

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

PHILLIP 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,)	
)	Case No. 3:24-cv-00122-DCJ-CES-RRS
Plaintiffs,)	
)	
v.)	District Judge David C. Joseph
)	Circuit Judge Carl E. Stewart
NANCY LANDRY, IN HER OFFICIAL)	District Judge Robert R. Summerhays
CAPACITY AS LOUISIANA)	
SECRETARY OF STATE,)	Magistrate Judge Kayla D. McClusky
)	
Defendant.)	

**DECLARATION OF EDWARD D. GREIM IN SUPPORT OF PLAINTIFFS’ MOTION
FOR PRELIMINARY INJUNCTION**

I, Edward D. Greim, hereby declare as follows:

1. I am over 18 years of age and am competent to make this declaration.
2. I am an attorney in good standing with the Missouri bar and my application for admission pro hac vice is pending in the above-referenced matter.
3. I have personal knowledge of the statements made in this affidavit and each is true and correct.
4. I am an attorney at Graves Garrett Greim LLC.
5. I am counsel for Plaintiffs Phillip 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, in the above-captioned action and submit

this declaration to provide the Court true and correct copies of certain documents submitted in Support of Plaintiffs' Motion for Preliminary Injunction.

Exhibit A is a true and correct copy of the expert report of Michael Hefner, dated February 5, 2024.

Exhibit B is a true and correct copy of the following web page, Louisiana State Legislature, HB1 by Representative Clay Schexnayder, publicly available at <https://www.legis.la.gov/Legis/Bill.aspx?i=241484&p=true>.

Exhibit C is a true and correct copy of the following: Louisiana State Legislature, JRule 21, publicly available at <https://www.legis.la.gov/Legis/Law.aspx?d=1238755>.

Exhibit D is a true and correct copy of the following web page: Louisiana Redistricting, *Meetings, Docs, & Video Archives*, publicly available at https://redist.legis.la.gov/default_Meetings.

Exhibit E is a true and correct copy of H.B. No. 1 (ORIGINAL), 2022 1st Extraordinary Sess. (La. 2022), publicly available at <https://www.legis.la.gov/Legis/ViewDocument.aspx?d=1244898>.

Exhibit F is a true and correct copy of the following: Louisiana Redistricting, *Report – Congressional Districts by Parish – Pop (2020), VAP (2020) and Registration (12-2022)*, publicly available at https://redist.legis.la.gov/2023_07/2023CONGRESSACT5.

Exhibit G is a true and correct copy of a table of Louisiana Census Data from the U.S. Census Bureau 2020 Census, publicly available at <https://data.census.gov/table/DECENNIALCD1182020.P11?t=Voting%20and%20Registration&g=040XX00US22>.

Exhibit H is a true and correct copy of excerpts of the following: *Intervenor-Defendant the State of Louisiana's Combined Opposition to Plaintiffs' Motions for Preliminary Injunction, Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La. Apr. 29, 2022), ECF 108.

Exhibit I is a true and correct copy of the following: Press Release, *Governor Jeff Landry Assumes Office*, Office of the Governor (Jan. 8, 2024), publicly available at <https://gov.louisiana.gov/news/governor-jeff-landry-assumes-office>.

Exhibit J is a true and correct copy of the following: Governor Jeff Landry, Proclamation No. 01 JML 2024 (Jan. 8, 2024), publicly available at <https://gov.louisiana.gov/assets/Proclamations/2024/08-24-JML-Proclamation.pdf>.

Exhibit K is a true and correct copy of the following: Press Release, *Gov. Jeff Landry Opens First Special Session on Court Ordered Redistricting*, Office of the Governor (Jan. 16, 2024), publicly available at <https://gov.louisiana.gov/news/governor-jeff-landry-opens-first-special-session-on-court-ordered-redistricting>.

Exhibit L is a true and correct copy of the following web page: Louisiana State Legislature, SB8 by Senator Glen Womack, publicly available at <https://legis.la.gov/legis/Bill.aspx?i=245512&p=true>.

Exhibit M is a true and correct copy of the following: S.B. No. 8 (ORIGINAL), 2024 1st Extraordinary Sess. (La. 2024), publicly available at <https://legis.la.gov/legis/ViewDocument.aspx?d=1340141>.

Exhibit N is a true and correct copy of the following: S.B. No. 8 (ENROLLED), 2024 1st Extraordinary Sess. (La. 2024), publicly available at <https://legis.la.gov/legis/ViewDocument.aspx?d=1341081>.

Exhibit O is a true and correct copy of the following: Press Release, *Gov. Jeff Landry's First Special Session Concludes*, Office of the Governor (Jan. 19, 2024), publicly available at <https://gov.louisiana.gov/news/gov-jeff-landrys-first-special-session-concludes>.

Exhibit P is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 (SB2) 1st ES (2024) - Congressional Districts*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Statewide.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Statewide.pdf).

Exhibit Q is a true and correct copy of the following web page: Louisiana Redistricting, *Report – Congressional Districts by Parish – Pop (2020), VAP (2020), and Registration (12-2023)*, publicly available at https://redist.legis.la.gov/2024_Files/2024CONGRESSACT2.

Exhibit R is a true and correct copy of the following web page: Louisiana Redistricting, *Act 5 (HB1) 1st ES (2022) - Congressional Districts*, publicly available at [https://redist.legis.la.gov/2023_07/2023%20-%20Statewide%20Maps/Act%205%20\(HB1\)%201st%20ES%202022%20-%20Congressional%20Districts%20-%20Statewide.pdf](https://redist.legis.la.gov/2023_07/2023%20-%20Statewide%20Maps/Act%205%20(HB1)%201st%20ES%202022%20-%20Congressional%20Districts%20-%20Statewide.pdf).

Exhibit S is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Ascension*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Ascension.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Ascension.pdf).

Exhibit T is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Avoyelles*, publicly available at

[https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Avoyelles.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Avoyelles.pdf)

Exhibit U is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Caddo*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Caddo.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Caddo.pdf)

Exhibit V is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Calcasieu*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Calcasieu.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Calcasieu.pdf).

Exhibit W is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – DeSoto*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20DeSoto.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20DeSoto.pdf).

Exhibit X is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – East Baton Rouge*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20EBR.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%20%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20EBR.pdf).

Exhibit Y is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Lafayette*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Lafayette.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Lafayette.pdf).

Exhibit Z is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Orleans*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Orleans.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Orleans.pdf).

Exhibit AA is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – Rapides*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Rapides.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20Rapides.pdf).

Exhibit BB is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – St. Bernard*, publicly available at [https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20\(SB8\)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20St.%20Bernard.pdf](https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Maps/Act%202%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20St.%20Bernard.pdf).

Exhibit CC is a true and correct copy of the following web page: Louisiana Redistricting, *Act 2 - 1st ES (2024) - Congressional Districts – St. Charles*, publicly available at https://redist.legis.la.gov/2024_Files/Act2Congress/District%20and%20Split%20Parish%20Map

s/Act%20%20(SB8)%201st%20ES%202024%20-%20Congressional%20Districts%20-%20St.%20Charles.pdf.

Exhibit DD is a true and accurate copy of excerpts of Sabrina Wilson, *Gov. Landry calls special session on redistricting as new legislature takes office*, Fox 8 (Jan. 8, 2024), publicly available at <https://www.fox8live.com/2024/01/09/gov-landry-calls-special-session-redistricting-new-legislature-takes-office/>.

Exhibit EE is a true and correct copy of excerpts of Brooke Thorington, *Rep Willard to lead Louisiana House Democratic Caucus in 2024*, La. Radio Network (Dec. 1, 2023), publicly available at <https://louisianaradionetwork.com/2023/12/01/rep-willard-to-lead-louisiana-house-democratic-caucus-in-2024/>.

Exhibit FF is a true and correct copy of Press Release, *Congressman Troy Carter Demands Fair Congressional Maps*, Congressman Troy A. Carter, Sr. (Jan. 15, 2024), publicly available at <https://troycarter.house.gov/media/press-releases/congressman-troy-carter-demands-fair-congressional-maps>.

Exhibit GG is a true and correct copy of the declaration of Elizabeth Ersoff, dated February 1, 2024.

Exhibit HH is a true and correct copy of the declaration of Mike Johnson, dated February 5, 2024.

Exhibit II is a true and correct copy of the declaration of Joyce LaCour, dated February 5, 2024.

Exhibit JJ is a true and correct copy of the declaration of Rolfe McCollister, dated February 2, 2024.

Exhibit KK is a true and correct copy of the declaration of Candy Carroll Peavy, dated February 2, 2024.

Exhibit LL is a true and correct copy of the declaration of Lloyd Price dated February 2, 2024.

Exhibit MM is a true and correct copy of the declaration of Ambassador Grover Joseph Rees, III, dated February 2, 2024.

Exhibit NN is a true and correct copy of the declaration of Daniel Weir, Jr., dated February 5, 2024.

Exhibit OO is a true and correct copy of the declaration of Tanya Whitney, dated February 3, 2024.

Exhibit PP is a true and correct copy of the declaration of Bruce Odell, dated February 6, 2024.

Exhibit QQ is a true and correct copy of the declaration of Albert Caissie, Jr., dated February 5, 2024.

Exhibit RR is a true and correct copy of the declaration of Phillip Callais dated February 7, 2024.

Dated this 7th day of February, 2024

/s/ Edward D. Greim
Edward D. Greim
Missouri Bar No. 54034
Pro Hac Vice Pending
GRAVES GARRETT GREIM LLC
1100 Main Street, Suite 2700
Kansas City, Missouri 64105
Tel.: (816) 256-3181
Fax: (816) 256-5958
edgreim@gravesgarrett.com
Attorney for Plaintiffs