

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,
BRUCE ODELL, ELIZABETH ERSOFF,
ALBERT CAISSIE, DANIEL WEIR,
JOYCE LACOUR, CANDY CARROLL
PEAVY, TANYA WHITNEY, MIKE
JOHNSON, GROVER JOSEPH REES,
ROLFE MCCOLLISTER,

Plaintiffs,

v.

NANCY LANDRY, in her official capacity
as Secretary of State for Louisiana,

Defendant.

Civil Action No. 3:24-cv-00122

Judge David C. Joseph
Circuit Judge Carl E. Stewart
Judge Robert R. Summerhays

ROBINSON AND GALMON INTERVENORS' JOINT MOTION FOR STAY

Intervenors Press Robinson, Edgar Cage, Dorothy Nairne, Edwin Rene Soule, Alice Washington, Clee Earnest Lowe, Davante Lewis, Martha Davis, Ambrose Sims, the National Association for the Advancement of Colored People Louisiana State Conference, and the Power Coalition for Equity and Justice (*Robinson* Intervenors), and Intervenors Edward Galmon Sr., Ciara Hart, Norris Henderson, Tramelle Howard, and Ross Williams (*Galmon* Intervenors (collectively, Intervenors) respectfully move the Court to stay its April 30, 2024 injunction, Dkt. No. 198, until after the conclusion of the 2026 elections to allow for an orderly remedial process in this case, and respond to the State's Briefing, Dkt. No. 271. While the Supreme Court has now affirmed this Court's finding that Louisiana violated the Fourteenth Amendment when it drew

Congressional District 6 and enacted Senate Bill 8 (“S.B. 8”), it left the scope and timing of the remedy to this Court’s discretion.

As explained in the accompanying memorandum of law, the State has not identified any feasible plan for implementing this Court’s injunction against the use of S.B. 8 without irreparable harm to Louisiana voters, candidates, and elections officials and without threatening the integrity of the democratic process. Under the compulsion of that injunction, the State has initiated a hasty and disordered process of attempting to halt an ongoing election already in progress, resulting in more than 200,000 Louisiana voters who have already cast ballots, with many more voters casting ballots each day. Staying the injunction is necessary to avoid irreparable harm to voters and ensure an orderly remedial process. The principle derived from *Purcell v. Gonzales*, 549 U.S. 1 (2006), and the public interest further call for full implementation of this Court’s relief after the 2026 election.

Consistent with this Court’s inherent authority, Intervenors simply seek a stay to allow for a deliberative remedial process focused on Congressional District 6 that serves the public interest and avoids the State compounding its constitutional violation through a rushed and haphazard process. Doing so will permit Louisiana to engage in a transparent and meaningful process to produce a constitutionally compliant congressional plan for the 2028 elections without disenfranchising more than 200,000 Louisiana voters who have already cast ballots in the ongoing primary or sowing further chaos in an election already underway, all of which serves the interest of all Louisianians.

DATED: May 11, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2026, a true copy of this document was filed via the Court's CM/ECG system and that a copy will be sent automatically to all counsel of record.

/s/ John Adcock
John Adcock

CERTIFICATE OF CONFERENCE

I hereby certify on May 11, 2026 that Intervenors have conferred with Plaintiffs and Defendants about this motion. Plaintiffs, Defendant Secretary of State, and Defendant-Intervenor State of Louisiana oppose the motion. Proposed-Intervenor Lauren Jewitt and the *Collins v. Landry* Plaintiffs do not oppose.

/s/ John Adcock
John Adcock