

**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.)

PLAINTIFFS' STATEMENT OF ADMITTED FACTS

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"), by and through undersigned counsel and state the following admitted facts:

1. In a matter of eight days, a bill to redistrict all the congressional districts of the State of Louisiana, SB8, was introduced in the Louisiana Senate, went through Senate committee hearings, passed by a vote in the Senate, was transferred to the Louisiana House of Representatives, went through House committee hearings and amendments, was passed by a vote in the House, went back to the Senate with amendments and passed by a vote, was sent

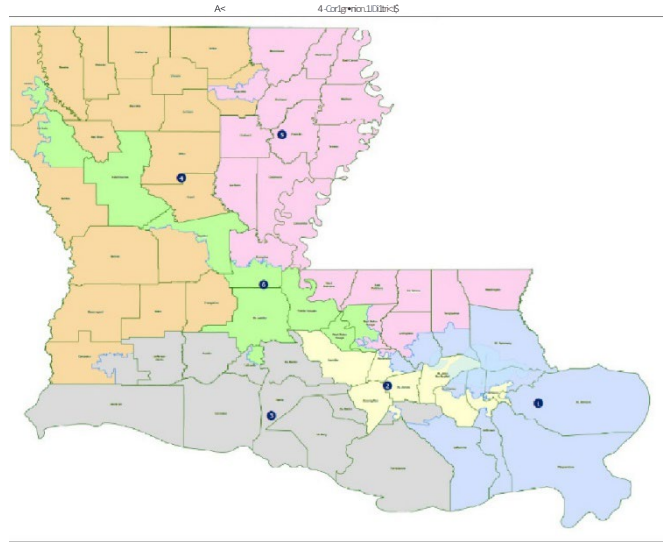
**PLAINTIFFS'
EXHIBIT**

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to the Governor's desk, and was signed by the Governor. (Doc. 1, at ¶ Intro.1; admitted at Doc. 74, 83,84).¹

2. The following is a true and accurate copy of the map enacted by SB8:



(Doc. 1, at ¶ 3; admitted at Doc. 74,83,84).

3. Plaintiffs are entitled to have their case decided by a three-judge district court panel because this action challenges “the constitutionality of the apportionment of congressional districts.” 28 U.S.C. § 2284(a). (Doc. 1, at ¶ Jurisdiction 2; admitted at Doc. 74,83,84).

4. During its 2021 legislative session, the Louisiana State Legislature received the 2020 decennial census data and learned that the State of Louisiana would continue to have six congressional districts. (Doc. 1, at ¶ SOF1; admitted at Doc. 74,83,84).

5. The census data revealed that 31.25% of the voting-age population was African American. (Doc. 1, at ¶ SOF2; admitted at Doc. 74,83,84).

¹ Because Plaintiffs’ Complaint (Doc. 1) repeats its numbering, this document will identify the section of each paragraph citation.

6. The Louisiana Legislature then adopted a joint rule to establish redistricting criteria. La. Leg. J.R. 21A. From October 2021 to January 2022, the Legislature held public meetings to solicit comments on redistricting maps. Then after this extensive process, the Legislature convened. On February 1, 2022, both Chambers presented identical redistricting bills. After weeks of deliberation and debate, the bills passed in each Chamber. Louisiana Governor John Bel Edwards vetoed the two bills, but the Legislature overrode the veto for the House bill, and it became law on March 30, 2022. (Doc. 1, at ¶SOF3; admitted at Doc. 74,83,84).

7. On March 9, 2022, some voters filed a lawsuit against the Louisiana Secretary of State and sought a preliminary injunction. The State of Louisiana intervened. (Doc. 1, at ¶SOF4; admitted at Doc. 74,83,84).

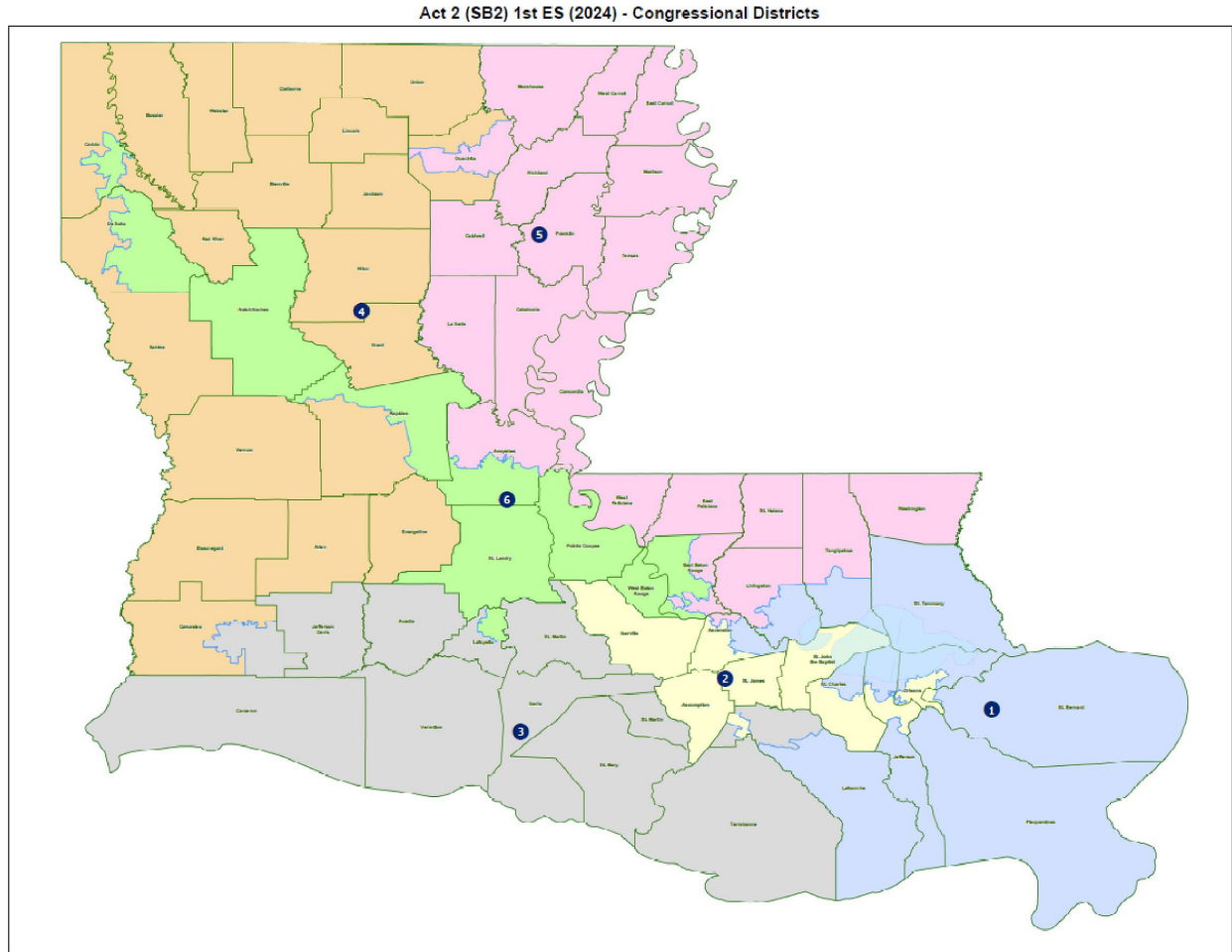
8. Defendant Nancy Landry was elected to serve as Louisiana Secretary of State in November 2023 and assumed office on January 8, 2024. (Doc. 1, at ¶SOF11; admitted at Doc. 74,83,84).

9. Jeff Landry, who previously defended the State as Attorney General, was elected to serve as Louisiana Governor in November 2023 and assumed office on January 8, 2024. (Doc. 1, at ¶SOF12; admitted at Doc. 74,83,84).

10. SB8 repealed La. R.S. § 18:1276—the State’s congressional redistricting map enacted on March 30, 2022. (Doc. 1, at ¶SOF16; admitted at Doc. 74,83,84).

11. SB8’s final map created two majority-African American districts, Districts 2 and 6, and four majority-non-African American districts, Districts 1, 3, 4, and 5. (Doc. 1, at ¶SOF17; admitted at Doc. 74,83,84).

12. That map, as laid out in the legislative reports, is included here:



(Doc. 1, at ¶SOF19; admitted at Doc. 74,83,84).

13. Baton Rouge and Shreveport are roughly 250 miles apart. (Doc. 1, at ¶SOF24; admitted at Doc. 74,83,84).

14. SB8 gave African Americans a majority, as measured by the BVAP criterion, in Districts 2 and 6. (Doc. 1, at ¶SOF44; admitted at Doc. 74,83,84)

15. SB8 passed in the Louisiana Senate on January 17, 2024, by a vote of 27-11. (Doc. 1, at ¶SOF58; admitted at Doc. 74,83,84).

16. SB8 was then transferred and presented in the Louisiana House of Representatives on January 17, 2024. SB8 went to the Committee on House and Governmental Affairs that same day. (Doc. 1, at ¶SOF59; admitted at Doc. 74,83,84).

17. SB8 then went to a vote, and it passed in the Louisiana House of Representatives by a vote of 86-16 on January 19, 2024. (Doc. 1, at ¶SOF65; admitted at Doc. 74,83,84).

18. SB8 was then sent to the Senate with House amendments, and it passed by a vote of 27-11 on January 19, 2024. (Doc. 1, at ¶SOF66; admitted at Doc. 74,83,84).

19. The following Monday, January 22, 2024, the Governor signed SB8 into law. Upon his signature, SB8 went into effect and repealed the 2022 redistricting law. (Doc. 1, at ¶SOF73; admitted at Doc. 74,83,84).

20. The entire process—from the first introduction of SB8 until the Governor signed it into law—took eight days. (Doc. 1, at ¶SOF74; admitted at Doc. 74,83,84).

Dated: April 2, 2024

PAUL LOY HURD, APLC

/s/ Paul Loy Hurd

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that, on this 2nd day of April 2024, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Edward D. Greim
Attorney for Plaintiffs