UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

PHILLIP CALLAIS, et al., Plaintiffs, v. NANCY LANDRY, IN HER OFFICIAL CAPACITY AS LOUISIANA SECRETARY OF STATE, et al., Defendants.	)	Case No. 3:24-cv-00122-DCJ-CES-RRS District Judge David C. Joseph Circuit Judge Carl E. Stewart District Judge Robert R. Summerhays Magistrate Judge Kayla D. McClusky

PLAINTIFFS' RESPONSE TO STATE'S MOTION TO RESET DEADLINES

Plaintiffs do not object to the State's Motion to Reset Deadlines, Doc. 302, given the Supreme Court's recent order in *Allen v. Milligan*, No. 25A1314, 608 U.S. ___ (2026), and Plaintiffs' understanding of the Secretary of State's Affidavit, which can be read to effectively set a June 3, 2026, map deadline for the 2026 election—as explained in Plaintiffs' Response to the Affidavit, Doc. 300. At this apparently late date, the parties must rely on the Secretary's untested assertions.

Plaintiffs do not, however, waive any argument regarding whether Act 2 fully remedies Plaintiffs' injuries and complies with *Louisiana v. Callais*, 608 U.S. ___ (2026). Realistically, a complete review of Act 2, including possible discovery and witnesses at trial, in advance of the 2028 election will require substantially more time than the State's suggested schedule. Nonetheless, Plaintiffs did not oppose the State's suggested schedule for briefing and argument because it serves as a helpful starting point and provides an opportunity to resolve claims brought by any intervenors that raise issues on election timing or procedure and not Act 2's constitutionality.

If the Court grants the State's Motion to Reset Deadlines, Plaintiffs will file their application for attorneys' fees incurred to date within three weeks of that order.

Dated this 4th day of June, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that, on this 4th day of June, 2026, 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/ Edward D. Greim
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Attorney for Plaintiffs