

**NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA**

JAMES BULLMAN, KIRK GREEN, STEPHEN
HANDWERK, DARRYL MALEK-WILEY,
AMBER ROBINSON, and POOJA PRAZID,

Plaintiffs,

v.

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

Defendant.

Civil Action No. C-716690

Div.: C

Sec.: 24

**MOTION FOR EXPEDITED SCHEDULING CONFERENCE AND ORDER DUE TO
EXIGENT CIRCUMSTANCES**

Plaintiffs James Bullman, Kirk Green, Stephen Handwerk, Darryl Malek-Wiley, Amber Robinson, and Pooja Prazid, by and through their undersigned counsel, file this motion for an immediate scheduling conference and scheduling order from this Court adopting a calendar to undertake judicial redistricting of Louisiana’s congressional districts.

As Plaintiffs described in their petition, the Legislature and Governor—the entities responsible for Louisiana’s decennial redistricting—are at an impasse and unlikely to enact a new congressional districting plan in time for the November 2022 midterm elections. When, as here, the political branches are deadlocked and unable to complete the constitutionally required act of redistricting, “[t]his task [] fall[s] to the court.” *Below v. Gardner*, 148 N.H. 1, 3, 963 A.2d 785, 786 (2002) (per curiam).

The candidate qualifying period is set to commence only four months from now.¹ Accordingly, “[t]o avoid delaying the electoral process, the [Court] must now act.” *Watson v. Simon*, Nos. A21-0243, A21-0546, 2022 WL 456443, at *1 (Minn. Special Redistricting Panel Feb. 15, 2022) (adopting new congressional districting plan last month after political branches deadlocked).

To that end, Plaintiffs respectfully request that this Court order a scheduling conference by March 23, 2022, in order to begin the necessary process of judicial redistricting.

¹ The dates of the candidate qualifying period and other election deadlines can be found on Defendant’s website. See *2022 Elections*, La. Sec’y of State, <https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf> (last visited Mar. 16, 2022).

Moreover, Plaintiffs respectfully submit the following proposed calendar for the Court's consideration and adoption:

Deadline for intervention motions	March 25, 2022
Deadline for proposed redistricting plans and supporting memoranda/expert reports	April 1, 2022
Deadline for responses to proposed redistricting plans and supporting memoranda/expert reports	April 15, 2022
Deadline for replies in support of proposed redistricting plans and supporting memoranda/expert reports	April 22, 2022
Hearing on plan submissions	Week of May 2, 2022
Deadline for Court's adoption of new congressional plan	May 25, 2022

Wherefore, considering the above and foregoing, Plaintiffs request that this Honorable Court set an immediate status conference and issue a scheduling order as prayed for.

Dated: March 17, 2022


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**Pro Hac Vice* application forthcoming

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has been electronically mailed this date to all known counsel of record on this 17th day of March, 2022, as follows:

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ORDER

Considering the above and foregoing ;

It is hereby ORDERED that a status conference will be conducted on the _____ day of _____, 2022 at ____ o'clock __.m. in order to set a scheduling order adopting a calendar to undertake judicial redistricting of Louisiana's congressional districts.

Baton Rouge, Louisiana, this ____ day of _____, 2022.

HONORABLE DONALD R. JOHNSON
Judge, 19th JDC, Section 24

Service will be made pursuant to La. CCP art. 1313(C) on the following:

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