

Exhibit 2

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, ET AL * CIVIL ACTION
*
VERSUS * NO. 22-211-SDD
*
KYLE ARDOIN, ET AL * CONSOLIDATED WITH
*
*
EDWARD GALMON SR., ET AL * NO. 22-214-SDD
*
VERSUS * MAY 13, 2022
*
KYLE ARDOIN, ET AL * VOLUME 5 OF 5
* * * * *

MOTION FOR PRELIMINARY INJUNCTION BEFORE
THE HONORABLE SHELLY D. DICK
UNITED STATES CHIEF DISTRICT JUDGE

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09:25 1 AREAS. SO IN THE RED, THESE WOULD BE HIGH CONCENTRATION, HIGH
2 PERCENT WHITE VOTING AGE POPULATION SURROUNDED BY HIGH
3 PERCENTAGE WHITE VOTING AGE POPULATION. SO IT'S NOT THE
4 DISTRIBUTION PER SE, IT'S SHOWING A STATISTICAL SUMMARY OF A
5 COMPARISON OF OBSERVED RACIAL POPULATION IN A BLOCK COMPARED TO
6 ITS NEIGHBORS.

7 Q. OKAY. AND JUST SO I UNDERSTAND -- AND, AGAIN, I MAY BE
8 SIMPLIFYING AGAIN -- ESSENTIALLY WHAT YOU'RE TELLING US, USING
9 A MATHEMATICAL MODEL IS THAT RESIDENTIAL PATTERNS IN THESE
10 CITIES ARE HIGHLY SEGREGATED. IS THAT CORRECT?

11 A. YES.

12 Q. I HAVE NO FURTHER QUESTIONS.

13 THE COURT: IS THERE ANY REDIRECT?

14 MR. GORDON: NOTHING FROM ME, YOUR HONOR. THANK YOU.

15 THE COURT: OKAY. YOU MAY STEP DOWN.

16 THANK YOU, SIR.

17 NEXT WITNESS.

18 MR. STRACH: THANK YOU, YOUR HONOR. PHIL STRACH.

19 THE DEFENSE CALLS SHERRI HADSKEY.

20 SHERRI WHARTON HADSKEY,
21 HAVING BEEN DULY SWORN, TESTIFIED AS FOLLOWS:

22 THE DEPUTY CLERK: AND IF YOU WOULD, PLEASE, STATE
23 YOUR NAME AND SPELL IT, FOR THE RECORD.

24 THE WITNESS: SURE. SHERRI, S-H-E-R-R-I, WHARTON,
25 W-H-A-R-T-O-N, HADSKEY, H-A-D-S-K-E-Y.

DIRECT EXAMINATION

BY MR. STRACH:

Q. GOOD MORNING, MS. HADSKEY.

A. GOOD MORNING.

Q. COULD YOU TELL THE COURT WHAT YOUR CURRENT POSITION IS?

A. I AM THE COMMISSIONER OF ELECTIONS FOR THE LOUISIANA SECRETARY OF STATE.

Q. AND COULD YOU GIVE US A BRIEF OVERVIEW OF YOUR POSITION AND WHAT YOU DO?

A. I OVERSEE ELECTIONS. WE HAVE ELECTIONS OPERATIONS, ELECTIONS FIELD OPERATIONS, ELECTIONS BUSINESS, AND ELECTIONS SERVICES, AND I OVERSEE THE ADMINISTERING OF THE ELECTIONS PROCESS.

Q. ALL RIGHT.

MR. STRACH: FOREST, COULD WE PULL UP MS. HADSKEY'S AFFIDAVIT WHICH IS SOS_1?

BY MR. STRACH:

Q. MS. HADSKEY, DOES THIS APPEAR TO BE A COPY OF -- A COPY OF THE AFFIDAVIT, THE DECLARATION YOU SUBMITTED IN THIS CASE?

A. YES, IT DOES.

Q. AND DOES THIS AFFIDAVIT OUTLINE YOUR PROFESSIONAL BACKGROUND AND CURRENT DUTIES?

A. YES, IT DOES.

Q. OKAY. ALL RIGHT. THEN WE WON'T GO INTO DETAIL ON THAT.

MR. STRACH: YOU CAN TAKE IT DOWN FOR US. THANK YOU.

09:29 1 PETITION BY THAT DATE?

2 A. CORRECT. WITH ALL OF THE SIGNATURES, WHICH WILL BE
3 SUBMITTED TO THE REGISTRARS FOR VERIFICATION.

4 Q. ALL RIGHT. AND SO IS YOUR OFFICE READY AND PREPARED FOR
5 THAT DEADLINE AS OF TODAY?

6 A. WE ARE, BECAUSE THE CARDS HAVE NOTIFIED THE VOTERS WHICH
7 DISTRICTS THEY ARE IN. THE PEOPLE THAT WANT TO QUALIFY FOR --
8 BY PETITION WILL HAVE THE CORRECT AREAS THAT THEY NEED TO GET
9 THE SIGNATURES FROM.

10 Q. ALL RIGHT. WHEN IS THE QUALIFYING DEADLINE FOR
11 CONGRESSIONAL CANDIDATES WHO WANT TO PAY THE FILING FEE?

12 A. THE QUALIFYING DEADLINE IS -- WELL, QUALIFYING IS THE
13 20TH, 21ST AND 22ND OF JULY.

14 Q. ALL RIGHT. SO YOU'RE WORKING BETWEEN NOW, OBVIOUSLY, AND
15 JUNE 22ND AND JULY 20TH. WHAT KIND OF ACTIVITIES IS YOUR
16 OFFICE ENGAGED IN AND FACING BETWEEN NOW AND JULY 20TH?

17 A. SO CURRENTLY WE ARE RECEIVING THE SCHOOL BOARD PLANS TO
18 BEGIN THE PROCESS FOR REDISTRICTING WITH THE SCHOOL BOARDS,
19 WHICH IS QUITE COMPLICATED. WE ALSO HAVE 158 MUNICIPALITIES
20 THAT CAN BE REDISTRICTED AND WE ARE WAITING FOR THAT
21 INFORMATION TO COME IN AS WELL.

22 WE ARE CONDUCTING AN ELECTION ON JUNE 4TH BECAUSE OF
23 A REDISTRICTING ERROR THAT WAS MADE IN THE MARCH 26TH ELECTION
24 IN CALCASIEU PARISH. SO WE HAVE EARLY VOTING AND THE ELECTION
25 PROCESS GOING ON FOR THAT PARTICULAR AREA.

09:37 1 NOW, THE PROBLEM THAT WE HAD IN CALCASIEU STEMMED
2 FROM THE LATE CENSUS INFORMATION COMING THROUGH AND THE SHORT
3 AMOUNT OF TIME THAT THE LOCALS HAD TO GET THAT INFORMATION
4 ENTERED. AND BY DOING IT QUICKLY AND TRYING TO PROCESS
5 EVERYTHING AS FAST AS THEY COULD TO BE READY FOR QUALIFYING,
6 MISTAKES WERE MADE. SO ON ELECTION DAY, PEOPLE WERE GIVEN THE
7 WRONG BALLOT.

8 Q. ALL RIGHT. DO YOU HAVE ANY -- OBVIOUSLY, THIS IS A
9 ONCE-A-DECADE PROCESS FOR CONGRESSIONAL MAPS. DO YOU HAVE ANY
10 NEW REGISTRARS AT THE LOCAL LEVEL THIS YEAR WHO HAVE NEVER DONE
11 REDISTRICTING BEFORE?

12 A. YES. WE HAVE 19 NEW REGISTRARS THAT WILL BE DOING THIS
13 PROCESS FOR THE FIRST TIME AS THE REGISTRAR OF VOTERS.

14 Q. ALL RIGHT. AND IF YOU HAD TO PROCESS A NEW CONGRESSIONAL
15 PLAN SOME TIME BETWEEN NOW AND JULY 20TH, WOULD A NEW ROUND OF
16 NOTICES HAVE TO GO OUT TO THE VOTERS?

17 A. ABSOLUTELY.

18 Q. OKAY.

19 A. THE MOST IMPORTANT THING IS THAT THE VOTER AND THE
20 CANDIDATES KNOW THE DISTRICTS THAT THEY ARE LIVING IN AND THAT
21 THEY WILL VOTE IN.

22 Q. AND IN THE CARDS, WOULD THEY HAVE TO GO OUT WITH PLENTY OF
23 TIME FOR THE CANDIDATES TO ACTUALLY STUDY THE PLAN AND DECIDE
24 WHAT TO DO AND THE VOTERS DECIDE WHAT TO DO?

25 A. YES. YES.

09:38 1 Q. ARE THERE ANY ISSUES -- IN YOUR AFFIDAVIT, YOUR
2 DECLARATION, YOU TALKED ABOUT A PAPER SHORTAGE. WHAT DOES THAT
3 -- HOW DOES THAT PLAY INTO THIS PROCESS?

4 A. SO WE HAVE SUPPLY CHAIN SHORTAGES RIGHT NOW THAT WE ARE
5 DEALING WITH FOR ELECTIONS, ACTUALLY THE ENTIRE NATION IS
6 DEALING WITH FOR ELECTIONS. ONE OF THOSE IS THE PAPER
7 SHORTAGE. WE ATTEMPTED TO GET THE ENVELOPES FOR OUR
8 ABSENTEE-BY-MAIL PROCESS AND WE SEARCHED -- ACTUALLY THE
9 DIVISION OF ADMINISTRATION ASSISTED US IN SEARCHING THE ENTIRE
10 UNITED STATES TO TRY AND FIND THE PAPER TO PRODUCE OUR
11 ENVELOPES. THEY ALSO REACHED OUT TO CANADA. AND FORTUNATELY,
12 AT THE LAST MINUTE, WE WERE ABLE TO FIND ONE PAPER MILL THAT
13 COULD PROVIDE THE PAPER THAT WE NEED. HOWEVER, IT'S, OF
14 COURSE, AT A MUCH HIGHER RATE OF PAY, RATE OF COST.

15 Q. ALL RIGHT. SO IN LIGHT OF THE -- ALL OF THE MANY
16 ACTIVITIES YOUR OFFICE IS ENGAGED IN AND IF YOU HAD TO DO A NEW
17 CONGRESSIONAL PLAN SOME TIME WITHIN THE NEXT FEW MONTHS, WHAT'S
18 YOUR ASSESSMENT OF WHETHER YOU COULD -- YOU COULD PULL THAT OFF
19 ERROR FREE?

20 A. OH, I'M EXTREMELY CONCERNED. I'M VERY CONCERNED BECAUSE
21 WHEN YOU PUSH -- WHEN YOU PUSH PEOPLE TO TRY AND GET SOMETHING
22 DONE QUICKLY -- AND ESPECIALLY PEOPLE THAT HAVE NOT DONE THIS
23 PROCESS BEFORE, THE WORST THING YOU CAN HEAR FROM A VOTER IS,
24 "I'M LOOKING AT MY BALLOT AND I DON'T THINK IT'S RIGHT. I
25 THINK I'M IN THE WRONG DISTRICT OR I DON'T FEEL LIKE I HAVE THE

09:40 1 RIGHT RACES."

2 THE OTHER THING IS NOTIFYING THE VOTERS. I THINK WE
3 ALL CAN RELATE TO WE KNOW WHO OUR PERSON IS THAT WE VOTED FOR,
4 FOR CONGRESS OR FOR SCHOOL BOARD OR ANY RACE AND WHEN YOU GET
5 THERE AND YOU REALIZE IT'S NOT THE PERSON YOU ARE LOOKING FOR,
6 YOU'RE THINKING THAT'S WHO YOU'RE GOING TO VOTE FOR. AND THEN
7 YOU FIND OUT, "WAIT, I'M IN A DIFFERENT DISTRICT." IF WE DON'T
8 NOTIFY THEM IN ENOUGH TIME AND HAVE THAT CORRECTED, IT CAUSES
9 CONFUSION ACROSS THE BOARD. NOT JUST CONFUSION FOR THE VOTERS,
10 BUT ALSO CONFUSION FOR THE ELECTIONS ADMINISTRATORS TRYING TO
11 GO BACK AND CHECK AND DOUBLECHECK THAT WHAT THEY HAVE IS
12 CORRECT.

13 Q. ALL RIGHT. BROADLY SPEAKING, ASIDE FROM JUST ELECTION
14 ADMINISTRATION, ARE THERE ANY OTHER FACTORS THAT CONCERN YOU IN
15 CONSIDERING THE ELECTION SCHEDULE THIS YEAR?

16 A. YES. UNFORTUNATELY AND SADLY FOR THE LAST TWO YEARS, IT'S
17 BEEN THE LAST -- THE LAST TWO YEARS HAVE BEEN THE HARDEST IN MY
18 ENTIRE CAREER. I HAVE NO WAY OF KNOWING IF COVID IS GOING TO
19 COME BACK UP THIS COMING FALL. AND THAT ALONE ADDED AN
20 ADDITIONAL MASSIVE AMOUNT OF WORK ON THE LOCALS AND ON THE
21 STATE TO BE ABLE TO PROVIDE FOR SOCIAL DISTANCING, NOT HAVE
22 POLLING LOCATIONS IN NURSING FACILITIES, ET CETERA. SO I'M
23 VERY CONCERNED ABOUT THAT COMING AT US LIKE A FREIGHT TRAIN.

24 AND THEN I'M ALSO CONCERNED ABOUT -- I THINK WE ALL
25 KNOW IN 2020, WE COULD NOT FIND HAND SANITIZER. WE COULDN'T

09:49 1 Q. AND YOU WON'T KNOW WHICH CANDIDATES WILL QUALIFY TO APPEAR
2 ON THE BALLOTS FOR CONGRESSIONAL ELECTIONS UNTIL JULY 29TH AT
3 THE EARLIEST?

4 A. THAT'S CORRECT.

5 Q. THE NUMBER OF BALLOTS THE STATE NEEDS FOR THIS NOVEMBER'S
6 ELECTIONS WON'T CHANGE BASED ON THE SHAPE OF THE CONGRESSIONAL
7 DISTRICTS. CORRECT?

8 A. NO. NO, IT SHOULD NOT BASED ON THE SHAPE OF THE
9 CONGRESSIONAL DISTRICTS. IT'S BASED ON THE NUMBER OF
10 CANDIDATES THAT QUALIFY, THE NUMBER OF CONSTITUTIONAL
11 AMENDMENTS. IN OTHER WORDS, YOU MAY HAVE A ONE-PAGE BALLOT OR
12 YOU COULD HAVE A THREE-PAGE BALLOT, DEPENDING ON WHO QUALIFIES.

13 Q. RIGHT. YOU DISCUSSED ABSENTEE ENVELOPES WITH MR. STRACH,
14 I BELIEVE. NO ABSENTEE BALLOTS HAVE GONE OUT YET. IS THAT
15 CORRECT?

16 A. NOT YET.

17 Q. AND THOSE WON'T NEED TO BE PRINTED UNTIL 45 DAYS BEFORE
18 THE ELECTION?

19 A. OH, NO. WE HAVE TO HAVE THEM PRINTED WAY IN ADVANCE.
20 LOUISIANA HAS A SPECIAL ENVELOPE. IT HAS AN AFFIDAVIT FLAP ON
21 IT. IT'S UNIQUE. THERE'S NOT -- TO MY KNOWLEDGE, THERE'S NO
22 OTHER STATE OR JURISDICTION IN THE UNITED STATES THAT HAS THE
23 DETAILED FLAP THAT WE HAVE. AND IT'S VERY DIFFICULT TO PRINT.

24 WHEN WE'VE PUT IT OUT TO BID IN THE PAST, ONLY THREE
25 COMPANIES IN THE NATION WERE ABLE TO PRINT THIS PARTICULAR

09:50 1 ENVELOPE IN THE WAY THAT IT'S MADE AND THE INFORMATION THAT'S
2 ON IT. AND IN ORDER TO HAVE THEM PRINT, PROOF, PRINT ALL OF
3 THEM THAT ARE NECESSARY FOR THE PRIMARY AND THE GENERAL AND
4 THEN HAVE THEM SHIPPED TO US, THEN BREAK IT DOWN AND DISTRIBUTE
5 THEM TO THE PARISHES, WE HAVE TO RECEIVE THOSE BY AUGUST 1ST.
6 WE CAN'T RECEIVE THEM ANY LATER THAN THAT OR WE WOULDN'T BE
7 ABLE TO GET THEM OUT TO THE LOCALS TO BE ABLE TO HAVE THEM TO
8 USE.

9 Q. THANK YOU.

10 THE NUMBER OF ABSENTEE BALLOT ENVELOPES WILL NOT
11 CHANGE DEPENDING ON THE SHAPE OF THE CONGRESSIONAL DISTRICTS.
12 CORRECT?

13 A. NO. THAT WILL DEPEND ON THE NUMBER OF PEOPLE THAT APPLY
14 FOR AN ABSENTEE BALLOT AND THE NUMBER OF PEOPLE THAT APPLY FOR
15 THE PROGRAMS LIKE THE OVER 65 PROGRAM OR THE DISABILITY
16 PROGRAM; THINGS LIKE THAT.

17 Q. YOU SUGGEST THAT THE PAPER SHORTAGE MIGHT AFFECT THE
18 PRINTING OF VOTER REGISTRATION CARDS. CORRECT?

19 A. IT COULD -- IT COULD AFFECT ANY ITEM THAT WE HAVE TO
20 PRINT. FOR EXAMPLE, THE PAPER ROLLS FOR THE VOTING MACHINES,
21 THE TAPES, THE CARDS OR ANY SUPPLY. IF YOU'VE GONE TO VOTE ON
22 ELECTION DAY AND YOU WANT TO CHANGE YOUR ADDRESS OR YOU WANT TO
23 VOTE BY AFFIDAVIT OR ANY OF THE SUPPLY ITEMS. ALSO, THE POLL
24 BOOK PAGES, WE USE PAPER POLL BOOK PAGES. WE DON'T USE E-POLL
25 BOOKS, SO EVERYTHING THAT IS PAPER-RELATED, WE'RE TRYING TO