

**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

**CONSENT MOTION FOR A SCHEDULING ORDER**

Counsel for Plaintiffs and Defendants in the above consolidated cases request this Court enter the following scheduling order as soon as practicable and in time to allow the Parties to prepare for trial beginning either February 5, 2024 or March 25, 2024.

The parties have agreed to the following schedule, subject to the reservations below:

1. Should the Legislature fail to enact a remedial map, consistent with the Court's October 19, 2023, order, ECF No. 301, on or before January 30, 2024;
  - a. December 22, 2023 – deadline for Plaintiffs to serve expert disclosures in accordance with Rule 26(a)(2)(B). Plaintiffs file expert reports related to illustrative maps, other than those related to Racially Polarized Voting (“RPV”) or election analysis on 2023 elections
  - b. January 5, 2024 – deadline for Parties to exchange initial list of fact and expert witnesses, except for experts performing RPV or election analysis on 2023 elections, and including any experts previously disclosed in connection with the preliminary injunction and remedial proceedings that the party may call at trial
  - c. January 12, 2024 – deadline for Parties to serve rebuttal expert reports, other than those related to RPV or election analysis on 2023 elections
  - d. January 12, 2024 – close of fact discovery
  - e. January 15, 2024 – deadline for Parties to file pre-trial motions
  - f. January 15, 2024 – deadline for the simultaneous exchange of expert reports related to RPV or election analysis on 2023 elections
  - g. January 19, 2024 – deadline for the simultaneous exchange of rebuttal expert reports related to RPV or election analysis on 2023 elections
  - h. January 22, 2024 – deadline for Parties to serve surrebuttal expert reports
  - i. January 22, 2024 – deadline for Parties to oppose any pretrial motions
  - j. January 24, 2024 – deadline for the close of expert discovery
  - k. January 26, 2024 – deadline for Parties to file dispositive motions
  - l. January 26, 2024 - deadline for Parties to exchange witness and exhibit lists for trial

- m. January 29, 2024 - final in-person pretrial conference
- n. January 30, 2024 - deadline for Parties to file witness and exhibit lists, with objections, and exchange stamped exhibits
- o. February 1, 2024 – deadline for Parties to file motions in opposition to dispositive motions
- p. February 5, 2024 – first day of trial

2. Should the Legislature enact a remedial map, consistent with the Court’s October 19, 2023 order, ECF No. 301, on or before January 30, 2024;

- a. January 30, 2024 – deadline for Parties to produce, exchange, and file enacted maps and illustrative maps
- b. February 6, 2024 – deadline for Plaintiffs to notify Court whether they oppose the new enacted map
- c. February 8, 2024 – deadline for Plaintiffs to file an Amended Complaint or supplemental complaint
- d. February 9, 2024 – deadline for the simultaneous exchange of expert reports related to the new enacted map
- e. February 16, 2024 – deadline for Defendants to respond to Plaintiffs’ Amended Complaint, if filed
- f. February 19, 2024 – deadline for the simultaneous exchange of rebuttal expert reports
- g. February 22, 2024 – close of fact and expert discovery
- h. February 23, 2024 – deadline for Parties to file pretrial motions
- i. March 1, 2024 – deadline for Parties to file oppositions to pretrial motions
- j. March 8, 2024 – deadline for Parties to file dispositive motions
- k. March 11, 2024 – deadline for Parties to exchange witness and exhibit lists
- l. March 18, 2024 – final in-person trial conference

- m. March 18, 2024 – deadline for Parties to file oppositions to dispositive motions
- n. March 19, 2024 – deadline for Parties to file witness and exhibit lists, with objections, and exchange stamped exhibits
- o. March 25, 2024 – first day of trial

**I.** *Plaintiffs' Position*

In accordance with the December 21, 2023 status conference and the Court's December 22, 2023 order, ECF No. 324, the schedule agreed upon by the Parties incorporates the opportunity for Plaintiffs to submit additional illustrative maps for the trial beginning February 5, 2024. Plaintiffs' map submissions are necessary to demonstrate and remedy the alleged violation of the Voting Rights Act that is at issue in this action.

**II.** *Defendants' Position*

Defendants object to the introduction of new illustrative maps at this late stage in litigation—which is proceeding on an expedited timeline—as prejudicial to Defendants' ability to defend against Plaintiffs' claims.

**III.** *Conclusion*

For the foregoing reasons, Plaintiffs respectfully request that this Court enter the scheduling order above.

Respectfully submitted,

/s/ Kathryn Sadasivan

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# EXHIBIT A



**UNITED STATES DISTRICT COURT  
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Civil Action No. 3:22-cv-00214-SDD-RLB

**[PROPOSED] SCHEDULING ORDER**

This Court, having heard from the parties at a status conference held on December 21,

2023, and having received the Consent Motion of all Parties in this case enters the following Scheduling Order,

**IT IS HEREBY ORDERED as follows:**

Should the Legislature fail to enact a remedial map, consistent with the Court's October 19, 2023, order, ECF No. 301, on or before January 30, 2024;

- December 22, 2023 – deadline for Plaintiffs to serve expert disclosures in accordance with Rule 26(a)(2)(B). Plaintiffs file expert reports related to illustrative maps, other than those related to Racially Polarized Voting (“RPV”) or election analysis on 2023 elections
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- March 25, 2024 – first day of trial

Signed in Baton Rouge, Louisiana, this \_\_\_\_ day of \_\_\_\_\_, 2023.

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Judge Scott D. Johnson