

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

PRESS ROBINSON et al.,

Plaintiffs,

v.

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

Defendant.

Case No. 3:22-cv-00211-SDD-SDJ c/w

EDWARD GALMON, SR. et al.,

Plaintiffs,

v.

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

Defendant.

Case No. 3:22-cv-00214-SDD-SDJ

***GALMON* PLAINTIFFS' EXHIBIT LIST FOR PRELIMINARY INJUNCTION
PROCEEDINGS**

Pursuant to the Court's scheduling order of April 19, 2022, *see* Rec. Doc. No. 63, Plaintiffs Edward Galmon, Sr., Ciara Hart, Norris Henderson, and Tramelle Howard (the "*Galmon* Plaintiffs") respectfully submit the following list of exhibits they expect to use in connection with the preliminary injunction hearing to commence on May 9, 2022.¹

¹ Because the deadline for exhibit lists precedes the deadline for the *Galmon* Plaintiffs' reply in support of their motion for preliminary injunction, they reserve the right to file an amended list to reflect any additional exhibits identified in or filed with their reply.

EXHIBITS²

Exhibit No.	Description	Docket Location
1	Expert report of William Cooper and accompanying exhibits and attachments, dated April 15, 2022	Rec. Doc. Nos. 43–46
2	Expert report of Dr. Maxwell Palmer and accompanying exhibits and attachments, dated April 15, 2022	Rec. Doc. No. 47
3	Expert report of Dr. Allan Lichtman and accompanying exhibits and attachments, dated April 15, 2022	Rec. Doc. No. 48
4	Declaration of Christopher J. Tyson, dated April 15, 2022	Rec. Doc. No. 49
5	Declaration of Charles Cravins, dated April 15, 2022	Rec. Doc. No. 50
6	Declaration of Edward Galmon, Sr., dated April 15, 2022	Rec. Doc. No. 50-1
7	Declaration of Ciara Hart, dated April 15, 2022	Rec. Doc. No. 50-2
8	Declaration of Norris Henderson, dated April 14, 2022	Rec. Doc. No. 50-3
9	Declaration of Tramelle Howard, dated April 15, 2022	Rec. Doc. No. 50-4
10	Piper Hutchinson, <i>‘When We Sue, We Win’: Black Baton Rouge Residents Call for Second Majority Black Congressional District</i> , Daily Reveille (Nov. 21, 2021), https://www.lsureveille.com/news/when-we-sue-we-win-black-baton-rouge-residents-call-for-second-majority-black-congressional/article_35da528c-4a3d-11ec-bff3-f341498a4f66.html	Rec. Doc. No. 51
11	Steven Procopio & Melinda Deslatte, <i>Legislature Sought Public Input in Redistricting, but Mostly Ignored It</i> , The Advocate (Feb. 23, 2022), https://www.theadvocate.com/baton_rouge/opinion/article_c42f8b5a-94d0-11ec-81ec-7732dee83c2c.html	Rec. Doc. No. 51
12	Blake Paterson, <i>Should Louisiana Draw a Second Majority-Black Congressional District? Here’s What Lawmakers Proposed</i> , Advocate (Feb. 21, 2022), https://www.theadvocate.com/baton_rouge/news/politics/legislature/article_2324563e-83a3-11ec-9ce2-b3e0b1ee1a99.html	Rec. Doc. No. 51

² The *Galmon* Plaintiffs reserve the right to use exhibits listed by any other party to this action, as well as by the parties in the consolidated *Robinson* matter.

Exhibit No.	Description	Docket Location
13	Wesley Muller, <i>Louisiana House Approves Congress Map With 1 Majority Black District</i> , La. Illuminator (Feb. 10, 2022), https://lailluminator.com/2022/02/10/louisiana-house-approves-congress-map	Rec. Doc. No. 51
14	Wesley Muller, <i>Louisiana Senate Approves Map for Congress Without New Minority District</i> , Louisiana Illuminator (Feb. 8, 2022), https://lailluminator.com/2022/02/08/louisiana-senate-approves-map-for-congress-without-new-minority-district	Rec. Doc. No. 51
15	Blake Paterson, <i>Louisiana Legislature Sends Congressional Map with One Majority-Black District to Governor's Desk</i> , Advocate (Feb. 18, 2022), https://www.theadvocate.com/baton_rouge/news/politics/legislature/article_dd507448-90e1-11ec-bc5d-1faf116428b4.html	Rec. Doc. No. 51
16	Blake Paterson, <i>Gov. John Bel Edwards Says 'Fair' Congressional Maps Would Include Another Majority-Black District</i> , Advocate (Dec. 16, 2021), https://www.theadvocate.com/baton_rouge/news/politics/legislature/article_64e99736-5ea6-11ec-bea4-2fa9f0b6f8c9.html	Rec. Doc. No. 52
17	<i>Gov. Edwards Vetoes Proposed Congressional District Map, Announces Other Action on Newly Drawn District Maps</i> , Office of Governor (Mar. 9, 2022), https://gov.louisiana.gov/index.cfm/newsroom/detail/3585	Rec. Doc. No. 52
18	<i>Letter from Governor John Bel Edwards to Speaker of the House Clay J. Schexnayder</i> , Office of Governor (Mar. 9, 2022), https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf	Rec. Doc. No. 52
19	Wesley Muller & Greg Larose, <i>Louisiana Legislature Overrides Gov. Edwards' Veto of Congressional Map</i> , La. Illuminator (March 30, 2022), https://lailluminator.com/2022/03/30/louisiana-legislature-overrides-gov-edwards-veto-of-congressional-map	Rec. Doc. No. 52
20	Joint Rule No. 21, La. State Legislature, https://www.legis.la.gov/Legis/Law.aspx?d=1238755 (last visited Apr. 11, 2022)	Rec. Doc. No. 52

Exhibit No.	Description	Docket Location
21	<i>Former Leader of Klan Narrowly Wins Contest in Louisiana</i> , N.Y. Times (Feb. 19, 1989), https://www.nytimes.com/1989/02/19/us/former-leader-of-klan-narrowly-wins-contest-in-louisiana.html	Rec. Doc. No. 52
22	Roberto Suro, <i>Duke Softens Past in Louisiana Race</i> , N.Y. Times (Sept. 2, 1991), https://www.nytimes.com/1991/09/24/us/duke-softens-past-in-louisiana-race.html	Rec. Doc. No. 52
23	Paul West, <i>The Numbers from Louisiana Add up Chillingly Duke's Claim on White Vote Shows Depth of Discontent</i> , Baltimore Sun (Nov. 17, 1991), https://www.baltimoresun.com/news/bs-xpm-1991-11-18-1991322072-story.html	Rec. Doc. No. 52
24	<i>2022 Elections</i> , La. Sec'y of State, https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf (last visited Apr. 11, 2022)	Rec. Doc. No. 52
25	<i>Session Information for the 2022 Regular Session</i> , La. State Legislature, https://legis.la.gov/legis/SessionInfo/SessionInfo_22RS.aspx (last visited April 11, 2022))	Rec. Doc. No. 52
26	Declinatory, Dilatory, & Peremptory Exceptions on Behalf of the Secretary of State to Plaintiffs' Petition for Injunctive & Declaratory Relief, <i>Bullman v. Ardoin</i> , No. C-716690 (La. 19th Jud. Dist. Ct. Mar. 16, 2022)	Rec. Doc. No. 53
27	Declinatory, Dilatory, & Peremptory Exceptions on Behalf of Clay Schexnayder, in His Official Capacity as Speaker of the Louisiana House of Representatives, and Patrick Page Cortez, in His Official Capacity as President of the Louisiana Senate, <i>Bullman v. Ardoin</i> , No. C-716690 (La. 19th Jud. Dist. Ct. Mar. 29, 2022)	Rec. Doc. No. 53
28	Motion for Stay to Be Taken up After Exception Hearing, If Exceptions Are Denied by the District Court, <i>Bullman v. Ardoin</i> , No. C-716690 (La. 19th Jud. Dist. Ct. Mar. 24, 2022)	Rec. Doc. No. 53
29	Transcript of Exception Hearing, <i>Bullman v. Ardoin</i> , No. C-716690 (La. 19th Jud. Dist. Ct. Apr. 11, 2022)	N/A
30	Jonathan Tilove, <i>David Vitter Ad Slammed as Racist by Advocates for Immigrants</i> , Times Picayune, https://www.nola.com/news/politics/article_7cb50f69-5e87-5ae9-98a3-2f14d67a6a9f.html (June 25, 2019)	N/A

Exhibit No.	Description	Docket Location
31	<i>Welcome Prize</i> , YouTube (Oct. 6, 2010), https://www.youtube.com/watch?v=9uvp0Jlh6U	N/A
32	<i>David Vitter 2015 Campaign Ad</i> , http://link.brightcove.com/services/player/bcpid1764219419001?bckey=AQ~~,AAAAAETmrZQ~,EVFEM4AKJdRI6UgfPhFgV0s-3wZ2v95n&bctid=4581843421001 (last visited Apr. 27, 2022)	N/A
33	<i>John Bel Edwards and Stacey Abrams: Too Liberal for Louisiana</i> , YouTube (Sept. 12, 2019), https://www.youtube.com/watch?v=so3LhNWs9R4&t=2s .	N/A
34	<i>“Scars and Bars” Gary Chambers</i> , YouTube (Feb. 9, 2022), https://www.youtube.com/watch?v=X6iSRU9486I	N/A

Dated: April 29, 2022

Respectfully submitted,

By s/Darrel J. Papillion
Darrel J. Papillion (Bar Roll No. 23243)
Renee C. Crasto (Bar Roll No. 31657)
Jennifer Wise Moroux (Bar Roll No. 31368)
**WALTERS, PAPIILLION,
THOMAS, CULLENS, LLC**
12345 Perkins Road, Building One
Baton Rouge, Louisiana 70810
Phone: (225) 236-3636
Fax: (225) 236-3650
Email: papillion@lawbr.net
Email: crasto@lawbr.net
Email: jmoroux@lawbr.net

Abha Khanna*
Jonathan P. Hawley*
ELIAS LAW GROUP LLP
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
Email: akhanna@elias.law
Email: jhawley@elias.law

Lalitha D. Madduri*
Olivia N. Sedwick*
Jacob D. Shelly*
ELIAS LAW GROUP LLP
10 G Street NE, Suite 600
Washington, D.C. 20002
Phone: (202) 968-4490
Facsimile: (202) 968-4498
Email: lmadduri@elias.law
Email: osedwick@elias.law
Email: jshelly@elias.law

Counsel for Plaintiffs

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of April, 2022, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent through the Court's electronic filing system to all counsel of record.

s/Darrel J. Papillion
Darrel J. Papillion