Exhibit A

EXPERT REPORT OF MAXWELL PALMER, PH.D. IN SUPPORT OF PLAINTIFFS' REMEDIAL PLAN

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I previously submitted reports in this case on April 15, 2022, and May 2, 2022, and my first report sets forth my qualifications in detail. A copy of my most recent curriculum vitae is attached as Exhibit A.

2. I testified in this matter in the May 2022 preliminary injunction proceedings. I was accepted by the Court as an expert in redistricting and data analysis. The Court found me to be a credible expert witness and credited my testimony on racially polarized voting and performance in its June 6, 2022 opinion.

3. I was asked by the plaintiffs in this litigation to evaluate the performance of the Plaintiffs' Remedial Plan. Unless otherwise specified, all references to particular districts refer to this plan.

4. For the purpose of my analysis, I examined elections in the 2nd and 5th Congressional Districts under the Plaintiffs' Remedial Plan.

5. To analyze the performance of districts under the Plaintiffs' Remedial Plan, I relied on precinct-level election results from the 2012-2020 general elections. My original report in this matter describes this dataset.[1]

6. I analyzed performance by calculating the share of the vote that the Black-preferred candidate would have won under the boundaries of the Plaintiffs' Remedial Plan. Figure 1 and Table 1 present the results.

7. I find that Black-preferred candidates are almost always able to win elections in both the 2nd and 5th Congressional Districts. The Black-preferred candidate was successful in 17 of the 18 elections analyzed in the 2nd District, and 15 of the 18 elections analyzed in the 5th District.

8. Across 18 elections from 2012 to 2020, the average vote share for Black-preferred candidates is 64% in the 2nd District and 57% in the 5th District.

[1] I also analyzed the 2022 election for U.S. Senate, which was the only statewide contest in Louisiana in 2022. Using ecological inference, as described in my original report in this matter, I found that there was not a clear Black-preferred candidate in that election, because there were multiple candidates and the top candidate for Black voters, Gary Chambers, Jr., received only about half of the vote from Black voters. As a result, I do not include this contest in the performance analysis.

9. These results demonstrate that both the 2nd District and the 5th District of the Remedial Plan will provide Black voters an opportunity to elect their candidates of choice.

I reserve the right to continue to supplement my reports in light of additional facts, testimony and/or materials that may come to light.

I declare under penalty of perjury that the foregoing is true and correct.

Maxwell Pal

Executed on: September 15, 2023

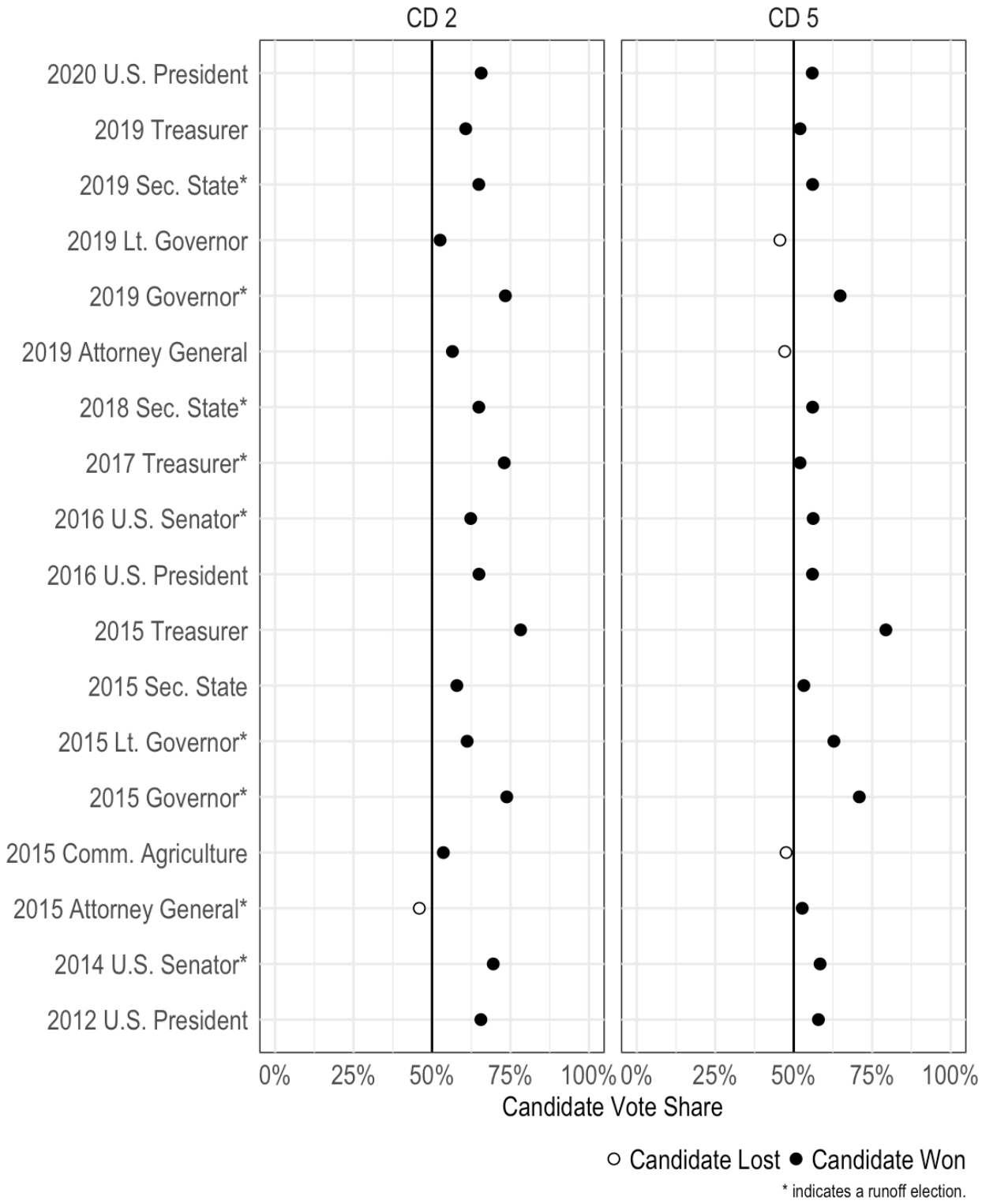

Figure 1: Vote Shares of Black-Preferred Candidates Under the Plaintiffs' Remedial Plan

Table 1: Vote Shares of Black-Preferred Candidates Under the Plaintiffs' Remedial Plan

Year	Office	Candidate	CD 2	CD 5
2012	U.S. President	Obama (D)	65.6%	57.9%
2014	U.S. Senator*	Landrieu (D)	69.5%	58.4%
2015	Comm. Agriculture	Greer (D)	53.6%	47.6%
2015	Sec. State	Tyson (D)	57.9%	53.2%
2015	Treasurer	Kennedy (R)	78.2%	79.4%
2015	Attorney General*	Caldwell (R)	46.0%	52.7%
2015	Governor*	Edwards (D)	73.8%	70.9%
2015	Lt. Governor*	Holden (D)	61.2%	62.8%
2016	U.S. President	Clinton (D)	65.0%	56.0%
2016	U.S. Senator*	Campbell (D)	62.3%	56.2%
2017	Treasurer*	Edwards (D)	73.0%	52.0%
2018	Sec. State*	Collins-Greenup (D)	64.9%	56.0%
2019	Attorney General	Jackson (D)	56.5%	47.1%
2019	Lt. Governor	Jones (D)	52.6%	45.6%
2019	Treasurer	Edwards (D)	60.7%	52.0%
2019	Governor*	Edwards (D)	73.4%	64.8%
2019	Sec. State*	Collins-Greenup (D)	64.9%	56.0%
2020	U.S. President	Biden (D)	65.7%	55.9%

* indicates a runoff election.