#### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

PHILLIP CALLAIS, et al.,

Plaintiffs,

v.

Case No. 3:24-cv-00122-DCJ-CES-RRS

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

Defendant.

### GALMON MOVANTS' MOTION TO RECONSIDER ORDER DENYING INTERVENTION

In its Order denying the intervention of Edward Galmon, Sr., Ciara Hart, Norris Henderson, Tramelle Howard, and Dr. Ross Williams ("*Galmon* movants"), the Court recognized that its decision could and should be revisited if it became clear that the State Defendants were adverse to or would not adequately represent the *Galmon* movants' interests, and invited them to "seek reconsideration" under such circumstances. ECF No. 79 at 7. Pursuant to Federal Rule of Civil Procedure 54(b) and in compliance with this Court's Order, ECF No. 79, the *Galmon* movants, by and through undersigned counsel, respectfully move for reconsideration of this Court's order denying their motion to intervene. The Court should reconsider its Order denying intervention and grant Proposed Intervenors' motion to intervene as a matter of right under Rule 24(a)(2), or, in the alternative, permit them to intervene under Rule 24(b).

Respectfully submitted this March 1, 2024.

s/J.E. Cullens, Jr.

<u>s/ Abha Khanna</u>

J. E. Cullens, Jr. (LA # 23011)

Abha Khanna\* (# 917978)

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### **CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2024, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and that service will be provided through the CM/ECF system.

<u>s/ Abha Khanna</u> Abha Khanna

Counsel for Galmon Movants