

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

PRESS ROBINSON, EDGAR CAGE,
DOROTHY NAIRNE, EDWIN RENE
SOULE, 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.

NANCY LANDRY, in her official capacity as
Secretary of State for Louisiana,

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

EDWARD GALMON, SR., CIARA HART,
NORRIS HENDERSON, TRAMELLE
HOWARD,

Plaintiffs,

v.

NANCY LANDRY, in her official capacity as
Secretary of State for Louisiana,

Defendant.

Civil Action No. 3:22-cv-00214-SDD-RLB

**UNOPPOSED MOTION TO WITHDRAW *GALMON* PLAINTIFFS' MOTION TO
RECONSIDER DISMISSAL RULING AND TO SCHEDULE REMEDIAL
PROCEEDINGS**

Edward Galmon, Sr., Ciara Hart, Norris Henderson, and Tramelles Howard (“*Galmon Plaintiffs*”) respectfully move to withdraw their Motion to Reconsider Dismissal Ruling and to Schedule Remedial Proceedings, ECF No. 372 (“Motion to Reconsider”).

This Court found in its Court’s April 25, 2024, ruling granting Defendants’ Motion to Dismiss, ECF No. 371 (“Ruling”), that Plaintiffs’ injury was rendered moot by the Legislature’s enactment of Senate Bill 8 (“S.B. 8”), a remedial congressional districting plan that cured Plaintiffs’ injury by creating the second Black-opportunity district that Section 2 requires. *See* Ruling at 8 (holding that, “with the state’s enactment of S.B. 8, there is currently no injury-in-fact”). Plaintiffs originally opposed Defendants’ motion to dismiss based on the *Callais* lawsuit in the Western District, where plaintiffs sought to enjoin S.B. 8 for the 2024 election. *Galmon Pls.’ Opp’n to Mot. to Dismiss* at 5, ECF No. 358 (“Plaintiffs fear that their voting rights will be denied in the 2024 elections, which remain several months away.”); *see also id.* at 8–9 (arguing that dismissal would “compound the irreparable harm that Plaintiffs already suffered in 2022 when they voted in districts drawn in violation of Section 2, which is precisely what the *Callais* plaintiffs have asked a sister court to order for 2024”). On May 1, *Galmon* Plaintiffs moved this Court to reconsider that dismissal because, on April 30, the Western District of Louisiana permanently enjoined S.B. 8, depriving Plaintiffs of their remedy and reanimating their injury. *See Inj. & Reasons for J., Callais v. Landry*, No. 3:24-cv-00122-DCJ-CES-RRS (W.D. La. Apr. 30, 2024), ECF No. 198 (“Inj.”).

On May 15, however, the Supreme Court stayed the Western District’s injunction pending appeal, *see* Opinion, *Robinson v. Callais*, No. 23A994 and *Landry v. Callais*, No. 23A1002, 601 U.S. ____ (2024), which guarantees that S.B. 8 will remain in place—at the very least—for the 2024 congressional election. In line with this Court’s Ruling, the implementation of S.B. 8 and the

guarantee that H.B. 1 will not be used in the 2024 congressional election remedies Plaintiffs' injury. Ruling at 8. Therefore, *Galmon* Plaintiffs move to withdraw their Motion to Reconsider.

This motion is unopposed. Counsel for *Galmon* Plaintiffs requested and obtained consent for the withdrawal of their Motion to Reconsider Dismissal Ruling and to Schedule Remedial Proceedings from all parties.

Date: May 24, 2024

Respectfully submitted,

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