UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA

PHILLIP CALLAIS, LLOYD PRICE, BRUCE ODELL, ELIZABETH ERSOFF, ALBERT CAISSIE, DANIEL WEIR, JOYCE LACOUR, CANDY CARROLL PEAVY, TANYA WHITNEY, MIKE JOHNSON, GROVER JOSEPH REES, and ROLFE MCCOLLISTER, *Plaintiffs*, v. NANCY LANDRY, in her official capacity as Secretary of State for Louisiana, *Defendant*.	Civil Action No. 3:24-cv-00122 Circuit Judge Carl E. Stewart Judge David C. Joseph Judge Robert R. Summerhays

ROBINSON AND _GALMON_ INTERVENORS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT

The *Robinson* and *Galmon* Intervenor-Defendants (together "Intervenor-Defendants") respectfully move, pursuant to Federal Rule of Civil Procedure 12(b)(1) to dismiss Plaintiffs' complaint, Dkt. No. 1, as moot. This Court lacks jurisdiction over Plaintiffs' claim as no live case or controversy remains, for two reasons:

First, a superseding law, Act 2 of 2026, has repealed and rendered ineffective S.B. 8, the law Plaintiffs challenged, and has remedied the only violation ever adjudicated in this case. Plaintiffs litigated, and this Court and the Supreme Court

adjudicated, a single claim: that District 6 of S.B. 8 was an unconstitutional racial gerrymander. The Legislature has since repealed S.B. 8 and enacted Act 2 in its place, and Plaintiffs concede that Act 2 remedies the racial gerrymander in District 6. Plaintiffs have thus obtained the complete relief they sought on the only claim adjudicated, and the map they challenged no longer exists.

Second, no other live controversy remains, and this Court's remedial authority does not extend to the matters Plaintiffs now seek to raise. This Court never adjudicated Plaintiffs' intentional discrimination claim as to any district and never found District 2 to be a racial gerrymander. A federal court's remedial authority in a redistricting case is limited to curing the violation actually adjudicated, namely, Plaintiffs' racial gerrymandering claim regarding District 6. It does not reach an unproven claim concerning District 2. Accordingly, this Court lacks jurisdiction to adjudicate Plaintiffs' objection to Act 2's District 2.

For the reasons set forth more fully in the accompanying memorandum of law, Intervenor-Defendants respectfully request that the Court dismiss this action as moot.

DATED: June 16, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which provides electronic notice of filing to all counsel of record, on this sixteenth day of June, 2026.

/s/ *John Adcock*

John Adcock