

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

LOUISIANA STATE CONFERENCE  
OF THE NATIONAL ASSOCIATION  
FOR THE ADVANCEMENT OF  
COLORED PEOPLE, *et al.*,

*Plaintiffs,*

v.

STATE OF LOUISIANA *et al.*,

*Defendants.*

Case No. 3:19-cv-00479-JWD-SDJ

**CONSENT MOTION TO STAY AND ADMINISTRATIVELY CLOSE CASE**

NOW INTO COURT, through undersigned counsel, come the parties, jointly, who respectfully request the following:

1.

On May 4, 2022, the Court, at the request of the Parties, issued a stay of the elections of the Louisiana Supreme Court so that the Parties could attempt a negotiated settlement of these proceedings. ECF No. 101.

2.

On June 29, 2022, additional individuals, John L. Weimer, Greg Champagne, Craig Webre, and Greg Tregre (“Limited Purpose Intervenors”), sought intervention for the limited purpose of lifting the stay of the 2022 Louisiana Supreme Court election for District Six. ECF No. 110. The intervention was modified on July 5, 2022. ECF No. 114.

3.

After briefing, the Court on July 11, 2022 granted intervention on a limited basis to Limited Purpose Intervenors so that they may seek to lift the stay of the Supreme Court elections. ECF No.

129. The stay for the Supreme Court District Six election was subsequently lifted on July 13, 2022. ECF No. 135.

4.

As part of its order lifting the stay, the Court invited the parties to file a motion to stay these proceedings and administratively close the case so that the original parties may continue their negotiations towards a settlement of this matter. *Id.*

5.

Pursuant to this Court's Order of July 13, 2022, the parties therefore ask the Court to stay and administratively close the case so that the parties (excluding the Limited Purpose Intervenors) may pursue a settlement of Plaintiffs' claims.

6.

By staying this case, the Court will avoid the unnecessary expenditure of judicial resources and give the parties time to resolve outstanding legal questions and arrive at a negotiated settlement.

7.

The parties will continue to submit joint statements to the Magistrate Judge under seal every 45 days detailing the progress made towards the resolution of the case.

WHEREFORE, the parties ask that this case be stayed and administratively closed until the parties have arrived at a negotiated settlement of Plaintiffs' claims.

Dated: July 18, 2022

Respectfully submitted,

JEFF LANDRY  
ATTORNEY GENERAL

/s/ Angelique Duhon Freel

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**CERTIFICATE OF SERVICE**

I certify that on July 18, 2022, the foregoing was filed using the Court's CM/ECF system,  
which constitutes service on all counsel having appeared of record in this proceeding.

/s/ Jason Torchinsky  
Jason Torchinsky

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**[PROPOSED] ORDER GRANTING CONSENT MOTION TO STAY**

Considering the foregoing Consent Motion to Stay and Administratively Close Case filed by all parties in this matter,

**IT IS HEREBY ORDERED** that this case is stayed and administratively closed so that the parties may continue to pursue a settlement of Plaintiffs' claims.

**IT IS FURTHER ORDERED** that every 45 days, the parties will submit to the Magistrate Judge Under Seal a joint statement of the actions taken, and progress made in the resolution of the case.

**IT IS FURTHER ORDERED** that parties reserve the rights to petition the Court to pursue such other remedies available to them should the Plaintiffs and Defendants not be successful in their efforts to completely settle this matter.

Signed in Baton Rouge, Louisiana, on July \_\_, 2022.

**JUDGE JOHN W. deGRAVELLES  
UNITED STATES DISTRICT COURT**

**MIDDLE DISTRICT OF LOUISIANA**