

Exhibit 5

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

DR. DOROTHY NAIRNE, et al.

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Secretary of State of Louisiana,

Defendant.

CIVIL ACTION NO. 3:22-cv-00178
SDD-SDJ

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**PLAINTIFF NAACP LOUISIANA STATE CONFERENCE'S SUPPLEMENTAL
RESPONSES & OBJECTIONS TO DEFENDANT ARDOIN'S FIRST SET OF
INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO THE ORGANIZATIONAL PLAINTIFFS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Local Rules 26.1 and 33.1, the NAACP Louisiana State Conference ("Louisiana NAACP"), by and through its undersigned counsel, hereby submit these supplemental responses and objections (together as "Supplemental Responses") to interrogatories set forth in Defendant Kyle Ardoin, in his official capacity as Louisiana Secretary of State ("Defendant Ardoin"), First Set of Interrogatories, dated July 22, 2022, without waiving any defenses that Plaintiff Louisiana NAACP has or hereafter may assert in the above-captioned action.

INTERROGATORY NO. 3

As to each Louisiana State House and State Senate District at issue in the Complaint, and for each Organizational Plaintiff, state the following identifying to which district the response relates:

- (a) *Identify the members of your organization living in each challenged district;*
- (b) *For your organization, list events, presentations, or other programs that the Organizational Plaintiff has held in each challenged district since January 2008;*
- (c) *Identify all facts and all documents on which you intend to rely to support your organization's standing with respect to each challenged district; and*
- (d) *Identify and produce any and all communications between your organization and its members in each challenged district.*

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3

Subject to and without waiving the general and specific objections to Interrogatory No. 3 asserted in Plaintiff NAACP Louisiana State Conference's Responses & Objections to Defendant Ardoin's First Set of Interrogatories and First Set of Requests for Production of Documents to the Organizational Plaintiffs, Plaintiff responds as follows:

(a) Plaintiff has identified at least one member who resides in, among others, each of the following Louisiana Senate Districts: 2, 5, 7, 8, 10, 14, 15, 17, 19, 31, 36, 38 and 39.

Plaintiff has identified at least one member who lives in, among others, each of the following Louisiana House Districts: 1, 2, 3, 4, 5, 6, 7, 8, 9, 13, 22, 25, 29, 34, 35, 36, 37, 47, 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 81, 88, and 101.

Plaintiff has identified at least one member who would reside in each of the newly created majority-Black districts or the newly unpacked majority-Black districts in Bill Cooper's June 2023 illustrative plans, including, among others, illustrative House Districts 1, 3, 4, 29, 34, 38, 57, 58, 60, 61, 63, 65, 68, 69, and 101, and illustrative Senate Districts 2, 7, 15, 17, 19, 38, 39.

DATED: September 1, 2023

Respectfully submitted,

John Adcock (La. Bar No. 30372)
Adcock Law LLC
Louisiana Bar No. 30372
3110 Canal Street
New Orleans, LA 70119
jnadcock@gmail.com

/s/ I. Sara Rohani
I. Sara Rohani*
NAACP Legal Defense & Educational Fund
700 14th Street, Suite 600
Washington, DC 20005
srohani@naacpldf.org

Ron Wilson (La. Bar No. 13575)
701 Poydras Street, Suite 4100
New Orleans, LA 70139
cabral2@aol.com

Leah Aden*
Stuart Naifeh*
Victoria Wenger*
NAACP Legal Defense & Educational Fund
40 Rector Street, 5th Floor
New York, NY 10006
laden@naacpldf.org
snaifeh@naacpldf.org
vwenger@naacpldf.org

Nora Ahmed (N.Y. Bar. No. 5092374)
ACLU Foundation of Louisiana
1340 Poydras St., Suite 2160
New Orleans, LA 70112
NAhmed@laaclu.org

Sophia Lin Lakin*
Dayton Campbell-Harris**
Luis Manuel Rico Román**
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
slakin@aclu.org
dcampbell-harris@aclu.org
lroman@aclu.org

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

Michael de Leeuw*
Amanda Giglio*
Cozen O'Connor
3 WTC, 175 Greenwich St.,
55th Floor
New York, NY 10007
MdeLeeuw@cozen.com
AGiglio@cozen.com

T. Alora Thomas-Lundborg*
Election Law Clinic
Harvard Law School
6 Everett Street, Ste. 4105
Cambridge, MA 02138
tthomaslundborg@law.harvard.edu

Josephine Bahn**
Cozen O'Connor
1200 19th Street NW
Washington, D.C. 20036
JBahn@cozen.com

Attorneys for Plaintiffs
*Admitted Pro Hac Vice
**Pro Hac Vice Motion Forthcoming

VERIFICATION OF MICHAEL MCCLANAHAN

I hereby state that the Louisiana NAACP's Supplemental Responses to Defendant Ardoin's First Set of Interrogatories and First Set of Requests for Production of Documents served on September 1, 2023, are true to the best of my knowledge and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 1, 2023:

A handwritten signature in black ink, appearing to read 'Michael McClanahan', is written over a horizontal line.

Michael McClanahan