

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, EDGAR CAGE,
DOROTHY NAIRNE, EDWIN RENÉ
SOULÉ, 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.

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

Defendant.

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

Plaintiffs,

v.

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

Defendant.

Case No. 3:22-cv-00211

Civil Action: 3:22-cv-00214

**Exhibit List of Defendant/Intervenor, the State of Louisiana ("State"), through Jeff
Landry, in his official capacity as Louisiana Attorney General**

PART I OF VII

2011 Redistricting Legislation

1. Act 2 (HB 6) of the First Extraordinary Session of 2011

2. DOJ Preclearance Letter Received August 1, 2011

2022 Redistricting Legislation

3. HB No. 1 Journal of the Senate
4. SB No. 5 House of Reps Journal and Minutes of Committee on House and Gov't Affairs
5. HB No. 1 Committee Minutes
6. HB No. 823 Official Daily Journal of the House of Reps

PART II OF VII

7. HB No. 1 Original and Engrossed

PART III OF VII

7. cont. HB 1 Reengrossed, Enrolled, Bill History and Pages 1 and 5 of February 1

PART IV OF VII

7. cont. HB 1 Page 1 of February 2; pages 1 and 2 of February 4; pages 1 and 2 of February 6; pages 1 and 3 of February 8; pages 1 and 2 of February 9; pages 1, 3, 4, 5, 6, 7, 8 and 9 of February 10; and pages 1, 11, 12 and 13 of February 18; Veto Ltr; and Minutes

PART V OF VII

8. HB No. 712 Official Daily Journal of the House of Reps
9. HB No. 608 Official Daily Journal of the House of Reps
10. SB No. 5 Committee Minutes
11. SB No. 5 Original, Engrossed and Enrolled versions
12. SB No. 5 Journal of the Senate
13. SB No. 5 Veto Message
14. SB No. 306 Journal of the Senate
15. SB 306 Original version

16. Enrolled HB 1 of the 2022 1st Extraordinary Session; the Official Daily Journal of the House of Representatives for 3/30/2022; Ltr of Declaration of House and Senate to declare a Veto Session

Secretary of State – Voter History

17. Davante Earl Damon Lewis

18. Ambrose Sims, Jr.

19. Press L. Robinson

20. Edgar Charles Cage

21. Edwin Rene Soule

22. Tranelle Donnelle Howard

23. Norris Henderson

24. Ciara Chante Hart

25. Alexis Jana Calhoun

26. Steven Rufus Harris, Sr.

27. Clee E. Lowe

28. Dorothy Evelyn Nairne

29. Jarrett Sheraud Lofton

Diversity Articles

30. LDH Bureau of Minority Health Access

<https://ldh.la.gov/subhome/15>

31. LDH Programs for African American Health – Accessibility

<https://ldh.la.gov/subhome/63>

32. BR Commission on Racial Equity

<https://www.brla.gov/2204/Commission-on-Racial-Equity-and-Inclusio>

33. Christian Science Monitor Article on LSU and Diversity

<https://www.csmonitor.com/EqualEd/2019/0405/For-state-schools-diversity-isn-t-just-about-fairness.-It-s-also-about-the-bottom-line>

34. Diversity and Inclusion Summit – LA Society for Human Resources Management

<https://louisianashrm.shrm.org/diversity>

35. Diversity Initiative for Business – Alexandria

<https://diversityinaction.org/>

36. Diversity Report at LSU

https://www.lsu.edu/diversity/about_us/affiliates.php

37. Division of Diversity – LDI

<https://www.ldi.la.gov/industry/resources-and-publications/diversity-opportunity>

38. HCR 19

39. Doug Williams Center of the LA Minority Hiring Task Force

https://dougwiliamscenter.com/news/unanimous_house_vote_2/

<https://dougwiliamscenter.com/news/why-diversity-matters-in-louisiana-college-sports-administration-and-how-the-state-is-addressing-it/>

40. LA Diversity Task Force - LSU to Promote Diversity Hiring

<https://www.lsu.edu/administration/info/diversity-task-force.php>

41. LA Economic Development on Diversity

<https://www.opportunitylouisiana.com/led-news/news-releases/news/2021/10/01/led-launches-diversity-in-entrepreneurship-initiative>

42. LA State Bar Association Diversity Statement

<https://www.lsba.org/diversity/DiversityHome.aspx>

43. LSBA Statement of Diversity Principles

<https://www.lsba.org/diversity/DiversityPrinciples.aspx>

44. LSU African American Diversity Organization LSU Programs

<https://www.lsu.edu/diversity/aacc/programs.php>

45. LSU Health Shreveport Diversity, Equity and Inclusion Statement

<https://www.lsuhs.edu/our-schools/diversity-equity-inclusion>

46. McNeese Diversity Office

<https://www.mcneese.edu/cdo/>

47. Office for Campus Diversity - ULL - Educating for Equity

<https://louisiana.edu/news-events/news/20210907/%E2%80%98educating->

[equity%E2%80%99-researchers-focus-diversity-strategies](https://louisiana.edu/news-events/news/20210907/%E2%80%98educating-equity%E2%80%99-researchers-focus-diversity-strategies)

48. Office for Campus Diversity – ULL

<https://diversity.louisiana.edu/>

49. Office of Equity, Diversity and Inclusion at LSU

<https://www.lsu.edu/diversity/>

50. State As a Model Employer (SAME) Task Force Report - 08.01.2018

https://gov.louisiana.gov/assets/Programs/GODA/SAME_Report.pdf

51. Statement on a ULI (Urban Land Institute) Diversity Commitment

<https://louisiana.uli.org/about/diversity-commitment/>

52. The Advocate - African American college enrollment

https://www.theadvocate.com/baton_rouge/news/education/article_f6e96cd4-0ada-11e8-b6d2-039dae039ff.html

53. The Advocate – Bill Tate

https://www.theadvocate.com/baton_rouge/news/education/article_33fc9926-ae74-11eb-9826-170aa6cb58a4.html

PART VI OF VII

Transcripts

54. Trial Transcript – Koonce v. Secretary of State

PART VII OF VII

Expert Reports

55. Report of Dr. John Alford

56. Report of Tom Bryan

57. Report of Mike Hefner

58. Report of Alan Murray

Additional Exhibits

59. JBE 2022 - Juneteenth Day Holiday

Other Miscellaneous Exhibits

1. Expert reports
2. Expert CV
3. Documents relied on by experts
4. Relevant non-privileged/non-confidential records kept by the Secretary of State related to elections
5. Voting records of the Plaintiffs
6. Voter information reports

7. Registered voter information
8. United States Census data
9. Legislative records
10. Relevant election returns
11. Voter registration and sign in data
12. Post-Election statistical reports
13. Precinct geography
14. Records and documents in the possession and control of the Registrar of voters
15. Press releases or new articles related to candidate elections
16. Preclearance documents
17. Any documents produced by the parties during discovery
18. Any document attached to any pleadings filed in this case
19. Any discovery responses from any party in the case
20. Any document considered by an expert in this case
21. Any document listed by any other party

The State of Louisiana reserves the right to supplement this list as discovery is ongoing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I CERTIFY I have served the foregoing was served on counsel for the parties via electronic means on April 29, 2022.

/s/ Jeffrey Wale
Jeffrey Wale