

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, EDGAR CAGE,  
DOROTHY NAIRNE, EDWIN RENE  
SOULE, ALICE WASHINGTON, CLEE  
EARNEST LOWE, DAVANTE LEWIS,  
MARTHA DAVIS, AMBROSE SIMS,  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE  
("NAACP") LOUISIANA STATE  
CONFERENCE, AND POWER COALITION  
FOR EQUITY AND JUSTICE,

*Plaintiffs,*

v.

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

*Defendant.*

Civil Action No. 3:22-cv-00211-SDD-RLB

EDWARD GALMON, SR., CIARA HART,  
NORRIS HENDERSON, TRAMELLE  
HOWARD,

*Plaintiffs,*

v.

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

*Defendant.*

Civil Action No. 3:22-cv-00214-SDD-RLB

**PLAINTIFFS' MOTION FOR LEAVE  
FOR EXPERT WITNESS TO TESTIFY REMOTELY**

At the hearing scheduled for October 3–5, 2023, Plaintiffs intend to call Dr. Max Palmer to provide his opinions about whether Plaintiffs' proposed remedial map will provide Black voters in Congressional District 5 an equal opportunity to elect their candidate of choice. Dr. Palmer testified in the May 2022 liability-phase hearing, but he

was not on Plaintiffs' list of anticipated expert participants in the remedial-phase hearing originally scheduled for June 2022. When this Court ordered on September 7, 2023, that parties would be permitted to submit new expert reports, ECF No. 275, Plaintiffs solicited Dr. Palmer's participation and he prepared a report that was served on September 15, 2023. Unfortunately, however, Dr. Palmer had already committed to professional obligations that preclude his ability to travel to Baton Rouge for the October hearing. Accordingly, Plaintiffs respectfully request that Dr. Palmer be permitted to testify remotely. Plaintiffs anticipate that all other witnesses will be available to testify in person.

Plaintiffs have conferred with Defendants about this motion, and Defendants state that they defer to the preference of the Court.

Date: September 25, 2023

Respectfully submitted,

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**[PROPOSED] ORDER**

Upon consideration of Plaintiffs' Motion for Leave for Expert Witness to Testify Remotely, and considering the grounds presented, it is hereby ORDERED that the motion is GRANTED. Dr. Max Palmer is permitted to testify remotely on behalf of Plaintiffs at the upcoming preliminary injunction hearing.

SO ORDERED.

This \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
United States District Judge

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United States District Judge