

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

PHILLIP CALLAIS, *et al.*,

Plaintiffs,

v.

**NANCY LANDRY, in her official capacity
as Louisiana Secretary of State,**

Defendant.

Case No. 3:24-cv-00122-DCJ-CES-RRS

***GALMON* MOVANTS' MOTION TO EXPEDITE BRIEFING ON THEIR MOTION TO
RECONSIDER ORDER DENYING INTERVENTION**

Pursuant to 28 U.S.C. § 1657(a), Edward Galmon, Sr., Ciara Hart, Norris Henderson, Tramelle Howard, and Dr. Ross Williams ("*Galmon* movants") respectfully request that the Court set an expedited briefing schedule on their Motion to Reconsider Order Denying Intervention.

Galmon movants propose the following expedited briefing schedule:

March 11, 2024 Deadline for any Responses to the Motion to Reconsider
Order Denying Intervention

March 12, 2024 Deadline for Reply to the Motion to Reconsider Order
Denying Intervention

Plaintiffs, Defendant Secretary of State, and Intervenor-Defendant State of Louisiana have each indicated that they take no position on *Galmon* movants' proposed expedited briefing schedule.

In the alternative, in the interest of avoiding delay and proceeding expeditiously to the preliminary injunction hearing, *Galmon* Movants respectfully request leave to participate in discovery while the motion for reconsideration is pending.

Respectfully submitted this March 7, 2024.

s/ J.E. Cullens, Jr.

J. E. Cullens, Jr. (LA # 23011)
Andrée Matherne Cullens (LA # 23212)
Stephen Layne Lee (LA # 17689)
WALTERS, THOMAS, CULLENS, LLC
12345 Perkins Road, Bldg. One
Baton Rouge, LA 70810
(225) 236-3636
cullens@lawbr.net
acullens@lawbr.net
laynelee@lawbr.net

s/ Abha Khanna

Abha Khanna* (# 917978)
ELIAS LAW GROUP LLP
1700 Seventh Ave., Suite 2100
Seattle, WA 98101
(206) 656-0177
akhanna@elias.law

Lalitha D. Madduri* (# 917979)
Jacob D. Shelly* (# 917980)
Daniel Cohen* (# 917976)
Qizhou Ge* (# 917977)
ELIAS LAW GROUP LLP
250 Massachusetts Ave. NW, Suite 400
Washington, DC 20001
(202) 968-4490
lmadduri@elias.law
jshelly@elias.law
dcohen@elias.law
age@elias.law

* Admitted *pro hac vice*

Counsel for *Galmon* Movants

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2024, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and that service will be provided through the CM/ECF system.

s/ Abha Khanna
Abha Khanna

Counsel for *Galmon* Movants

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

PHILLIP CALLAIS, *et al.*,

Plaintiffs,

v.

**NANCY LANDRY, in her official capacity
as Louisiana Secretary of State,**

Defendant.

Case No. 3:24-cv-00122-DCJ-CES-RRS

***GALMON* MOVANTS' MEMORANDUM IN SUPPORT OF MOTION TO EXPEDITE
BRIEFING ON THEIR MOTION TO RECONSIDER ORDER DENYING
INTERVENTION**

Pursuant to 28 U.S.C. § 1657(a), Edward Galmon, Sr., Ciara Hart, Norris Henderson, Tranelle Howard, and Dr. Ross Williams (“*Galmon* movants”) respectfully request that the Court set an expedited briefing schedule on their Motion to Reconsider Order Denying Intervention. Plaintiffs, Defendant Secretary of State, and Intervenor-Defendant State of Louisiana have each indicated that they take no position on *Galmon* movants’ proposed expedited briefing schedule.

Galmon movants have made every effort to ensure that their requested participation in this action does not unduly delay the proceedings. After Plaintiffs filed their complaint on January 31, *Galmon* movants moved to intervene within a week. *See* ECF Nos. 1, 10. After the Court issued its order on February 21 directing Defendant to file any response to Plaintiff’s motion for preliminary injunction by February 27, *Galmon* movants quickly prepared their own opposition to Plaintiff’s motion and filed it as an amicus brief by Defendant’s deadline. *See* ECF Nos. 63, 85. And after this Court issued its order on February 26 denying intervention but inviting proposed intervenors to seek reconsideration “if they can establish adversity or collusion by the State,” ECF No. 79, *Galmon* movants promptly sought that reconsideration four days later, *see* ECF No. 96.

Consistent with their efforts to adhere to the quick pace by which this litigation is proceeding, *Galmon* movants now request that the Court consider their motion for reconsideration on an expedited schedule. Under the default schedule, any opposition to the motion for reconsideration would not be due until March 22. *See* L.R. 7.5. By then, expert reports will have been exchanged, significant discovery will likely have been completed, and the April 8 trial date will be fast approaching. *See* ECF No. 63. As this Court has already recognized, *Galmon* movants have significant interests at stake that may be impaired by this litigation, *see* ECF No. 79 at 4, 7, and those interests remain unprotected every day that they are excluded from this litigation, *see* ECF No. 96. Especially where Defendant Secretary of State has represented that the districting

map for Louisiana’s 2024 congressional elections must be in place by May 15, 2024, *see* ECF No. 82, there is good cause to expedite consideration of this matter, *see* 28 U.S.C. § 1657(a) (providing “the court shall expedite the consideration of any action . . . if good cause therefor is shown”). Expediting the motion for reconsideration will help ensure that the issue of *Galmon* movants’ participation does not impede a swift resolution of this case. For example, if the motion is expeditiously granted, it will avoid later questions about whether any additional discovery need be taken because of evidentiary issues that may be germane to their arguments.¹

Accordingly, *Galmon* movants propose the following expedited briefing schedule:

March 11, 2024 Deadline for any Responses to the Motion to Reconsider
Order Denying Intervention

March 12, 2024 Deadline for Reply to the Motion to Reconsider Order
Denying Intervention

In the alternative, in the interest of avoiding delay and proceeding expeditiously to the preliminary injunction hearing, *Galmon* movants respectfully request leave to participate in discovery while the motion for reconsideration is pending.

Respectfully submitted this March 7, 2024.

s/ J.E. Cullens, Jr.

J. E. Cullens, Jr. (LA # 23011)
Andrée Matherne Cullens (LA # 23212)
Stephen Layne Lee (LA # 17689)
WALTERS, THOMAS, CULLENS, LLC
12345 Perkins Road, Bldg. One

s/ Abha Khanna

Abha Khanna* (# 917978)
ELIAS LAW GROUP LLP
1700 Seventh Ave., Suite 2100
Seattle, WA 98101
(206) 656-0177

¹ Notably, if the motion is denied but *Galmon* movants succeed in their interlocutory appeal as of right, *see Stringfellow v. Concerned Neighbors in Action*, 480 U.S. 370, 377 (1987), the disruption to the current schedule would be even more significant, *see Edwards v. City of Houston*, 78 F.3d 983, 1006 (5th Cir. 1996) (reversing denial of intervention and remanding with orders to reopen discovery and conduct new hearing).

Baton Rouge, LA 70810
(225) 236-3636
cullens@lawbr.net
acullens@lawbr.net
laynelee@lawbr.net

akhanna@elias.law

Lalitha D. Madduri* (# 917979)
Jacob D. Shelly* (# 917980)
Daniel Cohen* (# 917976)
Qizhou Ge* (# 917977)
ELIAS LAW GROUP LLP
250 Massachusetts Ave. NW, Suite 400
Washington, DC 20001
(202) 968-4490
lmadduri@elias.law
jshelly@elias.law
dcohen@elias.law
age@elias.law

* Admitted *pro hac vice*

Counsel for *Galmon* Movants

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2024, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and that service will be provided through the CM/ECF system.

s/ Abha Khanna
Abha Khanna

Counsel for *Galmon* Movants

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

PHILLIP CALLAIS, *et al.*,

Plaintiffs,

v.

**NANCY LANDRY, in her official capacity
as Louisiana Secretary of State,**

Defendant.

Case No. 3:24-cv-00122-DCJ-CES-RRS

**[PROPOSED] ORDER GRANTING *GALMON* MOVANTS' MOTION TO EXPEDITE
BRIEFING ON THEIR MOTION TO RECONSIDER ORDER DENYING
INTERVENTION**

The Court having considered the motion to expedite briefing on the motion to reconsider the order denying intervention to *Galmon* Movants Edward Galmon, Sr., Ciara Hart, Norris Henderson, Tramelle Howard, and Ross Williams, and all the grounds presented, it is hereby ORDERED that the *Galmon* Movants' motion is GRANTED.

Parties shall comply with the following briefing schedule:

March 11, 2024 Deadline for any Responses to the Motion to Reconsider
Order Denying Intervention

March 12, 2024 Deadline for Reply to the Motion to Reconsider Order
Denying Intervention

IT IS SO ORDERED.

This ____ day of _____ 2024.

Judge Carl E. Stewart
United States Circuit Judge

Judge Robert R. Summerhays
United States District Judge

Judge David C. Joseph
United States District Judge