UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

DR. DOROTHY NAIRNE, *et al.,* *Plaintiffs,* v. R. KYLE ARDOIN, in his official capacity as Secretary of State of Louisiana, *Defendant.*	Civil Action No. 3:22-cv-00178-SDD-SDJ Chief Judge Shelly D. Dick Magistrate Judge Scott D. Johnson

JOINT NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF DEFENDANTS' JOINT MOTION TO STAY OR IN THE ALTERNATIVE TO POSTPONE THE EVIDENTIARY HEARING DATE

Intervenor-Defendants and Defendant Nancy Landry, in her official capacity as Secretary of State of Louisiana (collectively, "Defendants"), respectfully submit this Notice of Supplemental Authority to inform the Court of a significant recent development in *Louisiana v. Callais*, Nos. 24-109 and 24-110, currently pending before the U.S. Supreme Court.

On August 1, 2025, the Supreme Court issued an order directing the parties in *Callais* to submit supplemental briefing on the following constitutional question: "Whether the State's intentional creation of a second majority-minority congressional district violates the Fourteenth or Fifteenth Amendments to the U.S. Constitution." Order, *Louisiana v. Callais*, Nos. 24-109 & 24-110, 606 U.S. ___ (Aug. 1, 2025); (Attachment A).[1]

[1] Additionally, the Supreme Court's briefing order roots this question in an issue raised on pages 36-38 of the Brief for Appellees found here: 20250121131829124_24-109 24-110 Brief for

This order underscores the relevance and urgency of the issues raised in Defendants' pending Joint Motion to Stay or Postpone the Evidentiary Hearing (Rec. Doc. 335). As noted in that motion, the remedial proceedings in this case involve precisely the same constitutional tensions between Section 2 of the Voting Rights Act and the Equal Protection Clause that the Supreme Court is now actively reviewing in *Callais*. In fact, the Supreme Court's order specifically cites the pages of the appellees' brief expressly invoking the legal issues pending on appeal in this case.[2] The Supreme Court's decision to solicit further briefing on this specific constitutional question only reinforces Defendants' position that continuing remedial proceedings before that guidance is issued risks wasted effort and inconsistent legal standards.

The order supports granting a stay or, alternatively, a one-year postponement of the evidentiary hearing currently scheduled for August 25, 2025.

Respectfully submitted, this the 4th day of August, 2025.

By: /s/ *Jason B. Torchinsky*
Jason B. Torchinsky*

Elizabeth B. Murrill (LSBA No. 20685)
Louisiana Attorney General
Carey Tom Jones (LSBA No. 07474)
Amanda M. LaGroue (LSBA No. 35509)

Office of the Attorney General
Louisiana Department of Justice
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6000 phone
(225) 326-6098 fax
murrille@ag.louisiana.gov
jonescar@ag.louisiana.gov
LaGroueA@ag.louisiana.gov

Appellees.pdf. These pages specifically reference the post-trial briefing in this matter, removing any doubt as to the intertwined nature of the legal issues between the two matters.

[2] *Id.*

Jason B. Torchinsky (DC Bar No 976033)*
HOLTZMAN VOGEL BARAN
TORCHINSKY & JOSEFIAK, PLLC
2300 N Street, NW,
Suite 643A
Washington, DC 20037
Tel: 202-737-8808
jtorchinsky@holtzmanvogel.com

* *Admitted pro hac vice*

Counsel for Defendant State of Louisiana and Legislative Intervenors

By: /s/ Phillip J. Strach
Phillip J. Strach*
Lead Counsel
Alyssa M. Riggins*
Cassie A. Holt*
Jordan A. Koonts*
NELSON MULLINS RILEY & SCARBOROUGH LLP
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603
Ph: (919) 329-3800
phil.strach@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
cassie.holt@nelsonmullins.com
jordan.koonts@nelsonmullins.com

/s/ John C. Walsh
John C. Walsh, LA Bar Roll No. 24903
Brooke R. Ydarraga, LA Bar Roll No. 41000
SHOWS, CALL & WALSH, L.L.P.
628 St. Louis St. (70802)
P.O. Box 4425
Baton Rouge, LA 70821
Ph: (225) 346-1461
Fax: (225) 346-1467
john@scwllp.com
brooke@scwllp.com

* *Admitted pro hac vice*

Counsel for Defendant Nancy Landry, in her official capacity as Secretary of State of Louisiana

CERTIFICATE OF SERVICE

I certify that on August 4, 2025 this document was filed electronically on the Court's electronic case filing system. Notice of the filing will be served on all counsel of record through the Court's system. Copies of the filing are available on the Court's system.

/s/ *Jason B. Torchinsky*
Jason B. Torchinsky

(ORDER LIST: 606 U.S.)

FRIDAY, AUGUST 1, 2025

ORDER IN PENDING CASES

24-109) LOUISIANA V. CALLAIS, PHILLIP, ET AL.
)
24-110) ROBINSON, PRESS, ET AL. V. CALLAIS, PHILLIP, ET AL.

The parties are directed to file supplemental briefs addressing the following question raised on pages 36–38 of the Brief for Appellees: Whether the State's intentional creation of a second majority-minority congressional district violates the Fourteenth or Fifteenth Amendments to the U. S. Constitution. Supplemental briefs for appellants are due on or before Wednesday, August 27, 2025. Supplemental brief for appellees is due on or before Wednesday, September 17, 2025. Reply briefs are due on or before 2 p.m., Friday, October 3, 2025. The time to file *amicus curiae* briefs is as provided for by this Court's Rule 37.3. Word limits and cover colors for the briefs should correspond to the provisions of this Court's Rule 33.1(g) pertaining to briefs on the merits rather than to the provision pertaining to supplemental briefs.