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

PRESS ROBINSON, EDGAR CAGE, DOROTHY NAIRNE, EDWIN RENÉ SOULÉ, ALICE WASHINGTON, CLEE EARNEST LOWE, DAVANTE LEWIS, MARTHA DAVIS, AMBROSE SIMS, NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE ("NAACP") LOUISIANA STATE CONFERENCE, and POWER COALITION FOR EQUITY AND JUSTICE, Plaintiffs, v. KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana, Defendant.	Case No. 3:22-cv-00211-SDD-SDJ c/w
EDWARD GALMON, SR., CIARA HART, NORRIS HENDERSON, and TRAMELLE HOWARD, Plaintiffs, v. R. KYLE ARDOIN, in his official capacity as Louisiana Secretary of State, Defendant.	Case No. 3:22-cv-00214-SDD-SDJ

DECLARATION OF DARREL J. PAPILLION IN SUPPORT OF
***GALMON* PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Darrel J. Papillion, hereby declare as follows:

1. I am over the age of 18 and competent to make this declaration. I am an attorney with the law firm Walter, Papillion, Thomas, Cullens, LLC and am admitted to practice law in the State of Louisiana. I am admitted in this Court and am counsel for Plaintiffs Edward Galmon, Sr.,

Ciara Hart, Norris Henderson, and Tramelle Howard in the above-captioned matter. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs' Motion for Preliminary Injunction:

Exhibit 1 is a true and correct copy of the expert report of William Cooper, dated April 15, 2022.

Exhibit 2 is a true and correct copy of the expert report of Dr. Maxwell Palmer, dated April 15, 2022.

Exhibit 3 is a true and correct copy of the expert report of Dr. Allan Lichtman, dated April 15, 2022.

Exhibit 4 is a true and correct copy of the declaration of Christopher J. Tyson, dated April 15, 2022.

Exhibit 5 is a true and correct copy of the declaration of Charles Cravins, dated April 15, 2022.

Exhibit 6 is a true and correct copy of the declaration of Edward Galmon, Sr., dated April 15, 2022.

Exhibit 7 is a true and correct copy of the declaration of Ciara Hart, dated April 15, 2022.

Exhibit 8 is a true and correct copy of the declaration of Norris Henderson, dated April 14, 2022.

Exhibit 9 is a true and correct copy of the declaration of Tramelle Howard, dated April 15, 2022.

Exhibit 10 is a true and correct copy of the article entitled "'When We Sue, We Win': Black Baton Rouge Residents Call for Second Majority Black Congressional District." The article was published by *The Daily Reveille* on November 21, 2021, and is publicly available at https://

www.lsureveille.com/news/when-we-sue-we-win-black-baton-rouge-residents-call-for-second-majority-black-congressional/article_35da528c-4a3d-11ec-bff3-f341498a4f66.html.

Exhibit 11 is a true and correct copy of the guest column entitled "Legislature Sought Public Input in Redistricting, but Mostly Ignored It." The guest column was published by *The Advocate* on February 23, 2022, and is publicly available at https://www.theadvocate.com/baton_rouge/opinion/article_c42f8b5a-94d0-11ec-81ec-7732dee83c2c.html.

Exhibit 12 is a true and correct copy of the article entitled "Should Louisiana Draw a Second Majority-Black Congressional District? Here's What Lawmakers Proposed." The article was published by *The Advocate* on February 1, 2022, and is publicly available at https://www.theadvocate.com/baton_rouge/news/politics/legislature/article_2324563e-83a3-11ec-9ce2-b3e0b1ee1a99.html.

Exhibit 13 is a true and correct copy of the article entitled "Louisiana House Approves Congress Map With 1 Majority Black District." The article was published by the *Louisiana Illuminator* on February 10, 2022, and is publicly available at https://lailluminator.com/2022/02/10/louisiana-house-approves-congress-map.

Exhibit 14 is a true and correct copy of the article entitled "Louisiana Senate Approves Map for Congress Without New Minority District." The article was published by the *Louisiana Illuminator* on February 8, 2022, and is publicly available https://lailluminator.com/2022/02/08/louisiana-senate-approves-map-for-congress-without-new-minority-district.

Exhibit 15 is a true and correct copy of the article entitled "Louisiana Legislature Sends Congressional Map With One Majority-Black District to Governor's Desk." The article was published by *The Advocate* on February 18, 2022, and is publicly available at https://

www.theadvocate.com/baton_rouge/news/politics/legislature/article_dd507448-90e1-11ec-bc5d-1faf116428b4.html.

Exhibit 16 is a true and correct copy of the article entitled "Gov. John Bel Edwards Says 'Fair' Congressional Maps Would Include Another Majority-Black District." The article was published by *The Advocate* on December 16, 2021, and is publicly available at https://www.theadvocate.com/baton_rouge/news/politics/legislature/article_64e99736-5ea6-11ec-bea4-2fa9f0b6f8c9.html.

Exhibit 17 is a true and correct copy of the press release entitled "Gov. Edwards Vetoes Proposed Congressional District Map, Announces Other Action on Newly Drawn District Maps." The press release was published by the Office of the Governor on March 9, 2022, and is publicly available at https://gov.louisiana.gov/index.cfm/newsroom/detail/3585.

Exhibit 18 is a true and correct copy of the letter from Governor John Bel Edwards to Speaker of the House Clay J. Schexnayder regarding the veto of House Bill 1 of the 2022 First Extraordinary Session, dated March 9, 2022. The letter was published by the Office of the Governor, was last accessed on April 11, 2022, and is publicly available at https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf.

Exhibit 19 is a true and correct copy of the article entitled "Louisiana Legislature Overrides Gov. Edwards' Veto of Congressional Map." The article was published by the *Louisiana Illuminator* on March 30, 2022, and is publicly available at https://lailluminator.com/2022/03/30/louisiana-legislature-overrides-gov-edwards-veto-of-congressional-map.

Exhibit 20 is a true and correct copy of Joint Rule No. 21. The rule was published by the Louisiana State Legislature, was last accessed on April 11, 2022, and is publicly available at https://www.legis.la.gov/Legis/Law.aspx?d=1238755.

Exhibit 21 is a true and correct copy of the article entitled "Former Leader of Klan Narrowly Wins Contest in Louisiana." The article was published by *The New York Times* on February 19, 1989, and is publicly available at https://www.nytimes.com/1989/02/19/us/former-leader-of-klan-narrowly-wins-contest-in-louisiana.html.

Exhibit 22 is a true and correct copy of the article entitled "Duke Softens Past in Louisiana Race." The article was published by *The New York Times* on September 24, 1991, and is publicly available at https://www.nytimes.com/1991/09/24/us/duke-softens-past-in-louisiana-race.html.

Exhibit 23 is a true and correct copy of the article entitled "The Numbers From Louisiana Add up Chillingly Duke's Claim on White Vote Shows Depth of Discontent." The article was published by *The Baltimore Sun* on November 17, 1991, and is publicly available at https://www.baltimoresun.com/news/bs-xpm-1991-11-18-1991322072-story.html.

Exhibit 24 is a true and correct copy of the document entitled "2022 Elections." The document was published by the Louisiana Secretary of State, was last accessed on April 11, 2022, and is publicly available at https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf.

Exhibit 25 is a true and correct copy of the webpage entitled "Session Information for the 2022 Regular Session." The webpage was published by the Louisiana State Legislature, was last accessed on April 11, 2022, and is publicly available at https://legis.la.gov/legis/SessionInfo/SessionInfo_22RS.aspx.

Exhibit 26 is a true and correct copy of Declinatory, Dilatory, & Peremptory Exceptions on Behalf of the Secretary of State to Plaintiffs' Petition for Injunctive & Declaratory Relief, *Bullman v. Ardoin*, No. C-716690 (La. 19th Jud. Dist. Ct. Mar. 16, 2022).

Exhibit 27 is a true and correct copy of Declinatory, Dilatory, & Peremptory Exceptions on Behalf of Clay Schexnayder, in His Official Capacity as Speaker of the Louisiana House of Representatives, and Patrick Page Cortez, in His Official Capacity as President of the Louisiana Senate, *Bullman v. Ardoin*, No. C-716690 (La. 19th Jud. Dist. Ct. Mar. 29, 2022).

Exhibit 28 is a true and correct copy of Motion for Stay to Be Taken up After Exception Hearing, If Exceptions Are Denied by the District Court, *Bullman v. Ardoin*, No. C-716690 (La. 19th Jud. Dist. Ct. Mar. 24, 2022).

Dated: April 15, 2022

Respectfully submitted,

By *s/Darrel J. Papillion*

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