

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

**DAVID B. MEANS, ET AL.**

**CIVIL ACTION NO. 5:23-cv-00669**

**VERSUS**

**JUDGE JERRY EDWARDS, JR.**

**DESOTO PARISH, ET AL.**

**MAGISTRATE JUDGE HORNSBY**

**PLAINTIFFS' MOTION TO EXPEDITE  
CONSIDERATION OF THEIR MOTION TO STAY**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, who respectfully move this Honorable Court to expedite consideration of Plaintiffs' Motion to Stay by Friday, September 19, 2025, as there are impending deadlines. Specifically, dispositive and Daubert motions are due on September 23, 2025, the Pre-Trial Conference is set for January 21, 2026, and the Bench Trial is scheduled for February 9, 2026. ECF No. 87.

After mutual agreement to extend the discovery deadline to accommodate deposition scheduling, discovery concluded last week. Plaintiffs extended a good faith offer to enter into settlement negotiations, which Defendants declined. Plaintiffs waited until discovery had closed and the good faith offer to enter into settlement negotiations had been extended and rejected before filing the Motion to Stay in order. This was to avoid burdening the Court with premature requests and to give the parties a final opportunity to resolve the matter without judicial intervention. Only once those efforts concluded, and with impending deadlines now approaching, was it appropriate to seek relief from this Court.

As Plaintiffs have explained in their Motion to Stay, the *Louisiana v. Callais* decision will likely materially alter the legal framework governing this litigation. A short stay will therefore prevent unnecessary additional litigation once that decision is issued.

WHEREFORE, for these reasons, Plaintiffs respectfully request that this Court consider this Motion on an expedited basis no later than September 19, 2025.

Dated: September 15, 2025

RESPECTFULLY SUBMITTED:

/s/ Dallin B. Holt

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**CERTIFICATION OF SERVICE**

I hereby certify that on this day I electronically served the foregoing document upon all counsel of record.

DATED this 15<sup>th</sup> day of September 2025.

Respectfully submitted,

/s/ Dallin B. Holt  
Dallin B. Holt

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**[PROPOSED] ORDER**

Considering the Plaintiffs’ Motion to Expedite Consideration of their Motion to Stay (“Motion”) filed by Plaintiffs, David B. Means, Ryan Dupree, Robert G. Burford, Robert Gross, Mary L. Salley, Martha Trisler, John F. Pearce, Joe Cobb, Jack L. Buford, Jack E. Barron, W. Bruce Garlington, Donald Barber, Billy Dwayne Brumley, and Sherry Brumley (collectively “Plaintiffs”);

IT IS ORDERED that Plaintiffs’ Motion is GRANTED.

THUS DONE AND SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2025, in Shreveport, Louisiana.

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JUDGE JERRY EDWARDS, JR.  
WESTERN DISTRICT OF LOUISIANA