

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, et al.,

Plaintiffs,

v.

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

Defendant.

*consolidated with*

EDWARD GALMON, SR., et al.,

Plaintiffs,

v.

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

Defendant.

CIVIL ACTION

NO. 3:22-CV-00211-SDD-SDJ

*consolidated with*

NO. 3:22-CV-00214-SDD-SDJ

**NOTICE OF DEFENDANTS' PROPOSED SCHEDULE**

NOW INTO COURT, through the undersigned counsel, comes Defendant R. Kyle Ardoin, in his official capacity as Secretary of State for the State of Louisiana, the State of Louisiana, and Legislative Intervenors Clay Schexnayder and Patrick Page Cortez (collectively "Defendants") pursuant to Fed. R. Civ. P. 16(b) and this Court's September 1, 2023, order [D.E. 272] and notify the Court as follows:

1. Following the Status Conference on September 1, 2023, and the entry of D.E. 272, counsel for Defendants emailed counsel for Plaintiffs on Friday September 1, 2023, seeking their position on whether Plaintiffs wanted a new map and a new hearing date. Counsel for Plaintiffs indicated

that a response was forthcoming on Monday. Hearing nothing, Counsel for Defendants' followed up again on Tuesday, September 5, 2023. Finally, at 11:31 PM counsel for Plaintiffs notified the counsel for Defendants' that the plaintiffs would stick to the October 3-5 hearing date and schedule discussed on Friday's call. This was confirmed again on the morning of September 6, 2023. A true and accurate copy of this email correspondence is attached as Exhibit 1.

2. Throughout the day on September 6, 2023, counsel for Defendants drafted a consent motion with the scheduling order they believed was agreed to via email. Unfortunately, no agreement on that motion could be reached.

3. As such, Defendants' hereby provide notice to the Court pursuant to D.E. 272 of their proposed schedule. This schedule listed below contemplates the October 3-5, 2023 hearing date elected by Plaintiffs and Defendants' understanding that Plaintiffs will not submit a new map.

1.	All Parties Serve Fact Witness Disclosures	<b>September 14, 2023</b>
2.	Defendants Serve Expert Reports (Supplemental and New)	<b>September 15, 2023</b>
3.	Plaintiffs Disclose Rebuttal Expert Witnesses	<b>September 18, 2023</b>
4.	Plaintiffs Serve Rebuttal Expert Reports	<b>September 28, 2023</b>
5.	All Parties File Witness and Exhibit Lists	<b>September 29, 2023</b>
6.	All Parties File Pre-Hearing Briefs (limit 30 pages per side)	<b>September 29, 2023</b>

Respectfully submitted, this the 6<sup>th</sup> day of September, 2023.

/s/ Patrick T. Lewis

Patrick T. Lewis\*

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127 Public Square, Ste. 2000

/s/ Phillip J. Strach

Phillip J. Strach, *pro hac vice*

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**Jeff Landry**

**Louisiana Attorney General**

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\*admitted pro hac vice

# **Exhibit 1**

## Alyssa Riggins

---

**From:** Alyssa Riggins  
**Sent:** Wednesday, September 6, 2023 6:04 PM  
**To:** Stuart Naifeh; Jacob Shelly; Phil Gordon  
**Cc:** Amitav Chakraborty; Steve Irving; John Adcock; Leah Aden; Nora Ahmed; Atkins, Robert A; Sarah Brannon; Cleary, Yahnnes; coninej@scwllp.com; Jared Evans; Jonathan Hurwitz; ernestjohnson@lacapfund.com; Sophia Lln Lakin; Stephanie Willis; Sara Rohani; Kathryn Sadasivan; Adam Savitt; Daniel Sinnreich; msnider@slls.org; Alora Thomas-Lundborg; john@scwllp.com; Victoria Wenger; crasto@lawbr.net; acullens@lawbr.net; cullens@lawbr.net; Jonathan Hawley; Abha Khanna; laynelee@lawbr.net; Lali Madduri; Alison (Qizhou) Ge; Cassie Holt; John Branch; brungardm@ag.louisiana.gov; Tom Farr; Dallin Holt; duhona@ag.state.la.us; lagrouea@ag.louisiana.gov; JonesCar@ag.louisiana.gov; Jason Torchinsky; mcphes@ag.louisiana.gov; plewis@bakerlaw.com; kmcknight@bakerlaw.com; Brennan Bowen; walej@ag.state.la.us; mmengis@bakerlaw.com; MurrillE@ag.louisiana.gov; eprouty@bakerlaw.com; Phil Strach  
**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Stuart,

We are perplexed by your changes to the proposed scheduling order. We laid out what we thought the schedule articulated by Judge Johnson to be in an email to Jacob yesterday at 2:54 PM. Jacob responded in agreement at 11:31 PM. At that point the only difference was the pre-hearing brief dates. We sent a proposal at 10:19 AM, which Jacob agreed to. The changes to the scheduling order are different than what was agreed to below. As such, it appears we don't have an agreement, and will need the Court to enter a scheduling order as referenced in Friday's status conference. We will file a notice with our schedule as articulated last week. Since it was Plaintiffs' collective decision as to whether they would elect one of the new hearing dates offered by Chief Judge Dick, we trust you will notify the Court of your intention to keep to the October 3-5 dates and your proposed schedule.

Best,  
Alyssa



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**From:** Stuart Naifeh <snaifeh@naacpldf.org>  
**Sent:** Wednesday, September 6, 2023 4:30 PM  
**To:** Alyssa Riggins <alyssa.riggins@nelsonmullins.com>; Jacob Shelly <jshelly@elias.law>; Phil Gordon

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**Subject:** Re: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

### External Source/Sender notice

Use caution responding or clicking links/attachments.

Hi Alyssa,

Please see attached plaintiffs combined edits to the motion and schedule.

**Stuart C. Naifeh** (he/him/él)  
Manager, Redistricting Project



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**From:** Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>

**Date:** Wednesday, September 6, 2023 at 4:08 PM

**To:** Jacob Shelly <[jshelly@elias.law](mailto:jshelly@elias.law)>, Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>, Phil Gordon <[pgordon@HoltzmanVogel.com](mailto:pgordon@HoltzmanVogel.com)>

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

[Caution: EXTERNAL EMAIL]

Hi Jacob,

Just wanted to follow up on below since we do have to let the Court know something today.



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**Sent:** Wednesday, September 6, 2023 1:08 PM

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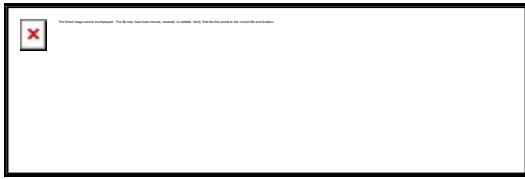


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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Jacob,

Please find attached a consent motion and scheduling order. All Defendants have signed off on this. Please let us know if this is acceptable to both the Galmon and Robinson Plaintiffs.

Best,  
Alyssa



---

**ALYSSA RIGGINS SENIOR ASSOCIATE**  
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**From:** Jacob Shelly <[jshelly@elias.law](mailto:jshelly@elias.law)>  
**Sent:** Wednesday, September 6, 2023 10:54 AM  
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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

That works for us, we are happy to see the draft consent motion when you have it ready.

Best,  
Jacob

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Hi Jacob,

Thanks for letting us know that both sets of plaintiffs would like to stick with the October 3 hearing date. We would prefer the September 29<sup>th</sup> date for the pre-trial briefs. This would make the schedule:

- Sept. 14: Serve fact witness disclosures
- Sept. 15: Defendants serve expert reports (supplemental and new)
- Sept. 18: Plaintiffs Disclose rebuttal expert witnesses
- Sept. 28: Plaintiffs serve rebuttal expert reports
- Sept. 29: Serve final witness lists, exhibit lists, pre-trial brief limited to 1 per side, at 30 pages.

If this is acceptable to you, we would propose a consent motion that notifies the court of the selected hearing date with a proposed order entering the schedule detailed above. Please let us know if you agree. If so, we are happy to prepare the filing.

Best,  
Alyssa



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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Hi Alyssa,

Thank you for your patience as we have several team members in trial. To ensure timely relief, the Robinson and Galmon plaintiffs will elect to stick with the October 3 hearing date. It sounds like we share an understanding of the pretrial deadlines the court is likely to order. Our notes reflect that the magistrate judge signaled a September 30 deadline for pretrial briefs, but we are not opposed to a September 29 deadline if the court so orders. I do not believe there are any remaining issues requiring a meet-and-confer tomorrow, but let me know if you disagree.

Best,

Jacob

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Jacob,

As an initial matter, we are concerned that after almost four days, Plaintiffs still cannot tell us whether they intend to request a continuance of the October 3<sup>rd</sup> hearing and whether they seek to submit a new map. This delay cuts against our time to meaningfully meet-and-confer about the critically important schedule in this rapidly-moving case.

Regardless, for clarity, can you confirm two points for us: (1) does your email below report the positions of all Plaintiffs, or just *Galmon* Plaintiffs? (2) Your email also does not mention the October 23 dates offered by Judge Dick. Is it your intention not to seek a date change to that week?

Our understanding based on the Friday call is that if the October 3 hearing date held that Judge Johnson would be granting Defendants' proposed schedule. Your dates match ours, but your language doesn't quite match what we have from our notes. Our collective recollection is below. I suspect we may just have a difference in language but agree in principle as to what Judge Johnson indicated Friday the schedule would be.

Defendants proposed schedule was:

- Sept. 14: Serve fact witness disclosures
- Sept. 15: Defendants serve expert reports (supplemental and new)
- Sept. 18: Plaintiffs Disclose rebuttal expert witnesses
- Sept. 28: Plaintiffs serve rebuttal expert reports

- Sept. 29: Serve final witness and exhibit lists

We note that Judge Johnson indicated that Judge Dick asked for a single trial brief for each side limited to 30 pages. We see you have proposed Saturday, September 30. Given that many of us may be traveling for the hearing, we would also be amenable to the 29<sup>th</sup> as the deadline for this too. We could also make September 30 or even October 2 work.

Best,  
Alyssa



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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Good morning,

Unfortunately, our clients are traveling and so we will not be able to confirm our position until the end of the day. If we stick with the October 3 hearing date, our understanding from the magistrate judge is that the pre-hearing deadlines will be as follows:

- Sept. 14: Serve fact witness disclosures

- Sept. 15: Serve supplemental expert reports
- Sept. 18: Disclose rebuttal expert witnesses
- Sept. 28: Serve rebuttal expert reports
- Sept. 29: Serve final witness and exhibit lists
- Sept. 30: File pre-hearing briefs

In the event that we elect the November 6 rehearing date, you are welcome to prepare a proposed prehearing schedule. We will be able to confer tomorrow to confirm if there are any areas of agreement; if there are not, we can separately propose our preferred schedules to the court well in advance of tomorrow's end-of-day filing deadline.

Best,  
Jacob

**Jacob Shelly**

Elias Law Group LLP

250 Massachusetts Ave NW Suite 400  
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**From:** Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>

**Sent:** Tuesday, September 5, 2023 8:41 AM

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Good Morning,

We are following up on our correspondence from Friday afternoon. Given that the Judge has ordered us to confer and provide the Court with an update tomorrow, we need to understand Plaintiffs position on a new date hearing date as soon as possible.

Best,  
Alyssa



---

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**Subject:** Re: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Hi Phil,

Unfortunately, we cannot.

**Stuart C. Naifeh** (he/him/él)  
Manager, Redistricting Project



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**From:** Phil Gordon <[pgordon@HoltzmanVogel.com](mailto:pgordon@HoltzmanVogel.com)>

**Date:** Friday, September 1, 2023 at 3:11 PM

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**Subject:** Re: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

[Caution: EXTERNAL EMAIL]

Stuart,

You represented before the Court earlier today that you would be able to reach a decision on if you would seek a new map. Can you please let us know your position on at least that by the end of the day?

Regards,

Phil Gordon

Phil Gordon  
Partner  
Holtzman Vogel



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On Sep 1, 2023, at 2:56 PM, Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)> wrote:

Some people who received this message don't often get email from [snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org). [Learn why this is important](#)

Hi Alyssa,

Speaking for both the Robinson and Galmon plaintiffs, we are not going to be in a position to make a proposal before Monday, unfortunately.

**Stuart C. Naifeh** (he/him/él)  
Manager, Redistricting Project

<image005.png>

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**From:** Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>

**Date:** Friday, September 1, 2023 at 2:22 PM

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

[Caution: EXTERNAL EMAIL]

Dear All,

We are writing about the schedules proposed by Judge Dick and Judge Johnson at the status conference earlier today. As we understood it, Plaintiffs are going to confer about the proposed new hearing dates and then if you want a new date, we need to have conferred on a schedule and get back to the court by Wednesday. To be sure that we can meet that deadline, can you please let us know your position on the proposed schedules later today?

Best,  
Alyssa



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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Alyssa,

Thanks for letting us know. The *Robinson* and *Galmon* Plaintiffs are not available at 1 pm ET, but we are available at 2 pm ET. Please let us know if that works for you.

Best,  
Amitav

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Hi Jacob and Amitav,

Thanks for getting the ball rolling on scheduling. We are not available at 11, but I believe that both counsel for the Secretary and counsel for the Legislative Intervenors are available at 1 pm EST. Would that time work on your end?



---

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The Galmon Plaintiffs are available at that time as well.

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

All,

Consistent with the court's order from yesterday, are you available to meet and confer regarding the proposed schedule ahead of the scheduling conference this afternoon? The *Robinson* Plaintiffs are available at 11 am ET to discuss.

Best,

Amitav

**Amitav Chakraborty** | Associate

**Paul, Weiss, Rifkind, Wharton & Garrison LLP**

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Phil,

The *Robinson* Plaintiffs oppose the motions as well.

Best,

Amitav

**Amitav Chakraborty** | Associate

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**Subject:** RE: Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

Good morning,

The *Galmon* Plaintiffs also oppose the motions.

Best,  
Jacob

**Jacob Shelly**

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It's opposed.

Steve Irving

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**Sent:** Wednesday, August 23, 2023 4:42:08 PM

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**Subject:** Robinson v. Ardoin - No. 22-cv-00178-SDD-SDJ (consolidated case)

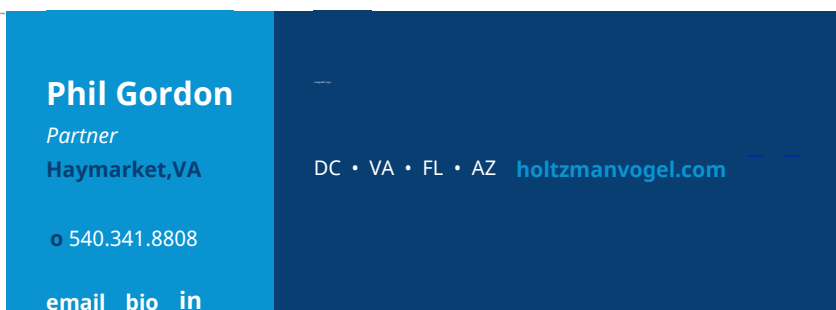
Good afternoon,

Defendants intend to file an emergency motion with the Court requesting that the remedial hearing be cancelled and a date for trial be set. We also intend to file a motion to expedite consideration of this motion.

Please let us know your position on these motions by 4:00 p.m. central time tomorrow.

Regards,

Phil Gordon



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