

**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

**SECOND JOINT MOTION
FOR EXTENSION OF DEADLINES**

NOW INTO COURT, through undersigned counsel, comes the Louisiana State Conference of the NAACP, Anthony Allen, and Stephanie Anthony (together “Plaintiffs”), and Nancy Landry, in her official capacity as Secretary of State of Louisiana (“Secretary of State Landry”), and the State of Louisiana by and through Attorney General Liz Murrill (“the State”) (together “Defendants”) (collectively the “Parties”), who respectfully move this Honorable Court to extend the deadline for fact discovery and extend the briefing schedule on the State’s Motion to Dismiss (ECF 193), as follows:

1. On January 17, 2024, the State filed a modified Motion to Dismiss the First Amended Complaint (ECF 193). The Court’s February 5, 2024 Order (ECF 200-1) provided Plaintiffs until March 7, 2024 to file an opposition brief and the State fourteen (14) days thereafter to file a reply.

2. The Court’s February 5, 2024 Order (ECF 200-1) also provided that all fact

discovery is to be completed by April 29, 2024.

3. The Parties are aware that the Louisiana Legislature considered, but did not adopt, a new Supreme Court map during two, separate Extraordinary Sessions ordered by the Governor.

4. As this Court is aware, the Parties have engaged actively in discussions to consider the maps proposed during the Extraordinary Sessions in efforts to negotiate a resolution of this case.

5. To provide the Parties continued opportunity to work toward a resolution, additional 30-day extensions of the Motion to Dismiss briefing schedule¹ and fact discovery deadline are warranted.

6. Granting these extension requests 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. This is the Parties' second request of its kind.

8. Therefore, for the reasons set forth in this motion and believing there exists good cause for extensions pursuant to Local Rule 7, the Parties respectfully request that the deadline for fact discovery completion be extended thirty (30) days, and that all deadlines for the Motion to Dismiss briefing be extended thirty-one (30) days.²

WHEREFORE, all Parties respectfully request that the deadline for the completion of fact discovery be extended thirty (30) days from April 29, 2024 to May 29, 2024. All Parties additionally request that the deadlines for briefing the State's Motion to Dismiss be extended thirty (30) days with Plaintiffs' opposition brief due on April 7, 2024 and the State's reply brief

¹ A thirty-day extension falls on a Sunday, therefore the Parties are requesting an additional day such that the deadline falls on a Monday.

² A thirty-day extension falls on a Sunday, therefore the Parties are requesting an additional day such that the deadline falls on a Monday.

due fourteen (14) days after the filing of the opposition.

Dated: March 11, 2024

Respectfully submitted:

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MURRILL**

/s/Carey Tom Jones

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CERTIFICATE OF SERVICE

I do hereby certify that, on this 11th day of March 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/ Meryl Macklin
Meryl Macklin

*Counsel for Plaintiffs Louisiana State Conference of
the National Association for the Advancement of
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Anthony*

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[PROPOSED] ORDER

Considering the foregoing *Second Joint Motion to Substitute 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 thirty (30) days from April 29, 2024 to May 29, 2024.

IT IS FURTHER ORDERED that the Parties' deadlines for briefing the State's Motion to Dismiss are extended thirty-one (31) days with Plaintiffs' opposition brief due on April 8, 2024 and the State's reply brief due fourteen (14) days after the filing of the opposition.

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

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

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