Exhibit D

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 10, 2022
	*	
KYLE ARDOIN, ET AL	*	VOLUME 2 OF 5

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

APPEARANCES:

FOR THE ROBINSON PLAINTIFFS:

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PROCEEDINGS RECORDED BY MECHANICAL STENOGRAPHY USING COMPUTER-AIDED TRANSCRIPTION SOFTWARE

11:06 1 CONGRESSIONAL DISTRICT 6 OF THIS ENACTED MAP?
2 **A.** SURE. SO A LOT OF THE WORK THAT I DO IS WITH PEOPLE
3 WITHIN THE RIVER PARISHES: ST. JOHN, ST. JAMES, ST. CHARLES
4 AND JEFFERSON AND ORLEANS PARISH. AND SO WHEN IT COMES TIME TO
5 DISCUSS CANDIDATES AND VOTING, I'M SILENT. I HAVE NOTHING TO
6 SAY BECAUSE THEY ARE IN ONE DISTRICT AND I'M IN ANOTHER.
7 **Q.** SO UNDER CONGRESSIONAL DISTRICT 6, YOU'RE THE -- CAN YOU
8 DESCRIBE SOME OF THE PARISHES THAT YOU WOULD BE LINKED WITH
9 HERE?
10 **A.** SO ST. MARY'S, IBERVILLE, I HAVE ABSOLUTELY NO ALLIANCE
11 THERE, NO COMMUNITY MEMBERS THERE IN THOSE PARISHES.
12 **Q.** I'D LIKE TO TALK A LITTLE BIT MORE ABOUT THAT. BASED ON
13 YOUR LIVED EXPERIENCES, HOW WOULD YOU DESCRIBE SOME OF THOSE
14 COMMUNITIES THAT ARE INCLUDED ALONGSIDE YOURS HERE?
15 **A.** SO A LOT OF THE COMMUNITY WORK THAT I DO IS WITH THE RIVER
16 PARISHES WHERE WE DO A LOT OF WORK AROUND ENVIRONMENTAL JUSTICE
17 AND RACIAL JUSTICE AND LOOKING AT CANCER ALLEY AND LOOKING AT
18 JUST WHAT'S HAPPENING WITH PEOPLE'S LIVED EXPERIENCES, AS WELL
19 AS WITH HIV, WITH CRIME, AND WITH HOW WE IMPROVE EACH OTHER'S
20 LIVES.
21 SO I DON'T WORK WITH PEOPLE WITHIN TERREBONNE OR THE
22 OTHER PARISHES, SO I'M KIND OF A SORE THUMB STANDING OUT THERE
23 BECAUSE WE WORK TOGETHER, BUT THEN WE DON'T VOTE TOGETHER.
24 **Q.** I SEE. SO IT SOUNDS LIKE YOU'RE SAYING YOU'RE NOT AS
25 FAMILIAR WITH THESE -- THAT YOU'RE INCLUDED WITH?

11:09 1 DISTRICT 2 IN THIS ILLUSTRATIVE MAP. THANK YOU.
2 **BY MS. OSAKI:**
3 **Q.** DR. NAIRNE, GEOGRAPHICALLY WHAT AREAS WOULD YOU BE LINKED
4 WITH IN THIS CONGRESSIONAL DISTRICT 2 OF THIS ILLUSTRATIVE MAP?
5 **A.** IN THIS MAP I WOULD BE WITH THE PEOPLE THAT I'M WORKING
6 WITH CURRENTLY, ALONG WITH THE RIVER PARISHES, ALL THE WAY INTO
7 ORLEANS AND JEFFERSON PARISHES. THIS MAP MAKES SENSE TO ME.
8 **Q.** DO YOU HAVE ANY PERSONAL CONNECTIONS WITH ANY OF THOSE
9 OTHER PARISHES?
10 **A.** I HAVE PERSONAL CONNECTIONS: FAMILY, FRIENDS, COLLEAGUES
11 IN ALL OF THIS -- IN THIS ENTIRE AREA.
12 **Q.** HOW WOULD YOU DESCRIBE COMMUNITIES IN THESE AREAS, THESE
13 RIVER PARISH AREAS, BASED ON YOUR PERSONAL KNOWLEDGE?
14 **A.** WE HAVE A SHARED HISTORY. WE HAVE A SHARED CULTURAL
15 HERITAGE, AND WE WORK TOGETHER TO MAKE IMPROVEMENTS ALONG THIS
16 AREA WITH COMMUNITY DEVELOPMENT WHERE WE'RE DOING WORK AROUND
17 CREATING JOBS FOR PEOPLE, OPPORTUNITIES FOR YOUNG PEOPLE AND
18 TRYING TO IMPROVE OUR HEALTH.
19 **Q.** WHAT DID YOU MEAN BY THAT, "TRYING TO IMPROVE YOUR
20 HEALTH"?
21 **A.** THIS AREA IS KNOWN AS CANCER ALLEY AND JUST -- SO I'VE
22 WORKED SOMEWHAT WITH THE CANCER INDEX AND LOOKING AT JUST
23 NEIGHBORS ACROSS THE STREET, NEXT TO ME, EVEN MY OWN MOTHER
24 WHO HAD A TUMOR THE SIZE OF A SOCCER BALL IN HER BELLY. AND
25 SO, YOU KNOW, JUST CANCER IS EVERYWHERE. AND, YOU KNOW, IF

11:10 1 IT'S IN MY OWN HOUSE, THEN IS IT IN ME TOO? SO IT REALLY
2 REQUIRES US TO DO QUITE A BIT OF WORK TOGETHER.
3 **Q.** SO YOU DESCRIBE SOME OF THE HEALTH INEQUITIES THAT ARE
4 SIMILAR ALONG THE RIVER PARISHES. WHAT ABOUT INDUSTRIES? ARE
5 THERE ANY INDUSTRIES THAT ARE SIMILAR ALONG THESE COMMUNITIES?
6 **A.** WELL, THE SUGARCANE INDUSTRY DEFINED THIS AREA AND THIS
7 REGION, BUT NOW THE SUGARCANE INDUSTRY IS MECHANIZED SO PEOPLE
8 DON'T HAVE THOSE JOBS ANYMORE. SO THERE'S A LOT OF NOT MUCH TO
9 DO GOING ON IN ASSUMPTION AND ST. JAMES, ST. JOHN AND ST.
10 CHARLES.
11 **Q.** NOW, UNDER THIS NEW -- UNDER THIS ILLUSTRATIVE PLAN AND
12 BASED ON YOUR LIVED EXPERIENCES, DO YOU BELIEVE THAT YOUR
13 COMMUNITY'S INTEREST WOULD BE FAIRLY REPRESENTED?
14 **A.** UNDER THIS MAP, YES.
15 **Q.** WHY IS THAT?
16 **A.** IT WOULD GIVES US A BASE SO THAT WE CAN MOBILIZE AND SO
17 THAT WE CAN ORGANIZE AND SO THAT WE HAVE ONE COLLECTIVE VOICE
18 AND SO THAT WE WOULD HAVE ACTION TOGETHER SO THAT WE CAN MOVE
19 FORWARD AND IMPROVE NOT JUST OUR COMMUNITIES AND OUR HOUSEHOLDS
20 BUT OUR ENTIRE STATE.
21 **Q.** BASED ON YOUR LIVED EXPERIENCES AS A LOUISIANIAN, DOES IT
22 MAKE SENSE CULTURALLY, SOCIOECONOMICALLY, HISTORICALLY OR
23 OTHERWISE FOR YOUR COMMUNITY TO FALL UNDER THIS ILLUSTRATIVE
24 MAP'S CONGRESSIONAL DISTRICT 2 ALONGSIDE THESE OTHER RIVER
25 PARISH COMMUNITIES?

11:11 1 **A.** TO ME IT MAKES COMPLETE SENSE THAT WE ARE IN THIS
2 DISTRICT.
3 **Q.** THANK YOU.
4 FINALLY, DR. NAIRNE, HOW WOULD YOU FEEL IF A MAP LIKE
5 THIS ILLUSTRATIVE PLAN -- THAT IS, A MAP THAT ENACTS A SECOND
6 MAJORITY-BLACK CONGRESSIONAL DISTRICT -- WERE TO BE ENACTED
7 INTO LAW?
8 **A.** I KNOW EXACTLY THE HOUSEHOLDS THAT I'M GOING TO KNOCK ON
9 THEIR DOORS, SHOULD THIS HAPPEN. THERE WERE A NUMBER OF PEOPLE
10 -- SO DURING THE CENSUS AND LEADING UP TO THE ELECTIONS FOR
11 2020, I WAS A BLOCK CAPTAIN FOR "TOGETHER LOUISIANA." SO THERE
12 WERE A COUPLE OF HOUSEHOLDS THAT I KNOCKED ON THEIR DOORS, AND
13 THEY WERE LIKE, "OH, GOOD. YOU MEAN CHANGE IS COMING FOR US?"
14 SO THEN WHEN THEY SEE THAT, AWE, CHANGE IS NOT REAL, THEIR
15 HOPES ARE DASHED, THEY FEEL LIKE, "WOW," YET AGAIN
16 DISAPPOINTED. "YOU LIED TO ME," SOME MAN SAID. SO IT'S JUST
17 LIKE, "NO, I DIDN'T LIE TO YOU. THIS PROCESS JUST TAKES A
18 WHILE."
19 SO I KNOW I WOULD GO TO HIS HOME. THIS IS SOMEBODY
20 I'VE KNOWN ALL MY LIFE. AND JUST TO SEE THAT, YOU KNOW, HE'S
21 WEATHERED AND WORN OUT, AND JUST TO HAVE HIM HAVE A LITTLE BIT
22 OF HOPE, WOW, WOULD THAT MAKE MY YEAR, MY DAY, MY HOUR. SO
23 THAT'S WHERE I WOULD GO AND SAY, "LOOK, CHANGE IS COMING, EVEN
24 HERE TO ASSUMPTION PARISH." SO WE'D HAVE SOME HAPPY PEOPLE WHO
25 WOULD HAVE HOPE AGAIN IN LOUISIANA.

05:22 1 **A.** YES. I THINK IT'S WELL-DOCUMENTED THAT BATON ROUGE IS A
2 TALE OF TWO CITIES. YOU KNOW, BASICALLY WE HAVE THE WORST AND
3 THE BEST QUALITY OF LIFE WITHIN A FEW SQUARE MILES OF EACH
4 OTHER, IN THAT, YOU KNOW, NORTH BATON ROUGE BEING PREDOMINANTLY
5 AFRICAN AMERICAN; SOUTH BATON ROUGE BEING PREDOMINANTLY WHITE
6 AND, YOU KNOW, THE INCOME BATCHING.
7 YOU KNOW, CERTAINLY THE NORTH BATON ROUGE COMMUNITY
8 IS POOR IN MODERATE INCOME, AND SOUTH BATON ROUGE IS SO MUCH
9 MORE A WEALTHY COMMUNITY. AND THEN, YOU KNOW, ALSO TOO
10 POLITICALLY. IT'S BEEN INTERESTING BECAUSE BASICALLY VOTERS IN
11 THE STATE OF LOUISIANA -- I MEAN, IN THE CITY OF BATON ROUGE,
12 THEY BASICALLY HAVE VOTED TO SECEDE FROM NORTH BATON ROUGE, IS
13 THE BEST WAY I COULD PUT IT. IT IS CURRENTLY IN COURT.
14 BUT I MEAN, IT GIVES YOU AN IDEA OF HOW POWERFUL THAT
15 DIFFERENCE IS OR THE DIVISION BETWEEN COMMUNITIES IN EAST BATON
16 ROUGE PARISH.
17 **Q.** THANK YOU.
18 AND YOU MENTIONED THAT NORTH BATON ROUGE WAS
19 PREDOMINANTLY PEOPLE OF COLOR. WOULD YOU SAY THAT NORTH BATON
20 ROUGE HAS -- OR THE PEOPLE OF NORTH BATON ROUGE HAVE COMMON
21 NEEDS THAT GO BEYOND RACE?
22 **A.** YES.
23 **Q.** AND COULD YOU SPEAK TO THOSE NEEDS?
24 **A.** I MEAN, I THINK THAT, YOU KNOW, WE'VE -- AGAIN, SECOND --
25 YOU KNOW, LIKE WE'RE THE SECOND POOREST STATE, BUT I THINK

05:24 AFTER SOME OF THE DATA WE SAW TODAY, MAYBE WE'VE BEAT MISSISSIPPI, UNFORTUNATELY, TO BE THE POOREST STATE.

YOU KNOW, IN NORTH BATON ROUGE WE HAVE HOUSING INSECURITY. WE'VE GOT FOOD INSECURITY. WE HAVE ABSOLUTELY, YOU KNOW, FOOD DESERTS, AS WELL AS -- YOU KNOW, JUST NOT -- NO OPPORTUNITIES FOR ECONOMIC -- YOU KNOW, ECONOMIC GROWTH, AND, YOU KNOW, AND -- YEAH.

Q. THANK YOU, MS. SHELTON.

SHIFTING GEARS AGAIN, THE DEFENDANTS ARGUE THAT POLITICAL PARTY RATHER THAN RACE IS RESPONSIBLE FOR VOTING PATTERNS IN LOUISIANA. IN YOUR EXPERIENCE AS PRESIDENT AND CEO OF POWER COALITION, DO YOU FIND THAT BLACK VOTERS VOTE FOR DEMOCRATS JUST BECAUSE THEY ARE DEMOCRATS?

A. NO. I THINK THAT THEY VOTE FOR -- I MEAN, I THINK THEY VOTE FOR WHO IS GOING TO CARE ABOUT THEIR SELF-INTERESTS. DOES THAT HAPPEN TO BE DEMOCRATS? MOST OF THE TIME, MORE THAN LIKELY. HOWEVER, I THINK IT IS ALSO TRUE THAT I DON'T THINK THAT BLACK COMMUNITIES ARE SERVED WELL BY EITHER SIDE.

Q. THANK YOU, MS. SHELTON.

AND JUST ONE MORE TOPIC. WHY IS IT IMPORTANT TO POWER COALITION'S CONSTITUENTS FOR THERE TO BE AN ADDITIONAL MAJORITY-BLACK DISTRICT?

A. BECAUSE, AGAIN, I MEAN, I THINK THAT ONE OF THE THINGS THAT WAS SO BEAUTIFUL WAS THAT WHEN WE STARTED THE REDISTRICTING JOURNEY AS AN ORGANIZATION AND TRYING TO ENGAGE