

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.	§	MAG. JUDGE MARK L. HORNSBY

RESPONSE TO PLAINTIFFS’ MOTION TO STAY

NOW INTO COURT, come Defendants, DeSoto Parish and the DeSoto Parish Police Jury (collectively, “**DeSoto**” or “**Defendants**”), who herein file this brief response to Plaintiffs’ Motion to Stay (Doc. 106), the memorandum in support of that motion (Doc 106-1), and the accompanying Motion to Expedite Consideration of Plaintiffs’ Motion to Stay (Doc. 107).

Defendants do not oppose the Motion to Stay, subject to two important caveats below.

First, the Plaintiffs’ requested stay is until the United States Supreme Court renders its decision in the case of *State of Louisiana v. Phillip Callais, et al*, Nos. 24-109 and 24-110. It is anticipated that the United States Supreme Court will render a decision in early 2026, given the number of briefs that have already been filed to date, the clear question the Court has asked of the litigants, and the fact that the *Callais* case addresses Federal elections set for 2026. However, if for some reason the United States Supreme Court takes a longer period of time to make its decision, Defendants respectfully reserve the right to file a motion to lift the stay in order that the matter before this Court can be tried in sufficient time to allow the 2027 State elections to be held as presently scheduled.

Second, Plaintiffs, in the memorandum in support of their Motion to Stay, suggest that the decision by the United States Supreme Court in *Callais* will impact the present case before this Court. While the *Callais* case may be informative, it will not be dispositive of the issues in this

case. The Defendants developed a plan based on the 2020 census relating to the districts of the DeSoto Parish Police Jury grounded in multiple considerations well beyond Title 2 of the Voting Rights Act, such as compactness, contiguity, respect for political subdivisions or communities defined by actual shared interests, incumbency protection, and political affiliation. Indeed, the plan as it exists now, like the 2010 and 2000 plans,¹ had six (6) majority white districts and five (5) minority black districts. This is not an example of race being a material factor, let alone a predominant one, but simple common sense based upon demographic principles.

Accordingly, Defendants believe a stay pending the United States Supreme Court decision described above is appropriate, but this is not an acquiescence that the Supreme Court decision may impact, from a substantive standpoint, the issues before this Court.

RESPECTFULLY SUBMITTED,

BREAZEALE, SACHSE & WILSON, L.L.P.

301 Main Street, Floor 23 (70801)

Post Office Box 3197

Baton Rouge, Louisiana 70821-3197

Telephone: (225) 387-4000

Telecopier: (225) 381-8029

/s/ Carroll Devillier, Jr.

Timothy W. Hardy (La. Bar #6550)

tim.hardy@bswllp.com

Claude F. Reynaud, Jr. (La. Bar #11197)

claudereynaud@bswllp.com

Jeanne C. Comeaux (La. Bar # 22999)

jeanne.comeaux@bswllp.com

Carroll Devillier, Jr. (La. Bar #30477)

carroll.devillier@bswllp.com

and

¹ Prepared by Cedric Floyd.

Peter J. Butler (La. Bar Roll # 18522)
peter.butler.jr@bswllp.com
Thomas M. Benjamin (La. Bar Roll #18562)
thomas.benjamin@bswllp.com
BREAZEALE, SACHSE & WILSON, L.L.P.
909 Poydras Street, Suite 1500
New Orleans, Louisiana 70112
Telephone: (504) 584-5454
Telecopier: (504) 584-5452

*Attorneys for DeSoto Parish and DeSoto Parish
Police Jury*

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.	§	MAG. JUDGE MARK L. HORNSBY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 17, 2025, a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/ Carroll Devillier, Jr.

Carroll Devillier, Jr. (La. Bar #30477)
BREAZEALE, SACHSE & WILSON, L.L.P.
301 Main Street, Floor 23 (70801)
Post Office Box 3197
Baton Rouge, Louisiana 70821-3197
Telephone: (225) 387-4000
Telecopier: (225) 381-8029
Email: carroll.devillier@bswllp.com