

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

EDWARD GALMON, SR., CIARA HART,
NORRIS HENDERSON, and TRAMELLE
HOWARD,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity as
Louisiana Secretary of State,

Defendant.

Case No. 3:22-cv-00214-BAJ-RLB

MOTION FOR STATUS CONFERENCE

Plaintiffs Edward Galmon, Sr., Ciara Hart, Norris Henderson, and Tramelle Howard, by and through undersigned counsel, respectfully move this Court to set a status conference in this matter on an expedited basis.

Plaintiffs brought this action to challenge Louisiana’s new congressional districting plan, House Bill 1 (“HB 1”), on the ground that it violates Section 2 of the Voting Rights Act of 1965, 52 U.S.C. § 10301. *See* Rec. Doc. 1. Plaintiffs seek an order (1) declaring that HB 1 violates Section 2 of the Voting Rights Act; (2) enjoining Defendant Louisiana Secretary of State R. Kyle Ardoin (the “Secretary”) from conducting future elections—including the 2022 midterm elections—under HB 1; and (3) ordering adoption of a valid congressional districting plan that gives Black voters the opportunity to elect their candidates of choice in two districts.

The qualifying period for Louisiana’s congressional candidates is set to commence on July 20, with early voting beginning at the end of October.¹ Given the need to timely adjudicate Plaintiffs’ claims well enough in advance of the upcoming election to accommodate the implementation of a remedial map, Plaintiffs respectfully request that this Court set an immediate status conference.

Plaintiffs further propose that the Court adopt the following briefing and hearing schedule for the motion to intervene filed by the presiding officers of the Louisiana Legislature, *see* Rec. Doc. 5, and Plaintiffs’ forthcoming motion for preliminary injunction:

Deadline for responses to motion of the presiding officers of the Louisiana Legislature to intervene	April 13, 2022
Deadline for Plaintiffs’ motion for preliminary injunction	April 15, 2022
Deadline for opposition(s) to Plaintiffs’ motion for preliminary injunction	April 22, 2022
Deadline for reply in support of Plaintiffs’ motion for preliminary injunction ²	April 27, 2022
Hearing on Plaintiffs’ motion for preliminary injunction	Week of May 2 or May 9, 2022

¹ The dates of the candidate-qualifying period and other election deadlines can be found on the Secretary’s website. *See 2022 Elections*, La. Sec’y of State, <https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf> (last visited Apr. 8, 2022).

² Pursuant to Local Rule 7(f), Plaintiffs will seek leave of the Court to file a reply memorandum in support of their motion for preliminary injunction.

Dated: April 8, 2022

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Respectfully submitted,

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Counsel for Plaintiffs

**Pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been filed electronically with the Clerk of Court using the CM/ECF filing system. Notice of this filing will be sent: (1) to counsel of record for the Proposed Legislative Intervenors via operation of the Court's electronic filing system; and (2) to counsel for the Defendant via electronic mail to Jennifer Bollinger, in-house counsel for the Louisiana Secretary of State; and Angelique Duhon Freel, Carey T. Jones, and Jeffrey Wale, attorneys for the Louisiana Attorney General.

Baton Rouge, Louisiana, this 8th day of April, 2022.

s/ *Darrel J. Papillion*
Darrel J. Papillion

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[PROPOSED] ORDER SETTING STATUS CONFERENCE

IT IS HEREBY ORDERED that a Status Conference is set on _____ day of
_____, 2022, at _____ .m.

Baton Rouge, Louisiana, this _____ day of _____, 2022

**HONORABLE BRIAN A. JACKSON
UNITED STATES DISTRICT JUDGE**