

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 SECOND  
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.*

### **SECOND 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 and Plaintiff NAACP Louisiana State Conference's Supplemental Responses & Objections to Defendant Ardoin's First Set of Interrogatories to the Organizational Plaintiffs, Plaintiff responds as follows:

Plaintiff has reviewed membership information in conjunction with the enacted House and Senate maps and the June 2023 Illustrative House and Senate maps created by Plaintiff's expert witness, Mr. Bill Cooper. Plaintiff has identified at least one member in each part of the state in which districts dilute Black voting strength (that is, "pack" or "crack" Black voters) who could be drawn into a new majority-Black district that could be created in that area, as demonstrated by Mr. Cooper's Illustrative Plans.

Specifically, the following members of the Louisiana NAACP have consented to waive their associational privilege and disclose their names and addresses.

- a. [REDACTED], who is Black and a registered voter, resides at [REDACTED]  
[REDACTED]. [REDACTED] lives in Enacted House District 1. Enacted House District 1 is in the Caddo/Bossier area where Black voters are packed into few majority-Black House districts and cracked across others, and where an additional majority-Black district could be created, as demonstrated by Illustrative House District 1. [REDACTED]

would reside within the boundaries of Illustrative House District 1 in Mr. Cooper's June 2023 illustrative House plan. [REDACTED] is a member of the Shreveport Branch of the Louisiana NAACP.

- b. [REDACTED], who is Black and a registered voter, resides at [REDACTED]. [REDACTED] lives in Enacted House District 25. Enacted House District 25 is in the DeSoto/Natchitoches/Red River area where Black voters are packed into few majority-Black House districts and cracked across others, and where an additional majority-Black district could be created, as demonstrated by Illustrative House District 23. [REDACTED] would reside within the boundaries of Illustrative House District 23 in Mr. Cooper's June 2023 illustrative House plan. [REDACTED] is a member of the Natchitoches Branch of the Louisiana NAACP.

- c. [REDACTED], who is Black and a registered voter, resides at [REDACTED]. [REDACTED] lives in Enacted House District 34. Enacted House District 34 is in the Lake Charles area, where Black voters are packed into one majority-Black House district and cracked across others, and where an additional majority-Black district could be created, as demonstrated by Illustrative House District 38. [REDACTED] would reside within the boundaries of Illustrative House District 38 in Mr. Cooper's June 2023 illustrative House plan. [REDACTED] is a member of the Lake Charles Branch of the Louisiana NAACP.

- d. [REDACTED], who is Black and a registered voter, resides at [REDACTED]. [REDACTED] lives in Enacted House District 60. Enacted House District 60 is in the Iberville/Ascension area, where Black voters are packed into few majority-Black House districts and cracked across others, and where an additional



majority-Black district could be created, as demonstrated by Illustrative House District 60.

██████████ would reside within the boundaries of Illustrative House District 60 in Mr. Cooper's June 2023 illustrative House plan. ██████████ is a member of the Ascension Branch of the Louisiana NAACP.

- e. ██████████, who is Black and a registered voter, resides at ██████████  
██████████. ██████████ lives in Enacted House District 65. Enacted House District 65 is in the East Baton Rouge area, where Black voters are packed into few majority-Black House districts and cracked across others, and where additional majority-Black districts could be created, as demonstrated by Illustrative House Districts 65, 68, and 69. ██████████ would reside within the boundaries of Illustrative House District 65 in Mr. Cooper's June 2023 illustrative plan. ██████████ is a member of the Baton Rouge Branch of the Louisiana NAACP.

- f. ██████████, who is Black and a registered voter, resides at ██████████  
██████████. ██████████ lives in Enacted House District 68. Enacted House District 68 is in the East Baton Rouge area, where Black voters are packed into few majority-Black House districts and cracked across others, and where additional majority-Black districts could be created, as demonstrated by Illustrative House Districts 65, 68, and 69. ██████████  
██████████ would reside within the boundaries of Illustrative House District 68 in Mr. Cooper's June 2023 illustrative plan. ██████████ is a member of the Baton Rouge Branch of the Louisiana NAACP.

- g. ██████████, who is Black and a registered voter, resides at ██████████  
██████████. ██████████ lives in Enacted House District 101. Enacted House District 101 is in the East Baton Rouge area, where Black voters are packed into

few majority-Black House districts and cracked across others, and where additional majority-Black districts could be created, as demonstrated by Illustrative House Districts 65, 68, and 69. [REDACTED] would reside within the boundaries of Illustrative House District 69 in Mr. Cooper's June 2023 illustrative House plan. [REDACTED] is a member of the Baton Rouge Branch of the Louisiana NAACP.

h. [REDACTED], who is Black and a registered voter, resides at [REDACTED] [REDACTED]. [REDACTED] lives in Enacted Senate District 17. Enacted Senate District 17 is in the East Baton Rouge/Iberville/Pointe Coupee/West Baton area, where Black voters are packed into few majority-Black Senate districts and cracked across others, and where an additional majority-Black district could be created, as demonstrated by Illustrative Senate District 17. [REDACTED] would reside within the boundaries of Illustrative Senate District 17 in Mr. Cooper's June 2023 illustrative plan. [REDACTED] is a member of the New Roads/Point Coupee Branch of the Louisiana NAACP.

i. [REDACTED], who is Black and a registered voter, resides at [REDACTED] [REDACTED]. [REDACTED] lives in Enacted Senate District 8. Enacted Senate District 8 is in the Jefferson/St. Charles area, where there are no majority-Black Senate districts and Black voters are cracked across several districts, and where an additional majority-Black district could be created, as demonstrated by Illustrative Senate District 19. [REDACTED] would reside within the boundaries of Illustrative Senate District 19 in Mr. Cooper's June 2023 illustrative plan. [REDACTED] is a member of the Jefferson Branch of the Louisiana NAACP.

j. [REDACTED], who is Black and a registered voter, resides at [REDACTED] [REDACTED]. [REDACTED] lives in Enacted Senate District 38. Enacted Senate District is in the Caddo/Bossier area, where Black voters are packed into one majority-

Black Senate district and cracked across others, and where an additional majority-Black district could be created, as demonstrated by Illustrative Senate District 38. [REDACTED] would reside within the boundaries of Illustrative Senate District 38 in Mr. Cooper's June 2023 illustrative plan. [REDACTED] is a member of the Shreveport Branch of the Louisiana NAACP.

DATED: November 6, 2023

Respectfully submitted,

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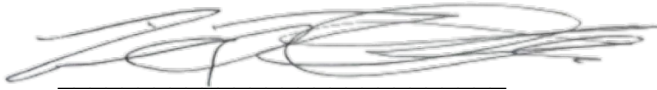
*Attorneys for Plaintiffs*  
\*Admitted Pro Hac Vice  
\*\*Pro Hac Vice Motion Forthcoming

**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 November 6, 2023:

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

Michael McClanahan