

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

DR. DOROTHY NAIRNE, JARRETT  
LOFTON, REV. CLEE EARNEST LOWE,  
DR. ALICE WASHINGTON, STEVEN  
HARRIS, ALEXIS CALHOUN, BLACK  
VOTERS MATTER CAPACITY BUILDING  
INSTITUTE, and THE LOUISIANA STATE  
CONFERENCE OF THE NAACP,

*Plaintiffs,*

v.

R. KYLE ARDOIN, in his official capacity as  
Secretary of State of Louisiana,

*Defendant.*

CIVIL ACTION NO. 3:22-cv-00178  
SDD-SDJ

**CONSENT MOTION TO MODIFY THE SCHEDULING ORDER**

Plaintiffs hereby file this Consent Motion to Modify the Scheduling Order (Doc. 66).

The Scheduling Order currently sets certain deadlines for disclosure of Rebuttal Reports and the completion of expert discovery. The Parties request the Scheduling Order as to these deadlines be modified as follows:

2. Discovery must be completed as follows:

- a. Completing fact discovery and filing any fact discovery related motions: October 17, 2022.
- b. Completing expert discovery and filing any expert discovery related motions: October 21, 2022.
- d. Exchange of expert reports:

Defendants: September 9, 2022.

Plaintiffs Rebuttal: September 23, 2022.

Defendants and Intervenors (Sur-Rebuttal): October 7, 2022.

The Parties have conferred and agree that these few small modifications to these deadlines would be helpful to all Parties in complying with the Court's deadlines. The Parties, therefore, respectfully request that Court grant this Consent Motion.

The Parties do not seek any additional changes to the current Scheduling Order.

A Proposed Order is attached.

DATED: August 19, 2022

Respectfully submitted,

/s/ Sarah Brannon

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### **Attorneys for Plaintiff Louisiana State Conference of the NAACP**

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\*\*Bar admission forthcoming

**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 2022, a copy of Plaintiffs' Consent Motion to Modify the Scheduling Order was filed electronically with the Clerk of Court via the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Sarah Brannon  
Sarah Brannon

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**[PROPOSED] ORDER**

Upon consideration of Consent Motion to Modify the Scheduling Order, it is hereby  
ORDERED that the motion is GRANTED. IT IS ORDERED that:

Discovery must be completed as follows:

- a. Completing fact discovery and filing any fact discovery related motions:  
October 17, 2022.
- b. Completing expert discovery and filing any expert discovery related  
motions: October 21, 2022.
- c. Exchange of expert reports shall proceed as follows:

Defendants: September 9, 2022.

Plaintiffs Rebuttal: September 23, 2022.

Defendants and Intervenors (Sur-Rebuttal): October 7, 2022.

This \_\_\_\_\_ day of \_\_\_\_\_ 2022

\_\_\_\_\_  
United States Magistrate District Judge