Exhibit C

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 9, 2022
	*	
KYLE ARDOIN, ET AL	*	VOLUME 1 OF 5

* * * * * * * * * * * * * * * *

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

APPEARANCES:

FOR THE ROBINSON PLAINTIFFS:

NAACP LEGAL DEFENSE FUND AND EDUCATIONAL FUND, INC.
BY: STUART NAIFEH, ESQ.
KATHRYN SADASIVAN, ESQ.
VICTORIA WENGER, ESQ.
SARA ROHANI, ESQ.
40 RECTOR STREET, FIFTH FLOOR
NEW YORK, NEW YORK 10006

ADCOCK LAW, LLC
BY: JOHN ADCOCK, ESQ.
3110 CANAL STREET
NEW ORLEANS, LOUISIANA 70119

FOR THE GALMON PLAINTIFFS:

WALTERS, PAPILLION, THOMAS, CULLENS, LLC
BY: DARREL J. PAPILLION, ESQ.
12345 PERKINS ROAD, BUILDING ONE
BATON ROUGE, LOUISIANA 70810

	ELIAS LAW GROUP, LLP BY: ABHA KHANNA, ESQ. 1700 SEVENTH AVE., SUITE 2100 SEATTLE, WASHINGTON 98101
	ELIAS LAW GROUP, LLP BY: JACOB D. SHELLY, ESQ. OLIVIA N. SEDWICK, ESQ. LALITHA D. MADDURI, ESQ. 10 G STREET N.E., SUITE 600 WASHINGTON, D.C. 20002
FOR KYLE ARDOIN, IN HIS OFFICIAL CAPACITY AS SECRETARY OF STATE	SHOWS, CALI & WALSH, LLP BY: JOHN C. WALSH, ESQ. 628 ST. LOUIS STREET BATON ROUGE, LOUISIANA 70821
	NELSON MULLINS RILEY AND SCARBOROUGH, LLC BY: PHILLIP STRACH, ESQ. THOMAS A. FARR, ESQ. 4140 PARKLAKE AVENUE, SUITE 200 RALEIGH, NORTH CAROLINA 27612
FOR THE LOUISIANA LEGISLATIVE BLACK CAUCUS:	STEPHEN M. IRVING, LLC BY: STEPHEN M. IRVING, ESQ. 111 FLOUNDERS DRIVE, SUITE 700 BATON ROUGE, LOUISIANA 70810
	JOHNSON LAW FIRM BY: ERNEST L. JOHNSON, ESQ. 3313 GOVERNMENT STREET BATON ROUGE, LOUISIANA 70806
	ARTHUR THOMAS & ASSOCIATES BY: ARTHUR R. THOMAS, ESQ. 3313 GOVERNMENT STREET BATON ROUGE, LOUISIANA 70806
FOR LEGISLATIVE INTERVENORS CLAY SCHEXNAYDER AND PATRICK CORTEZ:	BAKERHOSTETLER, LLP BY: PATRICK T. LEWIS, ESQ. 127 PUBLIC SQUARE, SUITE 2000 CLEVELAND, OHIO 44114
	BAKERHOSTETLER, LLP BY: E. MARK BRADEN, ESQ. KATHERINE L. MCKNIGHT, ESQ. 1050 CONNECTICUT AVENUE, N.W., SUITE 1100 WASHINGTON, D.C. 20036

INTERVENOR DEFENDANT STATE OF LOUISIANA:

LOUISIANA'S OFFICE OF THE ATTORNEY GENERAL
BY: JEFFREY M. WALE, ESQ.
ANGELIQUE D. FREEL, ESQ.
CAREY TOM JONES, ESQ.
1885 NORTH THIRD STREET
BATON ROUGE, LOUISIANA 70802

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK, PLLC
BY: PHILLIP M. GORDON, ESQ.
15405 JOHN MARSHALL HIGHWAY
HAYMARKET, VIRGINIA 20169

OFFICIAL COURT REPORTER:

SHANNON L. THOMPSON, CCR
UNITED STATES COURTHOUSE
777 FLORIDA STREET
BATON ROUGE, LOUISIANA 70801
SHANNON_THOMPSON@LAMD.USCOURTS.GOV
(225)389-3567

PROCEEDINGS RECORDED BY MECHANICAL STENOGRAPHY USING COMPUTER-AIDED TRANSCRIPTION SOFTWARE

10:23 **A.** OKAY.
Q. SO YOU WOULD ADMIT THAT A LOT OF PEOPLE LIVING IN BATON ROUGE -- LIVE HERE NOW, THEY ONCE LIVED IN NEW ORLEANS?
A. I DON'T KNOW WHERE THEY CAME FROM 'CAUSE, YOU KNOW, KATRINA AFFECTED ALMOST ALL OF LOUISIANA.
Q. SURE.
A. SO THEY COULD HAVE COME FROM A LITTLE BIT OF EVERYWHERE. I DON'T KNOW WHERE THEY CAME FROM, THOUGH.
Q. SURE. BUT YOU COULD SEE THAT SOME PEOPLE DID -- YOU KNOW, DID MOVE FROM NEW ORLEANS TO THE BATON ROUGE AREA?
A. I KNOW A FEW THAT MOVED.
MR. NAIFEH: OBJECTION. ASKED AND ANSWERED.
MR. WALE: I APOLOGIZE, YOUR HONOR. I'M MOVING ON.
BY MR. WALE:
Q. AND SO --
THE COURT: OKAY, FOLKS. IF YOU'RE GOING TO MAKE OBJECTIONS, MAKE THEM AND THEN EITHER LET ME RULE ON THEM OR IF -- I MEAN, OKAY. GO AHEAD. CARRY ON.
MR. WALE: YES, YOUR HONOR, I APOLOGIZE. I'M GOING TO MOVE ON.
THE COURT: CARRY ON.
BY MR. WALE:
Q. SO WOULD YOU SAY THAT NEW ORLEANS AND BATON ROUGE WOULD HAVE A LOT IN COMMON WITH EACH OTHER AS BOTH URBAN AREAS?
A. NO.

10:24 1 **Q.** YOU WOULD NOT.
2 WELL, IN YOUR DECLARATION YOU DO STATE THAT NEW
3 ORLEANS AND BATON ROUGE ARE DISTINCT CITIES WITH DISTINCT
4 NEEDS?
5 **A.** "DISTINCT," THAT MEANS THAT THEY HAVE THEIR OWN -- NEW
6 ORLEANS HAS ITS OWN AND BATON ROUGE HAS ITS OWN.
7 **Q.** RIGHT. AND SO FOR THAT REASON YOU THINK THAT THEY SHOULD
8 BE IN DIFFERENT CONGRESSIONAL DISTRICTS. RIGHT?
9 **A.** YEAH.
10 **Q.** AND SO MY QUESTION FOR YOU IS: DON'T ALL THE
11 CONGRESSIONAL DISTRICTS HAVE CITIES THAT ARE VERY DISTINCT FROM
12 EACH OTHER? I MEAN, FOR EXAMPLE, MONROE AND BOGALUSA ARE IN
13 THE SAME CONGRESSIONAL DISTRICT, BUT THEY HAVE VERY DISTINCT
14 NEEDS.
15 WOULD YOU AGREE TO THAT?
16 **A.** YEAH.
17 **Q.** AND WOULD YOU AGREE ABOUT LAKE CHARLES AND LAFAYETTE
18 HAVING DISTINCT NEEDS?
19 **A.** UH-HUH.
20 **Q.** AND THEN ALSO, YOU KNOW, LIKE SHREVEPORT AND MINDEN UP IN
21 NORTH LOUISIANA?
22 **A.** RIGHT.
23 **Q.** SO YOU WOULD AGREE WITH THAT.
24 I WAS INTERESTED THAT YOU HAD STATED IN YOUR
25 DECLARATION -- I DO FORGET WHERE -- THAT YOU SAID THAT YOU FEEL

03:27 1 **A.** I DO.
2 **Q.** YOU MENTIONED YOU'RE A LAWYER. WHERE DID YOU ATTEND LAW
3 SCHOOL?
4 **A.** SOUTHERN UNIVERSITY LAW CENTER IN BATON ROUGE.
5 **Q.** IN YOUR EXPERIENCE, IS IT COMMON FOR ST. LANDRY RESIDENTS
6 TO ATTEND COLLEGE OR A UNIVERSITY IN BATON ROUGE?
7 **A.** YES.
8 **Q.** DO YOU HAVE ANY OTHER PERSONAL EXPERIENCE WITH THAT?
9 **A.** YES. WE ARE NINE SIBLINGS IN MY FAMILY. OF THE NINE,
10 FIVE HAVE COLLEGE DEGREES OR POST-GRADUATE DEGREES. ALL FIVE
11 OF THOSE ATTENDED COLLEGE IN BATON ROUGE. ALSO, JUST A LOT --
12 THERE ARE A LOT OF PEOPLE I KNOW -- A LOT OF PEOPLE FROM ST.
13 LANDRY PARISH WHO ATTEND COLLEGE IN BATON ROUGE.
14 **Q.** AND WHAT DO YOU ATTRIBUTE THAT EDUCATIONAL CONNECTION TO?
15 **A.** WELL, I THINK AS FAR AS THE AFRICAN-AMERICAN COMMUNITY IS
16 CONCERNED, THAT STARTED AS THE ONLY OPTION, BECAUSE THERE WERE
17 NO INTEGRATED COLLEGES THAT PEOPLE COULD ATTEND. THERE WAS
18 GRAMBLING, BUT GRAMBLING IS IN NORTHWEST LOUISIANA AND
19 VIRTUALLY INACCESSIBLE AT THAT TIME FROM ST. LANDRY PARISH.
20 AND THE OTHER COLLEGE IN LAFAYETTE WAS AT THE TIME
21 KNOWN AS SOUTHERN LOUISIANA INSTITUTE. SO IT WAS A REGIONAL
22 COLLEGE AND JUST DIDN'T HAVE THE PRESTIGE THAT LSU HAD AND
23 CONTINUES TO HAVE IN LOUISIANA.
24 AND SO FROM THAT NECESSITY, I GUESS, FROM THE
25 SEGREGATION AND THE EDUCATIONAL OPPORTUNITIES, IT'S BECOME SORT

03:28 1 OF A TRADITION FOR PEOPLE TO ATTEND IN BATON ROUGE.
2 **Q.** IN ADDITION TO THE EDUCATIONAL TIES, ARE THERE OTHER
3 ECONOMIC TIES THAT LINK ST. LANDRY PARISH WITH BATON ROUGE?
4 **A.** DEFINITELY.
5 **Q.** CAN YOU DESCRIBE THAT?
6 **A.** ALL OF SOUTH LOUISIANA IS VERY INVOLVED AND, IN SOME
7 EXTENT, DEPENDENT UPON THE PETROCHEMICAL INDUSTRY, AND
8 PARTICULARLY AS IT RELATES TO OFFSHORE DRILLING AND REFINING.
9 AND SO THERE ARE A LOT OF JOBS IN THAT INDUSTRY.
10 MY FATHER, FOR INSTANCE, BELONGED TO BATON ROUGE
11 LOCAL 1177, WHICH IS THE LABORERS LOCAL. AND HE AND A LOT OF
12 MEN FROM ST. LANDRY PARISH OF HIS GENERATION RODE A BUS OR
13 HITCHHIKED EVERY DAY TO BATON ROUGE TO WORK. AS A MATTER OF
14 FACT, THOSE BUSES WEREN'T COMMERCIAL BUSES. THEY WERE BUSES
15 THAT WERE SET UP SPECIFICALLY FOR THAT PURPOSE: TO BRING
16 PEOPLE TO WORK IN BATON ROUGE. SO THAT, AND, OF COURSE, WE
17 HAVE A REFINERY IN ST. LANDRY PARISH THAT'S A VERY STRONG TIE,
18 A VERY STRONG ECONOMIC TIE.
19 ALSO, THERE IS AGRICULTURAL TIES THAT -- YOU KNOW,
20 IMMEDIATELY TO THE WEST OF THE CITY OF BATON ROUGE. IF YOU ARE
21 TRAVELING UP 190 TOWARD OPELOUSAS, YOU'LL SEE SUGARCANE FIELDS
22 ALL THROUGHOUT THAT AREA, AND THAT IS A VERY IMPORTANT RURAL
23 CROP IN ST. LANDRY PARISH AND A LOT OF SOUTH LOUISIANA UP -- AS
24 I SAID, UP TO THE BORDER OF BATON ROUGE PROPER.
25 **Q.** ARE THERE SOCIAL AND CULTURAL CONNECTIONS THAT ST. LANDRY

03:30 1 PARISH SHARES WITH BATON ROUGE?
2 **A.** WELL, WE DO A ZYDECO PUBLIC AFFAIRS PROGRAM, SO -- THAT
3 PEOPLE LISTEN TO IN BATON ROUGE. AND YES, THERE ARE. THE
4 MEDIA -- I KNOW A MEDIA MARKET IS A TERM OF ART USED IN THAT
5 INDUSTRY. BUT MEDIA -- SO ST. LANDRY PARISH IS NOT PART OF THE
6 BATON ROUGE MEDIA MARKET, BUT THERE IS A GREAT DEAL OF BATON
7 ROUGE MEDIA CONSUMPTION IN ST. LANDRY PARISH.
8 WHEN YOU SUBSCRIBE FOR CABLE, FOR INSTANCE, YOU CAN
9 GET THE BATON ROUGE STATIONS. THE BATON ROUGE NEWSPAPER IS
10 VERY WIDELY READ IN ST. LANDRY PARISH. BATON ROUGE TELEVISION
11 STATIONS, RADIO STATIONS ARE VERY POPULAR IN ST. LANDRY PARISH.
12 SO THERE IS THAT CONNECTION.
13 THERE'S ALSO FAMILY CONNECTIONS THAT DERIVE FROM
14 THOSE ECONOMIC CONNECTIONS WE TALKED ABOUT EARLIER. PEOPLE GET
15 JOBS AT THE PLANTS, THEY MOVE THERE, THEIR FAMILIES GROW UP
16 THERE. I HAVE TWO DAUGHTERS WHO LIVE IN BATON ROUGE.
17 YOU ALSO HAVE THAT HISTORIC CONNECTION. I TALKED
18 ABOUT SPANISH GOVERNANCE OF LOUISIANA. BATON ROUGE AND ST.
19 LANDRY PARISH ALSO BOTH SHARE THE VESTIGES OF THAT STRONG
20 FRENCH AND SPANISH INFLUENCE ON BOTH OF THOSE AREAS, AND THE
21 FOOD. YOU KNOW, IT'S PERVASIVE. THOSE CONNECTIONS ARE
22 PERVASIVE.
23 **Q.** ANY OTHER CONNECTIONS IN RELIGION, SPORTS, OTHER THINGS
24 LIKE THAT?
25 **A.** YEAH. THE CATHOLIC CHURCH IS VERY -- THERE ARE A LOT OF

03:32 1 CATHOLICS IN SOUTH LOUISIANA, AND THE CATHOLIC CHURCH
2 HISTORICALLY HAS HAD A LOT OF INFLUENCE IN THE SOUTHERN PART OF
3 THE STATE, BOTH -- WELL, PARTICULARLY FROM A CULTURAL AND
4 SOCIAL STANDPOINT.
5 AND AS FAR AS SPORTS ARE CONCERNED, THIS IS SAINTS
6 COUNTRY. AND SO, YOU KNOW, THIS IS WHERE THE SAINTS FANS ARE.
7 **Q.** WOULD COMMUNITIES OF INTEREST BEST BE MAINTAINED BY
8 GROUPING ST. LANDRY PARISH IN A CONGRESSIONAL DISTRICT WITH
9 SHREVEPORT OR WITH BATON ROUGE?
10 **A.** DEFINITELY BATON ROUGE.
11 **Q.** WHEN WE'RE THINKING SPECIFICALLY ABOUT CONGRESSIONAL
12 REPRESENTATION, WHY IS IT IMPORTANT TO KEEP ST. LANDRY PARISH
13 WITH BATON ROUGE?
14 **A.** ST. LANDRY PARISH IS NOT A SMALL PARISH, YOU KNOW,
15 LOUISIANA -- AS FAR AS LOUISIANA PARISHES GO, BUT IT IS NOT A
16 LARGE HEAVILY-POPULATED AREA. GENERALLY MOSTLY RURAL, 13
17 MUNICIPALITIES BUT NOT DENSELY POPULATED. IN ORDER FOR ST.
18 LANDRY TO HAVE ITS FULL POLITICAL POTENTIAL, IT NEEDS TO BE
19 PAIRED WITH WHAT I CALL SOME CENTER OF INFLUENCE OR CENTERS OF
20 INFLUENCE.
21 AND THERE HAVE TRADITIONALLY BEEN MORE DENSELY --
22 THREE -- THREE MORE DENSELY POPULATED AREAS THAT ST. LANDRY HAS
23 BEEN ASSOCIATED WITH AND HAS ALIGNED WITH. AND THOSE WOULD BE
24 LAKE CHARLES, LAFAYETTE AND BATON ROUGE. AND THERE ARE NO
25 OTHER DENSELY-POPULATED AREAS THAT -- WHERE ST. LANDRY CAN

03:33 1 EXTEND AND MAGNIFY ITS INFLUENCE BY ASSOCIATING WITH THOSE
2 AREAS. IF ST. LANDRY IS CUT OFF FROM ONE OF THOSE, YOU CAN
3 MAKE IT. YOU STILL HAVE SOME VOICE BECAUSE YOU HAVE TWO
4 REMAINING. IF YOU'RE CUT OFF FROM TWO, YOU HAVE LESS OF A
5 VOICE, BUT YOU STILL -- THERE IS STILL SOME REASON FOR PEOPLE
6 TO PAY ATTENTION TO YOU. BUT WHEN YOU'RE CUT OFF FROM ALL
7 THREE, YOU ARE EFFECTIVELY DISENFRANCHISED AS FAR AS
8 CONGRESSIONAL POLITICS GO BECAUSE NOBODY CARES ABOUT YOU.
9 FOR INSTANCE, RIGHT NOW UNDER THE 2011 MAP, ST.
10 LANDRY IS DIVIDED BETWEEN THE NORTHWESTERN PART OF THE STATE
11 AND THE NORTHEASTERN PART OF THE STATE. AS FAR AS I KNOW, THE
12 CONGRESSMAN FROM SHREVEPORT HAS NEVER VISITED. HE HAS ROUGHLY
13 HALF THE GEOGRAPHIC AREA OF ST. LANDRY PARISH. I DON'T KNOW
14 THAT HE'S VISITED SINCE HE'S BEEN ELECTED.
15 NOW, I DO KNOW THAT SEVERAL DIFFERENT CONGRESS PEOPLE
16 FROM NORTHWEST LOUISIANA HAVE VISITED. SO I DON'T -- I DON'T
17 KNOW WHAT'S THE REASON FOR THAT DISPARITY. WELL, I DO HAVE
18 SOME IDEAS WHAT THE REASONS ARE FOR THAT DISPARITY, BUT THE
19 DISPARITY EXISTS.
20 **Q.** JUST FOR THE RECORD, I THINK YOU SAID PEOPLE FROM
21 NORTHWEST HAVE --
22 **A.** NO. NORTHEAST. I'M SORRY. I MEANT TO SAY FROM THE
23 NORTHEAST HAVE VISITED. FROM THE MONROE AREA, THE CURRENT
24 CONGRESSMAN IS FROM START, I BELIEVE. I KNOW SHE'S BEEN THERE,
25 WHICH IS IN THE NORTHEAST PORTION OF THE STATE. BUT THE

03:35 1 CONGRESSMAN FROM THE NORTHWEST, WHO IS FROM SHREVEPORT, AS FAR
2 AS I KNOW, HAS NEVER VISITED ST. LANDRY.
3 **Q.** ARE THERE POLICY INTERESTS THAT RESIDENTS OF ST. LANDRY
4 SHARE WITH BATON ROUGE THAT THEY DO NOT NECESSARILY SHARE WITH
5 SHREVEPORT RESIDENTS?
6 **A.** ABSOLUTELY. AND LET ME JUST -- I'LL GIVE YOU JUST A
7 COUPLE. ONE IS THE PETROCHEMICAL INDUSTRY THAT I MENTIONED
8 EARLIER, PARTICULARLY AS IT DEALS WITH REFINING AND OFFSHORE
9 OIL DRILLING. AND, YOU KNOW, THAT -- IN THE NORTHERN PART OF
10 THE STATE YOU HAVE NATURAL GAS. BUT THAT IS A DIFFERENT ANIMAL
11 FROM THE REFINERY AND OFFSHORE OIL DRILLING PETROCHEMICAL
12 BUSINESS.
13 IN THE SOUTHERN PART OF THE STATE YOU ALSO HAVE THE
14 ENVIRONMENTAL CONCERNS THAT COME WITH THOSE REFINERIES. AND
15 I'M SURE YOU'VE HEARD OF CANCER ALLEY AND THOSE TYPES OF
16 ENVIRONMENTAL CONCERNS INVOLVED WITH, YOU KNOW, AIR QUALITY AND
17 WATER QUALITY AND THAT TYPE OF THING THAT WOULD -- THAT WOULD
18 BE COMMON TO ST. LANDRY PARISH AND TO BATON ROUGE.
19 ALSO, YOU HAVE THE ISSUE OF CLIMATE AS IT RELATES TO
20 THE PETROCHEMICAL INDUSTRY, BUT YOU ALSO HAVE THE ISSUE OF
21 WEATHER AND DISASTER RELIEF. IN SOUTH LOUISIANA, DISASTER
22 RELIEF -- CONGRESSIONAL POLICY ON DISASTER RELIEF IS CRITICAL.
23 AND BATON ROUGE AND ST. LANDRY PARISH WOULD SHARE THAT; WHEREAS
24 THE NORTHERN PART OF THE STATE, PARTICULARLY NORTHWESTERN PART
25 OF THE STATE -- THE NORTHEASTERN PART OF THE STATE HAS THE

03:37 RIVER -- MISSISSIPPI RIVER. THERE ARE SOME FLOODING PROBLEMS. THERE ARE SOME DISASTER RELIEF ISSUES THAT WOULD AFFECT THAT PART.

BUT THE SOUTHERN PART, HURRICANES ARE THE THING. AND IT SEEMS THAT EVERY YEAR WE GET HIT WITH ONE, SOMETIMES MULTIPLE HURRICANES. YOU MAY HAVE SEEN IN THE NEWS IN THE LAST COUPLE OF YEARS THERE ARE SOME CONGRESS PEOPLE WHO ARE OPPOSED TO THE FEDERAL GOVERNMENT'S AGGRESSIVE RESPONSE TO DISASTER -- FEMA'S RESPONSE APPROPRIATIONS DEALING WITH DISASTER RELIEF.

IN NORTH LOUISIANA YOU MIGHT BE ABLE TO GET AWAY WITH BEING OPPOSED TO THOSE RELIEF EFFORTS. IN SOUTH LOUISIANA YOU'RE NOT GOING TO MAKE IT THROUGH THE NEXT ELECTION IF YOU ARE NOT SUPPORTING YOUR PEOPLE IN THAT DISASTER RELIEF.

Q. ARE THE CROPS THE SAME CROPS FOR --

A. ONE -- I WAS GOING TO TELL YOU ONE MORE. AND THIS ONE IS NOT AS WIDELY KNOWN, BUT I MENTIONED THE SUGARCANE FIELDS WEST OF BATON ROUGE. SUGARCANE IS AN IMPORTANT RURAL CROP IN SOUTH LOUISIANA. AND THE ISSUE OF SUGAR SUPPORTS, THAT'S SOMETHING A LOT OF PEOPLE NEVER PAY ANY ATTENTION TO. IT'S NOT AS WIDELY KNOWN AS MAYBE SOME OF THE OTHER ISSUES THAT I'VE MENTIONED. BUT THE ISSUE OF SUGAR SUPPORTS, PRICE SUPPORTS IS CRITICAL IN SOUTH LOUISIANA AND UNIMPORTANT IN THE NORTHWESTERN PART OF THE STATE.

Q. SWITCHING GEARS SLIGHTLY, HAS YOUR VOTING PRECINCT CHANGED RECENTLY?

03:57 1 FROM THOSE CENTERS OF INFLUENCE.
2 **Q.** I'M SORRY. I NEED YOU TO CLARIFY OR REPEAT SOMETHING FOR
3 ME. WHAT DID YOU SAY THE THREE CENTERS OF INFLUENCE ARE?
4 **A.** LAFAYETTE, LAKE CHARLES AND BATON ROUGE.
5 **Q.** WHAT ARE THOSE THE THREE CENTERS OF INFLUENCE OF?
6 **A.** OF POLITICAL INFLUENCE. THEY ALSO HAVE ECONOMIC
7 INFLUENCE, SOCIAL INFLUENCE. WE HAVE A CONNECTION. WE HAVE
8 SOME COMMONALITIES WITH THOSE THREE AREAS THAT RESIDENTS OF THE
9 PARISH USE TO STRENGTHEN THEIR VOICE. AS FAR -- WE'RE IN HERE
10 ON A HEARING ON AN INJUNCTION ON A POLITICAL MATTER, SO MY
11 FOCUS IS ABOUT POLITICS. AND FROM A POLITICAL STANDPOINT, ST.
12 LANDRY'S CONNECTION WITH THOSE AREAS MAGNIFIES ST. LANDRY'S
13 INFLUENCE.
14 **Q.** BUT ARE YOU SAYING THOSE ARE THE ONLY THREE CENTERS OF
15 INFLUENCE IN THE STATE?
16 **A.** EXCUSE ME?
17 **Q.** ARE YOU SAYING THOSE THREE CITIES THAT YOU NAMED ARE THE
18 ONLY THREE CENTERS OF INFLUENCE IN THE STATE OF LOUISIANA?
19 **A.** I DON'T THINK I SAID THAT.
20 **Q.** YOU SAID THOSE ARE THE THREE CENTERS OF INFLUENCE.
21 **A.** THAT ST. LANDRY PARISH HAS COMMONALITY OF INTEREST WITH.
22 **Q.** ALL RIGHT. SO SPEAKING OF COMMONALITY --
23 **A.** ST. LANDRY PARISH HAS NO COMMONALITY OF INTEREST WITH
24 SHREVEPORT. SHREVEPORT IS THE CENTER OF INFLUENCE OF THE
25 STATE. ST. LANDRY PARISH HAS LESS COMMONALITY OF INTEREST WITH

03:58 1 NEW ORLEANS THAN IT DOES WITH BATON ROUGE, LAKE CHARLES AND
2 LAFAYETTE.
3 **Q.** ALL RIGHT, MR. CRAVINS. ARE YOU FAMILIAR WITH INTERSTATE
4 49?
5 **A.** I AM.
6 **Q.** WHERE DOES INTERSTATE 49 TAKE YOU? FROM WHERE TO WHERE?
7 **A.** IT TAKES YOU FROM SHREVEPORT TO THIBODAUX AND ON TO NEW
8 ORLEANS.
9 **Q.** ALL RIGHT. DOES IT RUN THROUGH THE CENTER OF ST. LANDRY
10 PARISH?
11 **A.** YES, IT DOES.
12 **Q.** ALL RIGHT. AND SO IF I WAS GOING -- IF I WAS TRAVELING TO
13 NORTH LOUISIANA FROM THE BATON ROUGE AREA, WHAT WOULD BE THE
14 QUICKEST WAY FOR ME TO GET TO SHREVEPORT?
15 **A.** WHAT YOU FIRST DO IF YOU KNEW WHERE YOU -- WHERE YOU WERE
16 GOING AND HOW TO GET THERE MOST EXPEDITIOUSLY, IS THAT YOU
17 WOULD GO DOWN HIGHWAY 190 THROUGH ALL THOSE SUGARCANE FARMS
18 UNTIL YOU GOT TO OPELOUSAS. AND THEN YOU WOULD TAKE A RIGHT
19 AND GET ON I-49 AND YOU WOULD TRAVEL NORTH AND YOU WOULD SEE
20 THOSE SAME SUGARCANE FARMS THAT I WAS TALKING ABOUT EARLIER ON
21 YOUR RIGHT AND LEFT AS YOU WERE HEADED TOWARDS SHREVEPORT.
22 NOW, IF YOU'RE HEADED SOUTH -- IF YOU MADE A WRONG
23 TURN ON I-49 AND YOU HEADED SOUTH, YOU WOULD ALSO SEE THOSE
24 SAME SUGARCANE FARMS AND YOU WOULD SEE ASPECTS OF THE OFFSHORE
25 DRILLING INDUSTRY. IF YOU CONTINUED NORTH ON I-49 HAVING MADE

04:10 1 AND WHEN I LOOK BACK OVER MY LIFE -- I DON'T THINK I REALIZED
2 IT GROWING UP -- MANY OF THE CHANGES THAT WERE HAPPENING IN THE
3 CITY BECAUSE OF INTEGRATION AND BATON ROUGE'S KIND OF LONG
4 RESISTANCE TO IMPLEMENTING THE MANDATES OF BROWN WERE REFLECTED
5 IN MY LIFE IN THE CHANGES THAT I WOULD SEE IN THE CITY BEFORE
6 LEAVING FOR SCHOOL AND THEN COMING BACK TO FIND REALLY A TALE
7 OF TWO CITIES NARRATIVE AS WE TALK ABOUT OFTEN WITH BUILD BATON
8 ROUGE. AND I THINK RESONATES WITH MANY PEOPLE AS WE GRAPPLE
9 WITH THE ISSUES OF RACE AND CLASS STRATIFICATION IN BATON
10 ROUGE.
11 **Q.** SO I WANT TO SHIFT GEARS JUST A LITTLE BIT. HAVE YOU HAD
12 THE OPPORTUNITY TO REVIEW THE GALMON PLAINTIFFS' ILLUSTRATIVE
13 PLANS?
14 **A.** YES.
15 **Q.** AND IN YOUR VIEW, WOULD IT MAKE SENSE TO CREATE A
16 CONGRESSIONAL DISTRICT THAT CONNECTS BATON ROUGE AND THE DELTA
17 PARISHES?
18 **A.** ABSOLUTELY.
19 **Q.** AT A HIGH LEVEL, COULD YOU SHARE WITH US THE CONNECTIONS
20 THAT YOU SEE BETWEEN BATON ROUGE AND THE DELTA PARISHES?
21 **A.** WELL, BATON ROUGE IS HERE ON THE MISSISSIPPI RIVER, AND
22 LOUISIANA'S HISTORY FLOWS THROUGH THE DELTA -- AND LOUISIANA'S
23 BLACK HISTORY FLOWS THROUGH THE DELTA. IN MANY WAYS, BLACK
24 POPULATION IS STILL CENTERED AROUND THE RIVER, WHICH WE KNOW IS
25 THE SOURCE OF THE PLANTATION INDUSTRY. AND SO WE KNOW THAT

04:11 1 THOSE CONNECTIONS EXIST THROUGH FAMILY, THROUGH FAITH NETWORKS,
2 THROUGH CULTURAL EXPERIENCES. THE CONNECTION TO BATON ROUGE
3 THROUGHOUT THE DELTA AND PARTS OF CENTRAL LOUISIANA INCLUDED I
4 THINK ARE FELT IN FAMILY BONDS. I'VE SEEN IT IN MY FAMILY
5 THROUGH FAITH BONDS, AND PEOPLE TRAVEL FOR REVIVALS AND OTHER
6 EXPERIENCES THROUGHOUT THIS REGION. THERE ARE STRONG
7 CONNECTIONS. AND I KNOW MANY OTHERS WHOSE FAMILIES ARE
8 CONNECTED TO THE AREAS OF THE DELTA. AND THEY SPEND WEEKENDS
9 GOING HOME FOR DINNER AND CAN BE BACK AT WORK IN BATON ROUGE ON
10 MONDAY MORNING. SO I THINK THOSE CONNECTIONS ARE STRONG.
11 **Q.** OKAY. LET'S TAKE A FEW OF THOSE IN TURN. SO FIRST, IF
12 YOU COULD KIND OF GIVE US -- YOU'VE GIVEN US A LITTLE BIT
13 ALREADY, BUT THE FAMILIAL TIES, THE EDUCATIONAL TIES BETWEEN
14 BATON ROUGE AND THE DELTA PARISHES.
15 **A.** YEAH. AND I'LL TAKE THOSE IN REVERSE. THE EDUCATIONAL
16 TIES ARE STRONG. MY FAMILY, AS MANY OTHERS, GRANDPARENTS AND
17 GREAT GRANDPARENTS RECEIVED EDUCATION FROM MCKINLEY SENIOR HIGH
18 SCHOOL WHEN THAT WAS THE ONLY OPTION FOR PURSUING HIGH SCHOOL
19 FOR BLACK STUDENTS IN THIS REGION BEFORE CAPITOL HIGH SCHOOL
20 WOULD COME ONLINE, I BELIEVE, IN THE 1950'S. AND THEN WE HAD,
21 YOU KNOW, SLOW SCHOOL INTEGRATION AND OTHER OPTIONS.
22 AND SO MCKINLEY SENIOR HIGH SCHOOL, PEOPLE MAY NOT
23 REALIZE, WAS ONE OF THE ONLY PLACES TO PURSUE EDUCATION AFTER
24 EIGHTH GRADE FOR BLACK STUDENTS, NOT JUST IN BATON ROUGE BUT
25 THROUGHOUT THE REGION. AND I'VE MET PEOPLE WHO -- ELDERLY

04:13 1 PEOPLE WHO TALK ABOUT COMING TO BATON ROUGE TO GO TO NINTH
2 GRADE FROM THE RURAL AREAS OF THE DELTA. AND SO THAT IS
3 STRONG.
4 WE ALSO KNOW THAT SOUTHERN UNIVERSITY IS HERE, AND
5 ALSO LELAND COLLEGE USED TO BE HERE AS WELL. SO YOU HAD TWO
6 HISTORICALLY BLACK COLLEGES IN THE REGION. BOTH OF MY
7 GRANDMOTHERS ATTENDED BOTH INSTITUTIONS, AND SO -- AND THEY
8 WERE CONNECTED TO OTHERS WHO CONNECTED TO THOSE INSTITUTIONS AS
9 ROUTES TO HIGHER EDUCATION AND ONTO THE MIDDLE CLASS AS THOSE
10 INSTITUTIONS WERE VERY IMPORTANT FOR BLACK ACCESS TO THE MIDDLE
11 CLASS IN THIS REGION.
12 FAMILIAL, AGAIN, I KNOW SO MANY PEOPLE, INCLUDING MY
13 OWN FAMILY. AND THEN YOU LOOK AT THE FUNERAL PROGRAMS AND YOU
14 SEE THE CONNECTION THROUGHOUT THE DELTA AND MANY OTHERS WHO
15 STILL HAVE PARENTS AND GRANDPARENTS THROUGHOUT THE DELTA THAT
16 THEY VISIT AND CONNECT WITH ON A REGULAR BASIS, EVEN THOUGH
17 THEY RESIDE HERE IN THE CITY OF BATON ROUGE OR IN THE BROADER
18 METROPOLITAN AREA.
19 **Q.** NOW, WHAT ABOUT FROM AN ECONOMIC PERSPECTIVE, THE
20 CONNECTIONS BETWEEN BATON ROUGE AND THE DELTA PARISHES?
21 **A.** WELL, BATON ROUGE OBVIOUSLY IS THE MOST URBANIZED AREA IN
22 THE DELTA BEFORE YOU GET FURTHER DOWN TO NEW ORLEANS. THE
23 PETROCHEMICAL INDUSTRY HAS A STRONG FOOTHOLD HERE. AND THAT
24 HAS GROWN THROUGHOUT THE 20TH CENTURY.
25 ONE OF MY GREAT-GRANDFATHERS WAS ONE OF THE FIRST

04:14 1 BLACK EMPLOYEES AT EXXON. AND SO, YOU KNOW, THOSE JOBS
2 PROVIDED SOME OPPORTUNITIES FOR BLACK PEOPLE EARLY ON IN THE
3 20TH CENTURY AND CONTINUE TO DO SO TODAY. AND THOSE ARE JOBS
4 THAT NOT ONLY EXIST IN BATON ROUGE, BUT STRETCH UP THE RIVER.
5 AND THE PEOPLE WHO WORK IN THOSE INDUSTRIES LIVE ALL AROUND AND
6 COMMUTE FROM ALL AROUND THE DELTA. AND SO THERE ARE STRONG
7 ECONOMIC TIES THERE, TO SAY NOTHING OF THE GOVERNMENTAL BASE
8 HERE IN BATON ROUGE AND THE AMOUNT OF TRAVEL THAT PEOPLE ENJOY
9 WHEN THEY COMMUTE TO WORK FROM RURAL AREAS AS WE LIKE TO DO IN
10 LOUISIANA.
11 **Q.** NOW, WHAT ABOUT FROM A HISTORICAL PERSPECTIVE? YOU TALKED
12 ABOUT THE CONNECTION EARLIER, THE CONNECTION BETWEEN BATON
13 ROUGE AND THE MISSISSIPPI RIVER. SO FROM A HISTORICAL
14 PERSPECTIVE, WHAT WOULD YOU SAY?
15 **A.** THE HISTORY OF THAT, AGAIN, IS THE DELTA REGION, THE
16 PLANTATION ECONOMY TRANSFORMING INTO THE PETROCHEMICAL ECONOMY,
17 BLACK COMMUNITIES REALLY NEVER LEAVING THE PLANTATION GEOGRAPHY
18 OF LOUISIANA, STAYING CLOSE TO THE RIVER. AND THAT'S WHERE WE
19 FIND POPULATION TO THIS DAY, LITERALLY, THROUGHOUT LOUISIANA.
20 **Q.** NOW, SHIFTING GEARS AGAIN JUST A LITTLE BIT, YOU'VE ALSO
21 SEEN THE ENACTED MAP. CORRECT?
22 **A.** YES.
23 **Q.** AND WHEN VIEWING THE ENACTED MAP, IT IS YOUR UNDERSTANDING
24 THAT DISTRICT 2 LINKS BATON ROUGE AND NEW ORLEANS TOGETHER.
25 CORRECT?

04:16 1 **A.** YES.
2 **Q.** AND IN YOUR LIVED EXPERIENCE, WOULD YOU SAY THAT BATON
3 ROUGE AND NEW ORLEANS ARE -- MAKE SENSE AS COMMUNITIES JOINED
4 TOGETHER?
5 **A.** NO. IN THE WAY THAT IT IS -- IT IS CONSTRUCTED IN CD --
6 IN THE EXISTING CD2, YOU HAVE IN BATON ROUGE AND NEW ORLEANS
7 THE TWO POPULATION CENTERS OF THE STATE. AND WHILE THEY ARE AN
8 HOUR AND SOME CHANGE APART FROM EACH OTHER, THEY ARE VERY
9 DIFFERENT ECONOMIES. THEY HAVE VERY DIFFERENT HISTORIES. AND
10 THE SCALE AND SCOPE OF NEW ORLEANS' ECONOMY AND THE ISSUES IT
11 FACES -- AS IT RECEIVES OVER 30 MILLION VISITORS A YEAR IS A
12 SYMBOL FOR GLOBAL TOURISM -- ARE VERY DIFFERENT FROM THE STATE
13 CAPITAL, UNIVERSITY TOWN THAT BATON ROUGE IS.
14 I KNOW FROM MY EXPERIENCE IN SENATOR LANDRIEU'S
15 OFFICE AND ON CAPITOL HILL THE IMPORTANCE OF CONGRESSIONAL
16 REPRESENTATION TO BRING FEDERAL RESOURCES HOME TO THE DISTRICT
17 AND HOME TO LOUISIANA. AND THE ISSUES THAT NEW ORLEANS FACES
18 AND THE ISSUES THAT BATON ROUGE FACE ARE VERY DIFFERENT AND
19 REQUIRE THEIR OWN LEVELS OR THEIR OWN ADVOCATES IN CONGRESS TO
20 ADVANCE THOSE ISSUES.
21 AND SO LINKING PEOPLE ON HARDING BOULEVARD AND PEOPLE
22 ON BULLARD DOES NOT NECESSARILY MAKE SENSE TO ME BECAUSE THOSE
23 ARE DISTINCT COMMUNITIES LINKED BY RACE. BUT THERE ARE OTHER
24 FACTORS THAT I THINK NEED TO BE TAKEN INTO CONSIDERATION THAT
25 JUSTIFY HAVING A DIFFERENT REPRESENTATION IN THE BATON ROUGE

04:22 **Q.** AND IN YOUR LIVED EXPERIENCE, DO YOU BELIEVE THAT IT MAKES MORE SENSE TO LINK BATON ROUGE WITH NEW ORLEANS AND THE RIVER PARISHES THAN TO LINK BATON ROUGE WITH THE DELTA PARISHES?

A. NO. I THINK, AGAIN, RACE IS A FACTOR THAT WE TAKE INTO ACCOUNT, AND WE TAKE RACE INTO ACCOUNT WITH OTHER URBAN DYNAMICS. I DO NOT THINK IT MAKES SENSE TO LINK BATON ROUGE AND NEW ORLEANS, THE TWO, YOU KNOW, LARGEST POPULATION CENTERS OF THE STATE, THE TWO LARGEST BLACK COMMUNITIES OF THE STATE AND VERY DIFFERENT ECONOMIES AND VERY DIFFERENT, YOU KNOW, SETTINGS THAT REQUIRE REPRESENTATION.

I THINK BATON ROUGE IS NATURALLY CONNECTED TO THE DELTA REGION, AND I THINK THE HISTORY OF BLACK SETTLEMENT IN BATON ROUGE ALSO REFLECTS VERY REAL AND ENDURING CONNECTIONS TO THE DELTA REGION.

MS. SEDWICK: NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: CROSS.

MR. WALSH: GOOD AFTERNOON, YOUR HONOR.

JOHN WALSH ON BEHALF OF SECRETARY OF STATE ARDOIN.

THE COURT: MR. WALSH.

CROSS-EXAMINATION

BY MR. WALSH:

Q. GOOD AFTERNOON, MR TYSON.

A. GOOD AFTERNOON.

Q. IS IT MR. TYSON OR PROFESSOR TYSON?