

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

DR. DOROTHY NAIRNE, JARRETT
LOFTON, REV. CLEE EARNEST LOWE, DR.
ALICE WASHINGTON, STEVEN HARRIS,
ALEXIS CALHOUN, BLACK VOTERS
MATTER CAPACITY BUILDING
INSTITUTE, and THE LOUISIANA STATE
CONFERENCE OF THE NAACP,

Plaintiffs,

v.

NANCY LANDRY, in her official capacity as
Secretary of State of Louisiana,

Defendant.

Civil Action No. 3:22-cv-00178
SDD-SDJ

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF
MOTION FOR SPECIAL ELECTION**

Plaintiffs seek leave to file a brief reply motion to respond to Defendants' opposition to Plaintiffs' motion for special election.

Defendants' motion raises new issues that were not addressed in Plaintiffs' motion—indeed, several of the events discussed in their opposition had not yet occurred at the time Plaintiffs filed their motion, including Defendants' notice of appeal and their motion in the alternative to stay this case. Plaintiffs seek leave to reply to brief, among other things, this Court's jurisdiction, its authority under Federal Rule of Civil Procedure 62, and the stay factors enumerated in *Nken v. Holder*, 556 U.S. 418 (2009). Moreover, because the Court's status conference to discuss the pending motions and schedule in this case was canceled, Plaintiffs also seek leave to reply regarding the State's arguments about Plaintiffs' burden and the record evidence in support of a special election, as well as to respond to Defendants' arguments about what *In re Landry*, 83 F.4th 300 (5th Cir. 2023), instructs about the appropriate schedule in this case.

Plaintiffs respectfully request that the Court grant Plaintiffs leave to file a reply motion.

Date: February 22, 2024

Respectfully submitted,

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**Practice is limited to federal court.*

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