

**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,

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:24-cv-00122

Judge David C. Joseph

Circuit Judge Carl E. Stewart

Judge Robert R. Summerhays

ROBINSON INTERVENORS' MOTION TO VACATE

Robinson Intervenors hereby move to vacate the order issued by this Court on April 30, 2026 (Doc. 261) because it is inconsistent with the U.S. Supreme Court's stay of this Court's April 30, 2024 injunction (Doc. 198). Because the judgement of the Supreme Court has yet to issue, the stay remains in effect. On May 15, 2024, the Supreme Court issued an order staying this Court's injunction. The Supreme Court's order instructs that

Should the jurisdictional statement be timely filed, this order shall remain in effect pending this Court's action on the appeal. If the appeal is dismissed, or the judgment affirmed, this order shall terminate automatically. *In the event jurisdiction is noted or postponed, this order will remain in effect pending the sending down of the judgment of this Court.*

See 144 S. Ct. 1171 (2024) (emphasis added).

The Supreme Court noted probable jurisdiction in this case on November 4, 2024. Therefore, the termination of the stay is governed by the stay order's final sentence, which provides for termination of the stay *only* upon the Court issuing its judgment. That is, until the judgment issues, the stay of this Court's injunction remains in place. The Supreme Court issued its opinion on April 29, 2026, but it has not yet sent down its judgment. Accordingly, the stay is currently in effect, and the April 30, 2026 Order, which assumes injunction is no longer stayed, should be vacated.

In the ordinary course, the judgment would issue 32 days after the opinion was issued, or on May 31, 2026. Supreme Court Rule 45.3. There is currently an application to expedite the issuance of the judgment pending before the Supreme Court. *See Callais v. Louisiana*, No. 25A1197 (2026). The Supreme Court called for a response but has not yet acted on the application. Until it does, or until the 32-day period provided for in Supreme Court Rule 45.3 has expired, the injunction remains stayed.

Accordingly, this Court should vacate its April 30, 2026 order pending the Supreme Court's sending down of the judgment.

DATED: April 30, 2026

Respectfully submitted,

By: /s/ Tracie L. Washington

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

By: /s/ John Adcock

John Adcock
Adcock Law LLC
8131 Oak Street, Unit 100
New Orleans, LA 70118
Tel: (504) 233-3125
jnadcock@gmail.com

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

Counsel for the Robinson Intervenors

Stuart Naifeh (admitted pro hac vice)
Kathryn Sadasivan (admitted pro hac vice)
Victoria Wenger (admitted pro hac vice)
Colin Burke (admitted pro hac vice)
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

I. Sara Rohani (admitted pro hac vice)
NAACP Legal Defense and
Educational Fund, Inc.
700 14th Street N.W. Ste. 600
Washington, DC 20005
Tel: (202) 682-1300
srohani@naacpldf.org

T. Alora Thomas-Lundborg (admitted pro
hac vice)
Race & Law Clinic
Harvard Law School
1607 Massachusetts Ave, 3rd Fr
Cambridge, MA 02138
(617) 495-5202
tthomaslundborg@law.harvard.edu

Robert A. Atkins (admitted pro hac vice)
Yahannes Cleary (admitted pro hac vice)
Amitav Chakraborty (admitted pro hac vice)
Adam P. Savitt (admitted pro hac vice)
Arielle B. McTootle (admitted pro hac vice)
Robert Klein (admitted pro hac vice)
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
achakraborty@paulweiss.com
asavitt@paulweiss.com
amctootle@paulweiss.com
rklein@paulweiss.com

Sophia Lin Lakin (admitted pro hac vice)
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
slakin@aclu.org

Sarah Brannon (admitted pro hac vice)*
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005
sbrannon@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

*Practice is limited to federal court.