

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

LOUISIANA STATE CONFERENCE, OF  
THE NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF COLORED  
PEOPLE; ANTHONY ALLEN; AND  
STEPHANIE ANTHONY

Plaintiffs,

v.

STATE OF LOUISIANA; and R. KYLE  
ARDOIN, in his capacity as Secretary of  
State of Louisiana,  
Defendants.

Civil Action No. 3:19-cv-00479-JWD-EWD

**JOINT MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO FIRST AMENDED COMPLAINT  
BY DEFENDANTS, R. KYLE ARDOIN AND STATE OF LOUISIANA**

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NOW INTO COURT, through undersigned counsel, comes R. Kyle Ardoin, in his capacity as Secretary of State of Louisiana (“Secretary of State Ardoin”) and the State of Louisiana by and through Attorney General Jeff Landry (“the State”) (together “Defendants”) who respectfully move this Honorable Court for an extension of time within which to file responsive pleadings to Plaintiffs’ First Amended Complaint for Declaratory and Injunctive Relief (“First Amended Complaint”), as follows:

1.

Plaintiffs filed their First Amended Complaint on November 30, 2023. Any responsive pleading on behalf of Defendants are currently due on December 14, 2023.

2.

In their First Amended Complaint, Plaintiffs continue to seek declaratory and injunctive relief against the State of Louisiana and Secretary of State Ardoin but include alleged violations of 42 U.S.C. § 1983 as well as additional and modified factual allegations.

3.

As this Court is aware, Secretary of State Ardoin's term of office will soon end and Secretary of State Elect Nancy Landry ("Secretary of State Elect Landry") will become Louisiana's next Secretary of State.

4.

As this Court is similarly aware, Attorney General Jeff Landry's term of office will also soon end and Attorney General Elect Elizabeth Murrill ("Attorney General Elect Murrill") will become Louisiana's next Attorney General

5.

Secretary of State Elect Landry and Attorney General Murrill should be permitted sufficient time to consider proper responses to the First Amended Complaint once taking office.

6.

The claims presented by Plaintiffs in their First Amended Complaint are also of such complexity that an additional extension of time is necessary to properly investigate and respond to Plaintiffs' modified claims and factual allegations. What's more, developments in this area of the law since the filing of responsive pleadings to the original complaint further necessitate this request.

7.

This request for an extension of time is the first such request with respect to the First Amended Complaint.

8.

Granting this request for extension should not retard the progress of this matter inasmuch as all Defendants will need to respond to the pleadings before the litigation may proceed forward. Also, no deadlines under the current Scheduling Order [R. Doc. 174] should be impacted by this extension.

9.

Counsel for Plaintiffs have been contacted regarding this motion and do not oppose the relief requested herein.

10.

Therefore, for the reasons set forth in this motion and believing there exists good cause for an extension pursuant to Local Rule 7, Defendants respectfully request that the deadline for a response to the First Amended Complaint be extended an additional thirty (30) days.

WHEREFORE, Defendant, R. Kyle Ardoin, in his capacity as Secretary of State of Louisiana and Attorney General Jeff Landry, on behalf of the State of Louisiana, respectfully request that the deadline for a response to the First Amended Complaint for Declaratory and Injunctive Relief be extended an additional thirty (30) days from December 14, 2023.

Respectfully submitted:

**ATTORNEY GENERAL JEFF LANDRY SHOWS, CALI & WALSH, L.L.P.**

/s/Angelique Duhon Freel

Angelique Duhon Freel (LSBA No. 28561)  
Carey Tom Jones (LSBA No. 07474)  
Jeffrey M. Wale (LSBA No. 36070)  
Office of the Attorney General  
Louisiana Department of Justice  
1885 N. Third St.  
Baton Rouge, LA 70804  
(225) 326-6000 phone  
(225) 326-6098 fax  
[freela@ag.louisiana.gov](mailto:freela@ag.louisiana.gov)  
[walej@ag.louisiana.gov](mailto:walej@ag.louisiana.gov)  
[jonescar@ag.louisiana.gov](mailto:jonescar@ag.louisiana.gov)

/s/ John C. Walsh

John C. Walsh (LA 24903)  
Jeffrey K. Cody (LA 28536)  
Caroline M. Tomeny (LA 34120)  
628 St. Louis Street (70802)  
P.O. Box 4425  
Baton Rouge, LA 70821-4425  
Tel: 225-346-1461  
Fax: (225) 346-1467  
[john@scwllp.com](mailto:john@scwllp.com)  
[jeffreyc@scwllp.com](mailto:jeffreyc@scwllp.com)  
[caroline@scwllp.com](mailto:caroline@scwllp.com)

*Counsel for Defendant, R. Kyle Ardoin, in his capacity as Secretary of State of Louisiana*

Jason B. Torchinsky (DC 976033)\*  
Phillip M. Gordon (DC 1531277)\*  
Holtzman Vogel Baran  
Torchinsky & Josefiak, PLLC  
15405 John Marshall Highway  
Haymarket, VA 20169  
(540) 341-8808 phone  
(540) 341-8809 fax  
[jtorchinsky@holtzmanvogel.com](mailto:jtorchinsky@holtzmanvogel.com)  
[pgordon@holtzmanvogel.com](mailto:pgordon@holtzmanvogel.com)  
\*admitted *pro hac vice*

*Jeff Landry*  
*Louisiana Attorney General on behalf of the*  
*State of Louisiana*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of December, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notice of electronic filing to all counsel of record.

/s/ Caroline M. Tomeny  
Caroline M. Tomeny

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**ORDER**

Considering the foregoing *Joint Motion for Extension of Time to File Response to First Amended Complaint* by R. Kyle Ardoin and Attorney General Jeff Landry, on behalf of the State of Louisiana (“Defendants”),

**IT IS HEREBY ORDERED** that the motion is **GRANTED** and that Defendants’ deadline for a response to the First Amended Complaint for Declaratory and Injunctive Relief is extended an additional thirty (30) days from December 14, 2023.

Baton Rouge, Louisiana, this \_\_\_\_ day of December, 2023.

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The Honorable Judge John W. DeGravelles  
U.S. District Judge