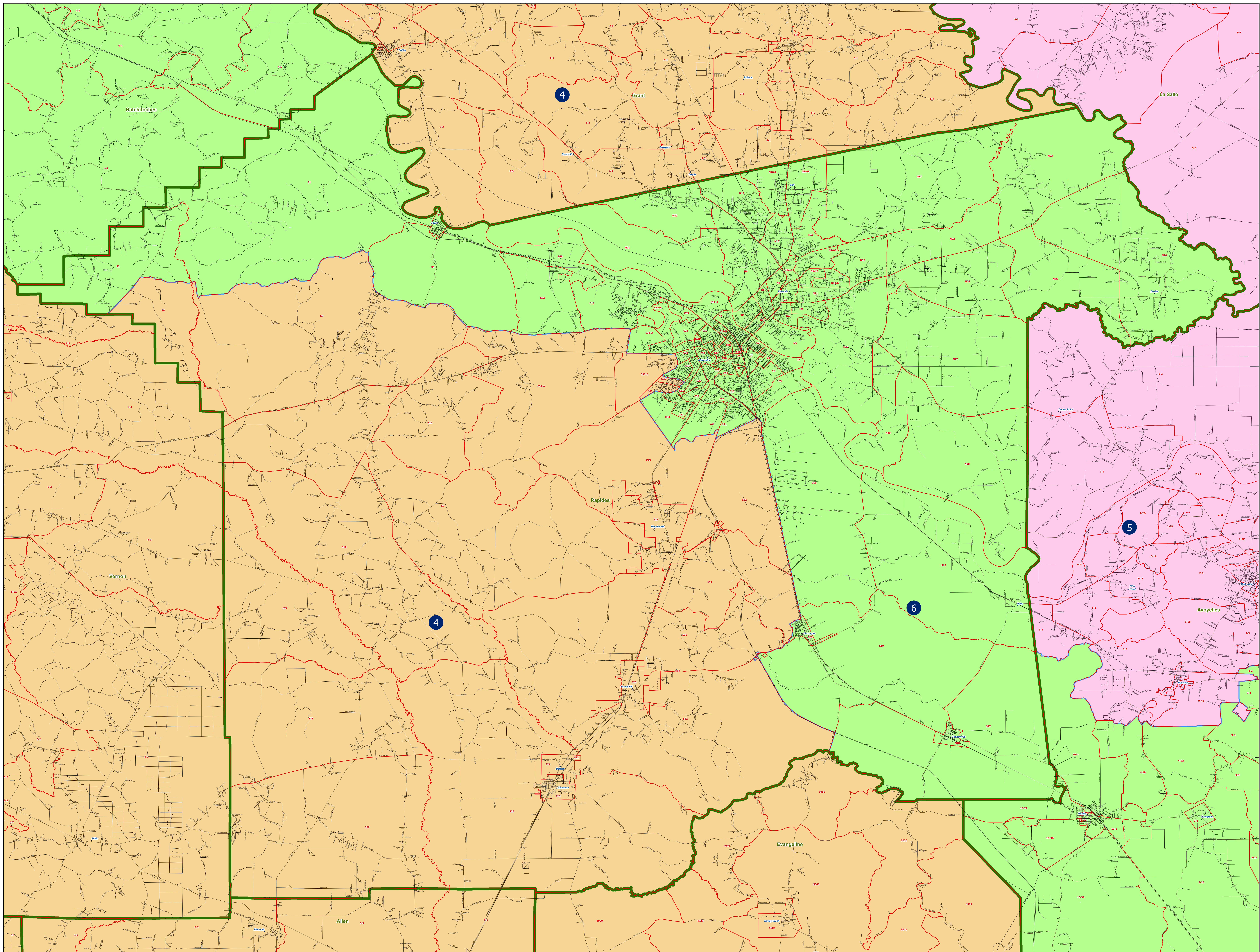


Exhibit BB

Act 2 - 1st ES (2024) - Congressional Districts - St. Bernard

Precincts as of 01-10-2024

Case 3:24-cv-00122-DJ-CES-RRS Document 17-30 Filed 02/07/24 Page 2 of 2 PageID #: 379

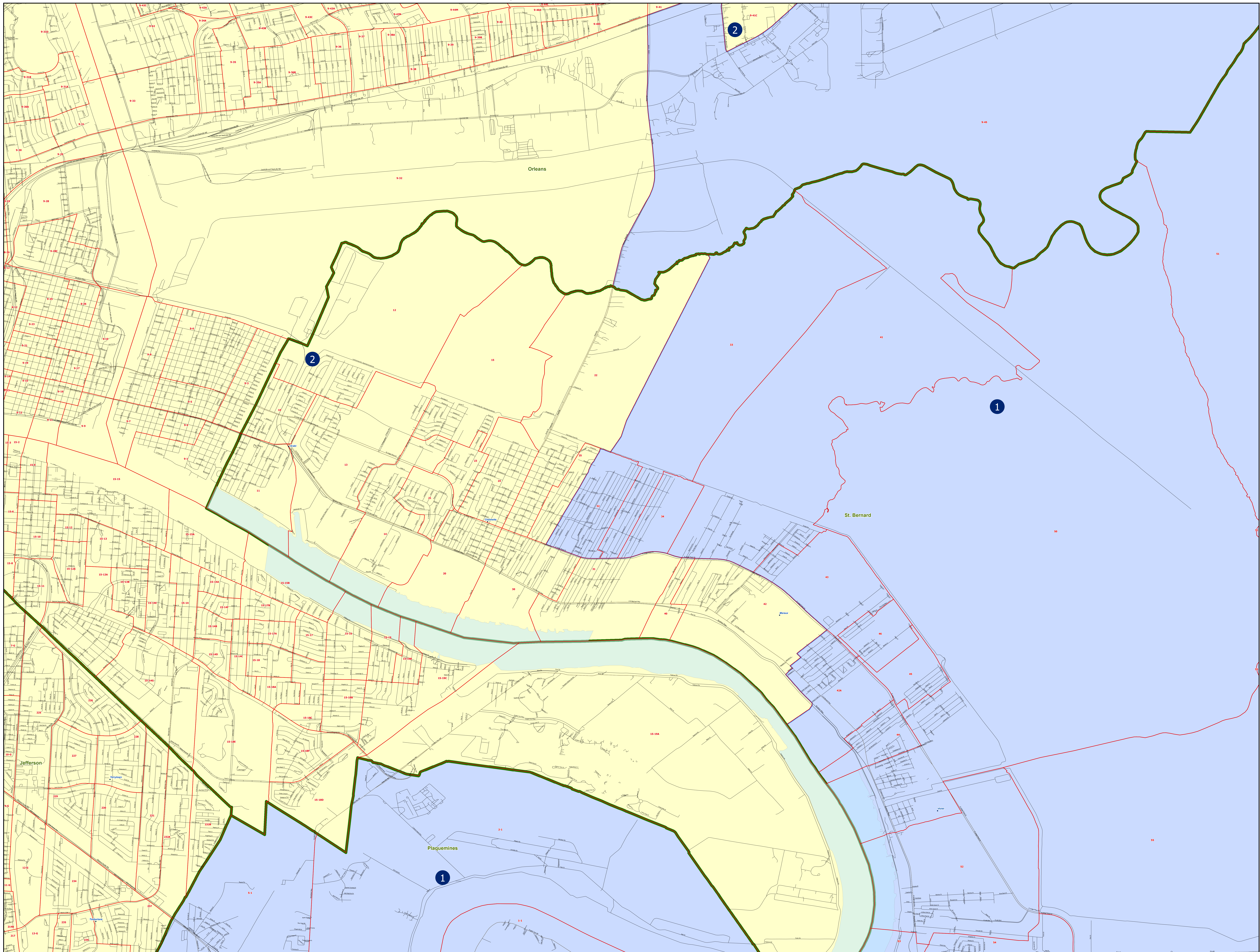


Exhibit CC

Act 2 - 1st ES (2024) - Congressional Districts - St. Charles

Precincts as of 01-10-2024

Case 3:24-cv-00122-DGJ-CES-RRS Document 17-31 Filed 02/07/24 Page 2 of 2 PageID #: 381

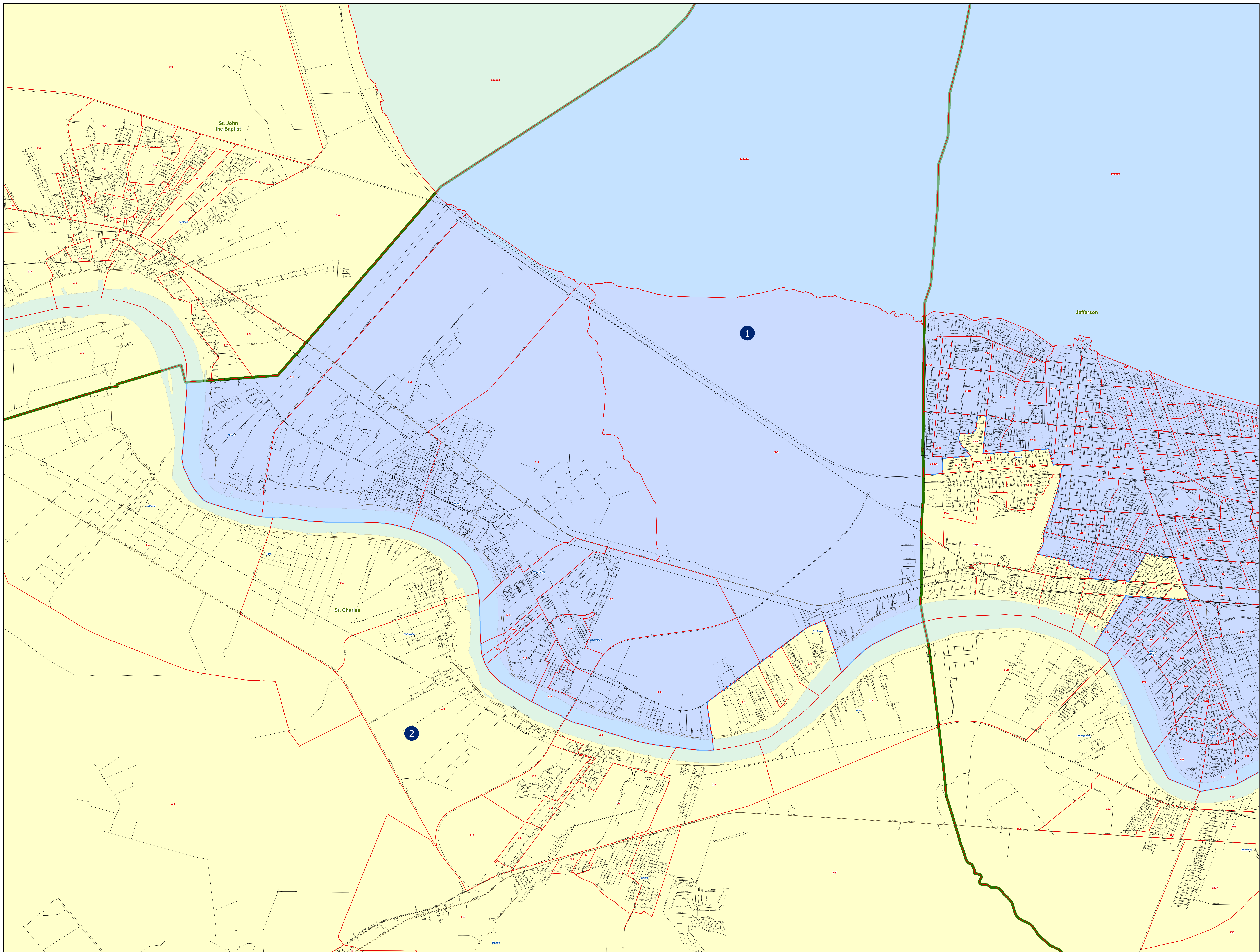


Exhibit DD

ADVERTISEMENT

13,944

Add to Cart

Gov. Landry calls special session on redistricting as new legislature takes office



By [Sabrina Wilson](#)

Published: Jan. 8, 2024 at 7:51 PM CST



BATON ROUGE, La. (WVUE) - Republican Jeff Landry officially assumed the governor's office Monday (Jan. 8) at noon, and hours later issued his first call for a special legislative session. A new Louisiana legislature also was sworn in at the state capitol building and two New Orleans-area lawmakers gained more power.

The special session scheduled to start Jan. 15 will focus on redistricting. A federal court has ordered the state to redraw its Congressional boundaries, saying the current map dilutes black voting strength in the state.



On the other side of the capitol, Rep. Phillip Devillier (R-Eunice) was named House Speaker. And Rep. Matthew Willard (D-New Orleans) got a new leadership role.

"I'm the chair of the House Democratic Caucus, meaning I lead the caucus of 32 members to represent Democratic values in the state of Louisiana," Willard said.

Republicans hold a super-majority in both chambers of the legislature. But Democrats say they will continue to push for legislation aligned with their ideals.

"We're here to meet the challenge and we're going to make sure that our voices are heard and that our constituents are represented," Sen. Royce Duplessis (D-New Orleans) said.

In the Senate, Henry said some Democrats will chair committees.

"Yes, we're definitely going to have Democratic chairs, no doubt it," Henry said.

In a week, lawmakers return to the capitol to start a special session on reapportionment. Democrats have argued for two years that the state's population warrants a second majority-Black district.

"The math is clear," Willard said. "A third of six is two. And so we look forward to beginning that redistricting session and walking away with two majority-minority African-American congressional districts. When we talk about the Supreme Court map, the same is true."

Henry said he believes the legislature will get the job done.

"We've been working diligently on the congressional map," he said. "So, I'm confident that we'll get a map that suffices the judge's requirements as it relates to the Supreme Court. We have a lot of work to do there, because that's kind of coming in at the end."

Duplessis said it is time the legislature adheres to what the federal court demands.

"I don't think we really have a choice," Duplessis said. "We have to do what the judge has ordered us to do. We've been at this over two years now, so it's my hope that we use this opportunity and come in and do what the law has ordered us to do."

A special session on crime is expected to be called soon after the redistricting conclave.

Sen. Pat Connick (R-Marrero) says the state has to get tougher on criminals.

"We just got to prosecute the criminals," Connick said. "If you commit a crime, go after them, put you in jail. ... I think, in the past, it was some break away from that."

But some Democrats say the roots of crime cannot be ignored in new legislation.

"I hope that what comes from it is data-driven solutions that make our communities safer," Willard said. "And we're working on legislation. So, the House Democratic Caucus will have legislation proposed during that crime special session."

Duplessis said, "We cannot have a real conversation about crime if we're not talking about root causes such as economic opportunity, mental health, other issues that impact crime."

Rep. Stephanie Hilferty (R-Metairie/New Orleans) said education is one of her top priorities for the new legislature.

"One is early education, which I have fought for for a long time," she said. "I'm hopeful we can make some progress on the crime situation, specifically"



Exhibit EE



Rep Willard to lead Louisiana House Democratic Caucus in 2024

Baton Rouge / louisianaradionetwork.com

Brooke Thorington

Dec 1, 2023 | 3:58 AM



New Orleans Rep Matthew Willard

New Orleans Representative Matthew Willard has been elected chairman of the House Democratic Caucus for the 2024 legislative term. And even with a Republican governor and supermajority in the legislature, he said Democrats will continue to champion people-centric issues like insurance reform, equal pay for women, and rape and incest exceptions to the state’s abortion ban...

“And hopefully we can bring some excitement and encouragement back to the Democratic voters here in the State of Louisiana,” said Willard.

Among the first issues lawmakers will address in 2024 is the special redistricting session following a court order to create two majority-minority congressional districts. Even with a tight deadline, Willard believes lawmakers will complete the task.

“We’ll be doing everything we can to make sure that we are not diluting the voices of Black voters in Louisiana and to get those two majority-minority seats,” said Willard.

The earliest the legislature could meet after a special session can officially be called for on January 8th is the 15th and the deadline has been extended to January 30th.

Willard said the courts agree the current congressional map passed by the majority Republican legislature twice violates the Voting Rights Act. He believes GOP members who thought the courts would approve their map with only one majority-Black congressional district no longer have that failsafe.

“Because at the end of the day, you can keep trying to challenge it in court but if the legislature does not comply with Judge Dick’s ruling, Judge Dick will put a map in that she believes complies with Section 2 of the Voting Rights Act,” said Willard.

In addition to Willard as Chair of the House Democratic Caucus, New Iberia Representative Marcus Bryant was elected Vice Chair, New Orleans Representative Aimee Adatto Freeman was elected Treasurer and Monroe Representative Adrian Fisher was elected Whip.

Comments

Leave a Reply

You must be [logged in](#) to post a comment.

Search this website ...



Exhibit FF



[Home](#) / [Media](#) / [Press Releases](#)

Congressman Troy Carter Demands Fair Congressional Maps

January 15, 2024 [Press Release](#)

WASHINGTON, D.C. – Today, Congressman Troy A. Carter, Sr. (D-La.) held a press conference with the Louisiana Legislative Black Caucus (LLBC), civil rights leaders, the NAACP, and Urban League of Louisiana, expressing their united commitment to work with the Louisiana Legislature and Governor Landry to develop a constitutional map that contains two majority-minority congressional districts. Congressman Carter's remarks as prepared for delivery are below:

“Hello and thank you. I am so glad we are here together. I know there is a lot going on right now and some members may be in meetings or in transit given that the session is about to start. It's always a pleasure to come home to the building where I began my elected service. We are gathered here on Dr. Martin Luther King, Jr. Day – because of the past. We are also here, however, because of the present and the future.

“We are here because the Supreme Court has stated: Louisiana has unconstitutional congressional maps. We have been given an opportunity to correct this and look to the future.

“It is Martin Luther King, Jr. Day, and, though I know it was chosen because it was the earliest possible time to call for this session, it would be irresponsible of me not to acknowledge Dr. King's legacy. So, to begin, I will simply say as he did ‘the time is always ripe to do right.’

“Today, Louisiana has an opportunity for a fresh start. The opportunity to craft fair Congressional districts that allow all of its people to meaningfully participate in the elections of those who represent them. For nearly two years, I have consistently called for the creation of a second majority-minority district. Math is math and 1/3 of the population deserves the opportunity to fairly elect a candidate of their choice. The courts have spoken, and they have given us the opportunity to draw constitutional districts ourselves. The time is clearly ripe to do what is right.

“I served in this body, and my experience is that everyone here loves Louisiana and wants to do the right thing. This is an opportunity for the legislature to prove that when right is staring us in the face, that they will do the right thing. In my heart I know my friends throughout this building will.

“I know there will be external pressures to continue to delay this past the next election. I know those pressures can seem all consuming, and that kicking this back to the courts might seem politically expedient. Elected officials have multiple obligations. Politics does matter. Ideology does matter. But nothing matters more than doing what’s right. This is our responsibility, not the judiciary. Don’t leave it to them. Math is math.

“I stand here with my friends from the Legislative Black Caucus, the NAACP, Urban League of Louisiana, and civil rights leaders to firmly state that we are unified and ready to work with anyone who is working to create a map that establishes two majority-minority districts that give Black candidates a meaningful opportunity to win. While we know there will be multiple maps presented, working together we can craft the best map to accomplish our shared and sacred goal.

“We all know that Dr. King said ‘a right delayed is a right denied.’ The Supreme Court has ruled that Louisianians have already had their right to fair maps delayed in one election. I am hopeful that the entire legislature came here today to protect everyone’s voting rights. I know, working together, we can do the right thing. God bless you and thank you.”

###

[Copyright](#) [Privacy](#) [House.gov](#) [Accessibility](#)

Exhibit GG

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF ELIZABETH ERSOFF IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Elizabeth Ersoff and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Shreveport, Louisiana and Caddo Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 2.
4. SB8 now places my address in District 6.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.
7. I have been injured by being placed in District 6 under SB8 predominantly based on race.

8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: *February 1, 2024*

/s/ Elizabeth Ersoff
Elizabeth Ersoff

Exhibit HH

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF MIKE JOHNSON IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Mike Johnson and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Shreveport, Louisiana and Caddo Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 4.
4. SB8 now places my address in District 4.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.
7. I have been injured by being placed in District 4 under SB8 predominantly based on race.

8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 5, 2024

/s/ 

Mike Johnson

Exhibit II

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF JOYCE LACOUR IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Joyce LaCour and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Gonzales, Louisiana and Ascension Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 6.
4. SB8 now places my address in District 2.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 2 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 5, 2024

/s/ Joyce C. LaCour
Joyce LaCour

Exhibit JJ

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF ROLFE MCCOLLISTER IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Rolfe McCollister and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Baton Rouge, Louisiana and East Baton Rouge Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 6.
4. SB8 now places my address in District 5.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 5 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 2/2/24


/s/ Rolfe McCollister

Rolfe McCollister

Exhibit KK

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF CANDY CARROLL PEAVY IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Candy Carroll Peavy and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Shreveport, Louisiana and Caddo Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 4.
4. SB8 now places my address in District 4.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.
7. I have been injured by being placed in District 4 under SB8 predominantly based on race.

8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 2, 2024

/s/ Candy Carroll Peavy
Candy Carroll Peavy

Exhibit LL

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF LLOYD PRICE IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Lloyd Price and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in DeVille, Louisiana and Rapides Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 5.
4. SB8 now places my address in District 6.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.
7. I have been injured by being placed in District 6 under SB8 predominantly based on race.

8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 02-02-24

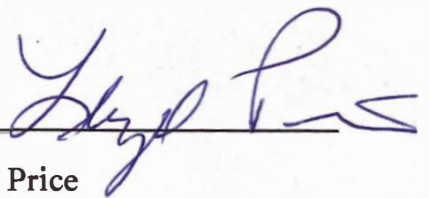
/s/ 
Lloyd Price

Exhibit MM

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

DECLARATION OF HONORABLE GROVER JOSEPH REES, III, IN SUPPORT OF PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION

My name is Grover Joseph Rees, and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Lafayette, Louisiana and Lafayette Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 3.
4. SB8 now places my address in District 6.
5. My home, Lafayette, is the core city of “Acadiana,” the historical name given to the French Louisiana region containing much of the State’s French and Spanish populations. Where I reside in Acadiana is largely Catholic and organized around sugar cane farming, fishing,

and, more recently, the oil industry. We have our own unique culture in this region of Southern Louisiana.

6. Shreveport and Baton Rouge, on the other hand, are urban centers whose people have more in common culturally, socially, and economically with Texas and Mississippi, respectively, than with South Louisiana.
7. SB8 arbitrarily severs my neighborhood in Lafayette from the district that has long contained our whole city and parish, and that still includes most members of our community, and by means of a “corridor” places us into a single district with Baton Rouge and Shreveport and other distant areas of the state, with their own distinct cultures and interests, solely on the basis of race.
8. I am registered to vote in the State of Louisiana based upon my current residence and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
9. I plan to vote in the 2024 congressional election.
10. I have been injured by being placed in District 6 under SB8 predominantly based on race.
11. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
12. I have also suffered from the State’s discrimination against me based on race in SB8.

13. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
14. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria including compactness, contiguity, and communities of interest.
15. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
16. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:
 - c. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
 - d. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
 - e. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
 - f. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 2, 2024

/s/ 

Grover Joseph Rees, III

Exhibit NN

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF DANIEL WEIR, JR., IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Daniel Weir, Jr., and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

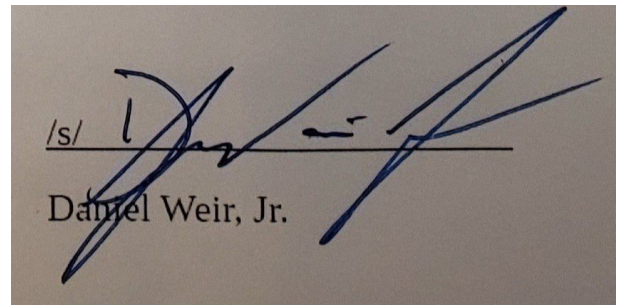
1. I am a non-African American voter who resides in Meraux, Louisiana and St. Bernard Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 1.
4. SB8 now places my address in District 1.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 1 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 5, 2024



/s/ Daniel Weir, Jr.
Daniel Weir, Jr.

Exhibit OO

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF TANYA WHITNEY IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Tanya Whitney, and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Sorrento, Louisiana and Ascension Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 6.
4. SB8 now places my address in District 1.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 1 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 3 Feb 2024

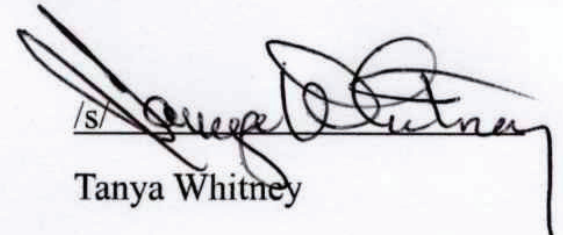

/s/ Tanya Whitney
Tanya Whitney

Exhibit PP

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF BRUCE ODELL IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Bruce Odell and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Lafayette, Louisiana and Lafayette Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 3.
4. SB8 now places my address in District 3.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 3 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 6, 2024

/s/ Bruce Odell

Bruce Odell

Exhibit QQ

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF ALBERT CAISSIE, JR., IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Albert Caissie, Jr., and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

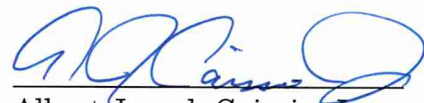
1. I am a non-African American voter who resides in Monroe, Louisiana and Ouachita Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 5.
4. SB8 now places my address in District 5.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.
7. I have been injured by being placed in District 5 under SB8 predominantly based on race.

8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 5, 2024



Albert Joseph Caissie, Jr.

Exhibit RR

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
BRUCE ODELL, ELIZABETH ERSOFF,)
ALBERT CAISSIE, DANIEL WEIR,)
JOYCE LACOUR, CANDY CARROLL)
PEAVY, TANYA WHITNEY, MIKE)
JOHNSON, GROVER JOSEPH REES,)
ROLFE MCCOLLISTER,)

Plaintiffs,)

v.)

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
CAPACITY AS LOUISIANA)
SECRETARY OF STATE,)

Defendant.)

**DECLARATION OF PHILLIP CALLAIS IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

My name is Phillip Callais and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Brusly, Louisiana and West Baton Rouge Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 2.
4. SB8 now places my address in District 6.
5. I am registered to vote in the State of Louisiana based upon my current residency and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
6. I plan to vote in the 2024 congressional election.

7. I have been injured by being placed in District 6 under SB8 predominantly based on race.
8. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
9. I have also suffered from the State's discrimination against me based on race in SB8.
10. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.
11. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria.
12. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:
 - a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
 - b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.
13. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- a. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- b. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- c. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- d. I and the other voters of Louisiana have the time to cast informed votes.

I declare under penalty of perjury that the foregoing is true and correct.

Date:

2-7-24

/s/ Phillip A. Callais

Phillip Callais