

**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

Paul Loy Hurd
Louisiana Bar No. 13909
Paul Loy Hurd, APLC
1896 Hudson Circle, Suite 5
Monroe, Louisiana 71201
Tel.: (318) 323-3838
paul@paulhurdlawoffice.com

GRAVES GARRETT GREIM LLC

/s/ Edward D. Greim

Edward D. Greim,* Missouri Bar No. 54034
A. Bradley Bodamer,* Missouri Bar No. 28676
Matthew Mueller*, Missouri Bar No. 70263
Jackson Tyler,* Missouri Bar No. 73115
Katherine Graves,* Missouri Bar No. 74671
*Admitted Pro Hac Vice
GRAVES GARRETT GREIM LLC
1100 Main Street, Suite 2700
Kansas City, Missouri 64105
Tel.: (816) 256-3181
Fax: (816) 256-5958
edgreim@gravesgarrett.com
bbodamer@gravesgarrett.com
mmueller@gravesgarrett.com
jtyler@gravesgarrett.com
kgraves@gravesgarrett.com

Counsel for Plaintiffs

Jason B. Torchinsky (DC Bar No. 976033)*
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIK, PLLC
2300 N Street, NW
Suite 643A
Washington, DC 20037
Tel: 202-737-8808
Email: jtorchinsky@holtzmanvogel.com

/s/ Carey Tom Jones
Carey Tom Jones (LSBA No. 07474)
Office of the Attorney General
Louisiana Department of Justice
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6000 phone
(225) 326-6098 fax
jonescar@ag.louisiana.gov

Phillip M. Gordon (VA Bar No. 95621)*
Zachary D. Henson (NY Bar No. 5907340)*
HOLTZMAN VOGEL BARAN

Counsel for Intervenor-Defendant the State of Louisiana

TORCHINSKY & JOSEFIK, PLLC
15405 John Marshall Hwy.
Haymarket, VA 20169
Telephone: (540) 341-8808
Facsimile: (540) 341-8809
Email: pgordon@holtzmanvogel.com
zhenson@holtzmanvogel.com

Brennan A.R. Bowen (AZ Bar No.
036639)*
Drew C. Ensign (DC Bar No. 976571)**
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIK, PLLC
2575 East Camelback Rd, Ste 860
Phoenix, AZ 85016
602-388-1262
Email: bbowen@holtzmanvogel.com

*admitted *pro hac vice*
***pro hac vice* motion forthcoming

/s/ Phillip J. Strach
Phillip J. Strach* (Lead Counsel)
phillip.strach@nelsonmullins.com
Thomas A. Farr*
tom.farr@nelsonmullins.com
Alyssa M. Riggins*
alyssa.riggins@nelsonmullins.com
Cassie A. Holt*
cassie.holt@nelsonmullins.com
**NELSON MULLINS RILEY &
SCARBOROUGH LLP**
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603
Telephone: (919) 329-3800
Facsimile: (919) 329-3799

/s/ John C. Walsh
John C. Walsh (Louisiana Bar Roll No. 24903)
SHOWS, CALI & WALSH, L.L.P.
628 St. Louis St. (70802)
P.O. Box 4225
Baton Rouge, LA 70821

Telephone: (225) 346-1461
Facsimile: (225) 346-5561
john@scwllp.com

**Admitted pro hac vice*

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

Tracie L. Washington
LA. Bar No. 25925
Louisiana Justice Institute
8004 Belfast Street
New Orleans, LA 70125
Tel: (504) 872-9134
tracie.washington.esq@gmail.com

John Adcock
Adcock Law LLC
3110 Canal Street
New Orleans, LA 70119
Tel: (504) 233-3125
jnadcock@gmail.com

*Counsel for Robinson Intervenors Dorothy
Nairne, Martha Davis, Clee Earnest Lowe, and
Rene Soule*

Counsel for Robinson Intervenors

Stuart Naifeh*
Kathryn Sadasivan*
Victoria Wenger*
Colin Burke*
NAACP Legal Defense and
Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
Tel: (212) 965-2200
snaifeh@naacpldf.org
ksadasivan@naacpldf.org
vwenger@naacpldf.org
cburke@naacpldf.org

R. Jared Evans
LA. Bar No. 34537
I. Sara Rohani*
NAACP Legal Defense and
Educational Fund, Inc.
700 14th Street N.W. Ste. 600
Washington, DC 20005
Tel: (202) 682-1300
jevans@naacpldf.org
srohani@naacpldf.org

Sarah Brannon*
Megan C. Keenan*
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005
sbrannon@aclu.org
mkeenana@aclu.org

Nora Ahmed
NY Bar No. 5092374 (pro hac vice
forthcoming)
ACLU Foundation of Louisiana
1340 Poydras St, Ste. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
nahmed@laaclu.org

Additional counsel for Robinson Intervenors

* Admitted pro hac vice.

**Practice is limited to federal court.

Robert A. Atkins*
Yahonnes Cleary*
Jonathan H. Hurwitz*
Amitav Chakraborty*
Adam P. Savitt*
Arielle B. McTootle*
Robert Klein*
Neil Chitrao*
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, NY 10019
Tel.: (212) 373-3000
Fax: (212) 757-3990
ratkins@paulweiss.com
ycleary@paulweiss.com
jhurwitz@paulweiss.com
achakraborty@paulweiss.com
asavitt@paulweiss.com
amctootle@paulweiss.com
rklein@paulweiss.com
nchitrao@paulweiss.com

Sophia Lin Lakin*
Garrett Muscatel*
Dayton Campbell-Harris (pro hac vice
forthcoming)*
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
slakin@aclu.org
gmuscatel@aclu.org
dcampbell-harris@aclu.org

T. Alora Thomas-Lundborg*
Daniel Hessel*
Election Law Clinic
Harvard Law School
6 Everett Street, Ste. 4105
Cambridge, MA 02138
(617) 495-5202
tthomaslundborg@law.harvard.edu
dhessel@law.harvard.edu