

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

LOUISIANA STATE CONFERENCE, OF
THE NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF COLORED
PEOPLE; ANTHONY ALLEN; AND
STEPHANIE ANTHONY

Plaintiffs,

v.

STATE OF LOUISIANA; and R. KYLE
ARDOIN, in his capacity as Secretary of
State of Louisiana,
Defendants.

Civil Action No. 3:19-cv-00479-JWD-EWD

JOINT MOTION FOR EXTENSION OF DEADLINES

NOW INTO COURT, through undersigned counsel, comes Nancy Landry, in her official capacity as Secretary of State of Louisiana (“Secretary of State Landry”), the State of Louisiana by and through Attorney General Liz Murrill (“the State”) (together “Defendants”), and the Louisiana State Conference of the NAACP, Anthony Allen, and Stephanie Anthony (together “Plaintiffs”) (collectively the “Parties”) who respectfully move this Honorable Court for an extension of deadlines for fact and expert discovery, as follows:

1. According to the Court’s Order dated August 28, 2023 (ECF 174) all fact discovery is to be completed by February 29, 2024. Additionally, expert witness lists, reports, and discovery must be completed by the following deadlines:

- Plaintiffs’ Expert Witness List and Reports: April 30, 2024
- Defendants’ Expert Witness List and Reports: June 28, 2024
- Discovery from Experts: October 15, 2024

2. As this Court is aware, Secretary of State Ardoin’s term recently expired, and Secretary Landry recently took office.

3. As this Court is similarly aware, Attorney General Jeff Landry's term of office also recently expired, and Attorney General Liz Murrill recently took office.

4. To enable Secretary Landry and Attorney General Murrill enough time to consider the proper course for this litigation since assuming their respective offices, a brief extension of these deadlines is warranted.

5. This request for an extension of time is the first such request with respect to discovery completion.

6. Granting this request for extension should not slow the progress of this matter inasmuch as all Parties will need to complete discovery and the remaining deadlines from the Court's scheduling order will not be impacted.

7. Therefore, for the reasons set forth in this motion and believing there exists good cause for an extension pursuant to Local Rule 7, Parties respectfully request that the deadline for fact discovery completion be extended an additional thirty-two (32) days,¹ and that all deadlines for expert witness lists, expert reports, and expert discovery also be extended an additional thirty days.

WHEREFORE, all Parties respectfully request that the deadline for the completion of fact discovery be extended an additional thirty-two (32) days from February 29, 2024 to April 1, 2024. Additionally, all Parties request that the deadlines for expert witness lists, reports, and discovery be extended an additional thirty (30) days to the following dates:

- Plaintiffs' Expert Witness List and Reports: May 30, 2024
- Defendants' Expert Witness List and Reports: July 28, 2024
- Rebuttal Expert Reports: August 31, 2024
- Sur-Rebuttal Expert Reports: September 30, 2024
- Discovery from Experts: November 15, 2024

¹ A thirty-day extension falls on the Saturday of Easter weekend, therefore the Parties are requesting an additional two days such that the deadline falls on a Monday.

Dated: January 23, 2024

Respectfully submitted:

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/s/Carey Tom Jones

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CERTIFICATE OF SERVICE

I do hereby certify that, on this 23rd day of January 2024, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Carey Tom Jones
Carey Tom Jones

*Counsel for Defendants Attorney General Jeff
Landry and the State of Louisiana*

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[PROPOSED] ORDER

Considering the foregoing *Joint Motion for Extension of Deadlines* by the Parties,

IT IS HEREBY ORDERED that the motion is **GRANTED** and that Defendants' deadline for completion of Fact Discovery is extended an additional thirty-two (32) days from February 29, 2024 to April 1, 2024.

IT IS FURTHER ORDERED that the Parties' deadlines for expert witness lists, reports, and discovery are extended an additional thirty (30) days to the following dates:

- Plaintiffs' Expert Witness List and Reports: May 30, 2024
- Defendants' Expert Witness List and Reports: July 28, 2024
- Rebuttal Expert Reports: August 31, 2024
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- Discovery from Experts: November 15, 2024

Baton Rouge, Louisiana, this ____ day of January, 2024.

The Honorable Judge John W. DeGravelles
U.S. District Judge