

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

PHILIP CALLAIS, LLOYD PRICE, )  
BRUCE ODELL, ELIZABETH ERSOFF, )  
ALBERT CAISSIE, DANIEL WEIR, )  
JOYCE LACOUR, CANDY CARROLL )  
PEAVY, TANYA WHITNEY, MIKE )  
JOHNSON, GROVER JOSEPH REES, )  
ROLFE MCCOLLISTER, )

Plaintiffs, )

v. )

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL )  
CAPACITY AS LOUISIANA )  
SECRETARY OF STATE, )

Defendant. )

**JOINT STIPULATIONS FOR APRIL 8, 2024 BENCH TRIAL**

COME NOW Plaintiffs Philip Callais, Lloyd Price, Bruce Odell, Elizabeth Ersoff, Albert Caissie, Daniel Weir, Joyce LaCour, Candy Carroll Peavy, Tanya Whitney, Mike Johnson, Grover Joseph Rees, and Rolfe McCollister (collectively, “Plaintiffs”), as well as Defendant Secretary of State Nancy Landry, Defendant-Intervenor the State of Louisiana, and Defendant-Intervenors Press Robinson, Edgar Cage, Dorothy Nairne, Edwin Rene Soule, Alice Washington, Clee Earnest Lowe, Davante Lewis, Martha Davis, Ambrose Sims, the National Association for the Advancement of Colored People Louisiana State Conference, and the Power Coalition for Equity and Justice (collectively, “Robinson Intervenors”) (altogether, the “Parties”), by and through counsel and stipulate the following:

**The Parties**

1. Plaintiff Philip Callais is a registered voter of District 6.
2. Plaintiff Albert Caissie, Jr., is a registered voter of District 5.

3. Plaintiff Elizabeth Ersoff is a registered voter of District 6.
4. Plaintiff Grover Joseph Rees is a registered voter of District 6.
5. Plaintiff Lloyd Price is a registered voter of District 6.
6. Plaintiff Rolfe McCollister is a registered voter of District 5.
7. Plaintiff Candy Carroll Peavy is a registered voter of District 4.
8. Plaintiff Mike Johnson is a registered voter of District 4.
9. Plaintiff Bruce Odell is a registered voter of District 3.
10. Plaintiff Joyce LaCour is a registered voter of District 2.
11. Plaintiff Tanya Whitney is a registered voter of in District 1.
12. Plaintiff Danny Weir, Jr., is a registered voter of District 1.
13. Defendant Secretary of State Nancy Landry is “the chief election officer of the state.” La. Const. art. 4, § 7; La. R.S. § 18:421. The State Constitution requires her to “prepare and certify the ballots for all elections, promulgate all election returns, and administer the election laws, except those relating to voter registration and custody of voting machines.” La. Const. art. 4, § 7. Her oversight of elections extends to federal congressional elections. La. R.S. §§ 18:452, 18:462.
14. Intervenor-Defendant the State of Louisiana is represented by Attorney General Elizabeth Murrill. As Attorney General, she is Louisiana’s “chief legal officer,” is charged with “the assertion and protection of the rights and interests” of the State of Louisiana, and has a sworn duty to uphold the State’s Constitution and laws. La. Const. art. IV., § 8.
15. Robinson Intervenor-Defendants are Black Louisiana voters and civil rights organizations. They were Plaintiffs in *Robinson, et al. v. Landry*, No. 3:22-cv-02111-SDD-

SDJ (M.D. La.) which challenged Louisiana's congressional map as a violation of Section 2 of the Voting Rights Act.

Dated this 5th day of April, 2024

Respectfully submitted,

**PAUL LOY HURD, APLC**

/s/ Paul Loy Hurd

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