

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

PHILLIP CALLAIS, *et al.*,

Plaintiffs,

vs.

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

Defendant.

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

**DECLARATION OF LALITHA D. MADDURI IN SUPPORT OF
GALMON AMICI'S OPPOSITION TO
MOTION FOR PRELIMINARY INJUNCTION**

I, Lalitha D. Madduri, hereby declare under penalty of perjury under the laws of the United States as follows:

1. I am over the age of 18 and competent to make this declaration. I am a partner with the law firm Elias Law Group LLP and am admitted to practice law in the State of California and the District of Columbia and before multiple federal courts of appeals and district courts. I have been admitted pro hac vice before this Court. I serve as counsel for Edward Galmon, Sr., Ciara Hart, Norris Henderson, Tramelle Howard, and Dr. Ross Williams ("*Galmon* Amici") in the above-captioned matter.

2. I submit this declaration to provide the Court true and correct copies of certain documents submitted in opposition to Plaintiffs' motion for preliminary injunction.

Exhibit 1 is a true and correct copy of the Emergency Application for Administrative Stay, Stay Pending Appeal, and Petition for Writ of Certiorari Before Judgment of Petitioners R. Kyle Ardoin, in his official capacity as Secretary of State for Louisiana, and the State of Louisiana, by

and through Attorney General Jeff Landry in *Ardoin v. Robinson*, No. 21A814 (U.S. June 17, 2022).

Exhibit 2 is a true and correct copy of Petitioners' Letter, *Ardoin v. Robinson*, No. 21A814 (U.S. June 8, 2023).

Exhibit 3 is a true and correct copy of Petition for a Writ of Mandamus, *In re Jeff Landry*, No. 23-30642 (5th Cir. Sept. 15, 2023), ECF No. 2-1.

Exhibit 4 is a true and correct copy of Order on Petition for Rehearing En Banc, *Robinson v. Ardoin*, No. 22-30333 (5th Cir. Dec. 15, 2023), ECF No. 363-2.

Exhibit 5 is a true and correct copy of Minute Entry for 11-27-23 Status Conference, *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La. Nov. 27, 2023), ECF No. 315.

Exhibit 6 is a true and correct copy of *Governor Jeff Landry Assumes Office*, La. Off. of the Governor (Jan. 8, 2024), <https://gov.louisiana.gov/news/governor-jeff-landry-assumes-office>.

Exhibit 7 is a true and correct copy of *Governor Jeff Landry Opens First Special Session on Court Ordered Redistricting*, La. Off. of the Governor (Jan. 16, 2024), <https://gov.louisiana.gov/news/governor-jeff-landry-opens-first-special-session-on-court-ordered-redistricting>.

Exhibit 8 is a true and correct copy of Tyler Bridges, *Rep. Garrett Graves Was on Top. Now He's Fighting For His Political Life. What Happened?*, BATON ROUGE ADVOCATE (Jan. 20, 2024), https://www.nola.com/news/politics/rep-garret-graves-sees-fortunes-fall-steeply/article_c4592922-b721-11ee-bba8-c3fe4cd6a7ad.html.

Exhibit 9 is a true and correct copy of Tyler Bridges, *Garret Graves Endorses Stephen Waguespack in Louisiana Governor's Race*, BATON ROUGE ADVOCATE (June 7, 2023), https://www.nola.com/news/politics/garret-graves-endorses-stephen-waguespack-in-governors-race/article_fa443074-0559-11ee-af08-27e4fcb098fe.html.

Exhibit 10 is a true and correct copy of Greg Larose, *In Governor's Race, We'll See if 'Wags' Can Tail Top Dog Landry*, LA. ILLUMINATOR (Mar. 8, 2023), <https://lailluminator.com/2023/03/08/in-governors-race-well-see-if-wags-can-tail-top-dog-landry/>.

Exhibit 11 is a true and correct copy of Ryan Lizza, *What Steve Scalise Won't Forget*, POLITICO (Dec. 1, 2023), <https://www.politico.com/news/2023/12/01/what-steve-scalise-wont-forget-00129546>.

Exhibit 12 is a true and correct copy of Gordon Russell, *'I Know What Was Being Said': Steve Scalise Suggests Garret Graves Undercut Speaker Bid*, BATON ROUGE ADVOCATE (Dec. 1, 2023), https://www.nola.com/news/politics/i-know-what-was-being-said-steve-scalise-suggests-garret-graves-undercut-speaker-bid/article_c8fb3590-905e-11ee-86ce-4319bdb3475d.html.

Exhibit 13 is a true and correct copy of Mark Ballard, *How Did Steve Scalise's Dream for Speaker Get Squashed? Hardball Politics Are to Blame*, BATON ROUGE ADVOCATE (Oct. 23, 2023), https://www.nola.com/news/politics/steve-scalise-dream-to-be-speaker-and-by-hardball-politics/article_19431f68-6f85-11ee-ba5d-73611afd20e7.html.

Exhibit 14 is a true and correct copy of bill information for SB8, 2024 First Extraordinary Session (La. 2024), available at <https://legis.la.gov/legis/BillInfo.aspx?i=245512>.

Respectfully submitted this February 27, 2024.

J. E. Cullens, Jr. (LA # 23011)
Andrée Matherne Cullens (LA # 23212)
Stephen Layne Lee (LA # 17689)
WALTERS, THOMAS, CULLENS, LLC
12345 Perkins Road, Bldg. One
Baton Rouge, LA 70810
(225) 236-3636
cullens@lawbr.net
acullens@lawbr.net
laynelee@lawbr.net

s/ Lalitha D. Madduri

Abha Khanna* (# 917978)
ELIAS LAW GROUP LLP
1700 Seventh Ave., Suite 2100
Seattle, WA 98101
(206) 656-0177
akhanna@elias.law

Lalitha D. Madduri* (# 917979)
Jacob D. Shelly* (# 917980)
Daniel Cohen* (# 917976)
Qizhou Ge* (# 917977)
ELIAS LAW GROUP LLP
250 Massachusetts Ave. NW, Suite 400
Washington, DC 20001
(202) 968-4490
lmadduri@elias.law
jshelly@elias.law
dcohen@elias.law
age@elias.law

* Admitted *pro hac vice*

Counsel for *Galmon Amici*