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

PARTIES' JOINT PROPOSAL REGARDING REMEDIAL PHASE DEADLINES

This Court ordered the parties to meet and confer on a joint proposed scheduling order for the remedial proceedings within 7 days of its June 17, 2026, status conference. See Dkt. No. 316. The Court advised the parties to consider Docket No. 63, the Court's scheduling order for the liability phase of trial. Following the Court's order, the parties met and conferred by email and by phone conference. The Plaintiffs, the State, the Robinson and Galmon Intervenors, and Intervenor Jewett jointly make this proposal. The Defendant Secretary of State takes no position. No other intervenor participated in party communications. In joining this proposal, the Galmon and Robinson Intervenors expressly preserve their position, raised by a motion to dismiss that is currently being briefed (Dkt. No. 313 and 313-1), that the Court lacks subject matter jurisdiction to conduct a remedial proceeding. Additionally, the State intends to object to any fact discovery that probes beyond the legislative history of SB121, and by agreeing to fact discovery deadlines does not waive that position. With those understandings, the parties propose the following schedule and have authorized undersigned counsel to make this filing.

Tues., December 15, 2026	Any party objecting to SB 121 must file a brief setting forth the legal basis for its objection. This filing shall include any expert reports supporting its position, as well as any alternative maps required by applicable law.
Weds., January 20, 2027	Any party opposing or responding to the December 15 filings must file a brief setting forth its legal position. This filing must include any expert reports supporting the party's position. Any reports supporting this brief or responding to the reports served on December 15, 2026, must also be served.
Fri., January 22, 2027	Deadline for serving fact discovery, including written discovery and notices of deposition.
Weds., January 27, 2027	Deadline for serving rebuttal expert reports to any reports submitted Jan. 20.
Fri., Feb. 12, 2027	Discovery must be completed.
Fri., Feb. 19, 2027	Parties must exchange witness and exhibit lists and provide them to the Court; parties must exchange deposition designations.
Tues., Feb. 23, 2027	**Trial depositions**. Depositions authorized by the Court for use at trial, if any (see Dkt. No. 63), shall be edited to remove nonessential, repetitious, and unnecessary material, as well as objections and colloquy of counsel. A copy of edited trial deposition transcripts shall be included in the bench books. All objections thereto must be filed and briefed by this deadline. Objections to deposition testimony will be waived unless submitted along with the deposition transcripts.
Tues., Feb. 23, 2027	**Bench Books.** The parties shall deliver one bench book to each of the judge's chambers for use by the judges at trial. The bench books should be tabbed and indexed with a cover sheet on which each party is to state all objections to the admissibility of exhibits. A fourth copy of the bench book shall be placed at the witness stand on the morning of the trial for use by testifying witnesses. In addition, the parties will provide a digital copy of the bench book to the judges' law clerks. The original exhibits must be entered into evidence at trial. After trial, the exhibits actually admitted into evidence must also be submitted on a flash drive or DVD.
Tues., Feb. 23, 2027	Pre-trial briefs are due.
March 2-3, 2027	Hearing

March 2027	Order

Dated this 24th day of June, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that, on this 24th 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
Edward D. Greim
Attorney for Plaintiffs