

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

LOUISIANA STATE CONFERENCE
OF THE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF
COLORED PEOPLE, *et. al.*,

Plaintiffs,

v.

Case No. 3:19-cv-00479-JWD-SDJ

STATE OF LOUISIANA, *et al.*,

Defendants.

**MOTION TO SUBSTITUTE EXHIBIT 4 TO AMENDED
MOTION TO INTERVENE AND FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION TO MAINTAIN THE STATUS QUO**

John L. Weimer, Greg Champagne, Mike Tregre, and Craig Webre (collectively “Intervenors”), through undersigned counsel, respectfully move the Court to substitute the attached Affidavit of Greg Champagne In Support of Amended Motion to Intervene and for Temporary Restraining Order and Preliminary Injunction to Maintain the Status Quo, as Exhibit 4 to that previously-filed motion. *See* Rec. Doc. 114-10. The attached affidavit includes the Parish of signing and Parish of residence (¶ 1) as St. Charles Parish and is identical to the previously-filed Exhibit 4 in all other respects. Accordingly, Intervenors seek to substitute this affidavit in support of their pending Amended Motion to Intervene and for Temporary Restraining Order and Preliminary Injunction to Maintain the Status Quo.

Dated: July 6, 2022.

Respectfully submitted,

/s/ John P. D'Avello

Richard C. Stanley, La. Bar No. 8487

Eva J. Dossier, La. Bar No. 35753

John P. D'Avello, La. Bar No. 39082

**STANLEY, REUTER, ROSS, THORNTON
& ALFORD, L.L.C.**

909 Poydras Street, Suite 2500

New Orleans, LA 70112

Telephone: 504-523-1580

Facsimile: 504-524-0069

rsc@stanleyreuter.com

ejd@stanleyreuter.com

jpd@stanleyreuter.com

John W. Perry, Jr., La. Bar No. 10524

PERRY, BALHOFF, MENGIS & BURNS, L.L.C.

2141 Quail Run Drive

Baton Rouge, Louisiana 70808

Telephone: 225-767-7730

Facsimile: 225-767-7967

perry@pbmbllc.com

Harold M. Block, La. Bar No. 03150

BLOCK & BOUTERIE

408 West Third Street

Thibodaux, Louisiana 70301

Telephone: 985-447-6767

Facsimile: 985-446-7357

hmb@blockandbouterie.com

Daniel A. Cavell, La. Bar No. 04074

MORVANT & CAVELL, L.L.C.

402 W. 4th Street

Thibodaux, LA 70301

Telephone: 985-449-7500

Facsimile: 985-449-7520

dcavell@bellsouth.net

Danna E. Schwab, La. Bar No. 20367

THE SCHWAB LAW FIRM

7847 Main Street

Houma, LA 70360-4455

Telephone: 985-868-1342

Facsimile: 985-868-1345

dschwab@theschwablawfirm.com

Christopher H. Riviere, La. Bar No. 11297

CHRISTOPHER H. RIVIERE, P.L.C.

103 West 3rd Street

Thibodaux, LA 70301

Telephone: 985-447-7440

Facsimile: 985-447-3233

criviere@rivierelaw.com

William A. Stark, La. Bar No. 12406

THE STARK LAW FIRM

275 Gabasse Street

Houma, LA 70360

Telephone: 985-223-3213

Facsimile: 985-868-8584

billy@williamstark.com

Carl A. Butler, La. Bar No. 17261

BUTLER LAW FIRM, L.L.C.

2400 Veterans Blvd., Suite 485

Kenner, LA 70062

Telephone: 504-305-4117

Facsimile: 504-305-4118

cbutler@butlerlawllc.com

Attorneys for John L. Weimer, Greg Champagne, Mike Tregre, and Craig Webre, in their individual capacities as voters from Louisiana Supreme Court District Six, and John L. Weimer, in his capacity as a candidate for Louisiana Supreme Court Justice from District Six

CERTIFICATE OF SERVICE

I certify that on July 6, 2022, the foregoing was filed using the Court's ECF System, which constitutes services on all counsel having appeared of record in this proceeding.

/s/ John P. D'Avello
John P. D'Avello

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

LOUISIANA STATE CONFERENCE
OF THE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF
COLORED PEOPLE, *et. al.*,

Plaintiffs,

v.

Case No. 3:19-cv-00479-JWD-SDJ

STATE OF LOUISIANA, *et al.*,

Defendants.

**MEMORANDUM IN SUPPORT OF
MOTION TO SUBSTITUTE EXHIBIT 4 TO AMENDED
MOTION TO INTERVENE AND FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION TO MAINTAIN THE STATUS QUO**

John L. Weimer, Greg Champagne, Mike Tregre, and Craig Webre (collectively “Intervenors”), through undersigned counsel, respectfully request that the Court substitute the attached Affidavit of Greg Champagne In Support of Amended Motion to Intervene and for Temporary Restraining Order and Preliminary Injunction to Maintain the Status Quo, as Exhibit 4 to that previously-filed motion. *See* Rec. Doc. 114-10. The proposed affidavit includes the Parish of signing and Parish of residence (¶ 1) as St. Charles Parish and is identical to the previously-filed affidavit in all other respects. The Intervenors submit this updated affidavit to avoid any confusion or delay in considering the substance of the pending motion. Accordingly, Intervenors seek to substitute this affidavit as Exhibit 4 to the motion.

Dated: July 6, 2022.

Respectfully submitted,

/s/ John P. D'Avello

Richard C. Stanley, La. Bar No. 8487

Eva J. Dossier, La. Bar No. 35753

John P. D'Avello, La. Bar No. 39082

**STANLEY, REUTER, ROSS, THORNTON
& ALFORD, L.L.C.**

909 Poydras Street, Suite 2500

New Orleans, LA 70112

Telephone: 504-523-1580

Facsimile: 504-524-0069

rsc@stanleyreuter.com

ejd@stanleyreuter.com

jpd@stanleyreuter.com

John W. Perry, Jr., La. Bar No. 10524

PERRY, BALHOFF, MENGIS & BURNS, L.L.C.

2141 Quail Run Drive

Baton Rouge, Louisiana 70808

Telephone: 225-767-7730

Facsimile: 225-767-7967

perry@pbmbllc.com

Harold M. Block, La. Bar No. 03150

BLOCK & BOUTERIE

408 West Third Street

Thibodaux, Louisiana 70301

Telephone: 985-447-6767

Facsimile: 985-446-7357

hmb@blockandbouterie.com

Daniel A. Cavell, La. Bar No. 04074

MORVANT & CAVELL, L.L.C.

402 W. 4th Street

Thibodaux, LA 70301

Telephone: 985-449-7500

Facsimile: 985-449-7520

dcavell@bellsouth.net

Danna E. Schwab, La. Bar No. 20367
THE SCHWAB LAW FIRM
7847 Main Street
Houma, LA 70360-4455
Telephone: 985-868-1342
Facsimile: 985-868-1345
dschwab@theschwablawfirm.com

Christopher H. Riviere, La. Bar No. 11297
CHRISTOPHER H. RIVIERE, P.L.C.
103 West 3rd Street
Thibodaux, LA 70301
Telephone: 985-447-7440
Facsimile: 985-447-3233
criviere@rivierelaw.com

William A. Stark, La. Bar No. 12406
THE STARK LAW FIRM
275 Gabasse Street
Houma, LA 70360
Telephone: 985-223-3213
Facsimile: 985-868-8584
billy@williamstark.com

Carl A. Butler, La. Bar No. 17261
BUTLER LAW FIRM, L.L.C.
2400 Veterans Blvd., Suite 485
Kenner, LA 70062
Telephone: 504-305-4117
Facsimile: 504-305-4118
cbutler@butlerlawllc.com

*Attorneys for John L. Weimer, Greg Champagne,
Mike Tregre, and Craig Webre, in their individual
capacities as voters from Louisiana Supreme Court
District Six, and John L. Weimer, in his capacity as
a candidate for Louisiana Supreme Court Justice
from District Six*

CERTIFICATE OF SERVICE

I certify that on July 6, 2022, the foregoing was filed using the Court's ECF System, which constitutes services on all counsel having appeared of record in this proceeding.

/s/ John P. D'Avello
John P. D'Avello

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

LOUISIANA STATE CONFERENCE
OF THE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF
COLORED PEOPLE, *et. al.*,

Plaintiffs,

v.

Case No. 3:19-cv-00479-JWD-SDJ

STATE OF LOUISIANA, *et al.*,

Defendants.

**AFFIDAVIT OF GREG CHAMPAGNE IN SUPPORT OF AMENDED
MOTION TO INTERVENE AND FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION TO MAINTAIN THE STATUS QUO**

**STATE OF LOUISIANA
PARISH OF ST. CHARLES**

BEFORE ME, the undersigned authority, personally came and appeared:

Intervenor Greg Champagne, in his individual capacity as a District Six voter who, after being duly sworn, did depose:

1. I am a person of the full age of majority and a resident of the Parish of St. Charles.
2. I make this Affidavit based upon my own personal knowledge and belief.
3. I am a registered voter in Louisiana Supreme Court District Six ("District Six").
4. Upon information and belief, the next election for the Supreme Court Justice for District Six has been set for November 8, 2022.
5. Upon information and belief, the time to qualify as a candidate for District Six seat has been set to occur between July 20 and July 22, 2022.

6. I was not contacted regarding the filing of the Consent Motion to Stay all Louisiana Supreme Court Elections (Rec. Doc. 100) in the present case and had no prior knowledge of it.

7. The parties submitted their Consent Motion to Stay all Louisiana Supreme Court elections (Rec. Doc. 100) to the Court on May 2, 2022.

8. The Court thereafter entered an Order staying all Louisiana Supreme Court elections until the state's Supreme Court voting districts have been reapportioned. Rec. Doc. 101.

9. I was not contacted by any of the parties in connection with any of the filings regarding the Consent Stay Order staying elections.

10. I do not consent to the stay of all Louisiana Supreme Court elections.

11. Absent the stay entered in this matter, I would vote as I am entitled to do in the November 8, 2022 District Six election.

12. The stay in the present matter, if not enjoined or partially lifted, will irreparably harm my right to vote by disenfranchising me from the upcoming November 8, 2022 election for District Six.


GREG CHAMPAGNE

Sworn to and subscribed before me,
Notary Public, this 10th day of July 2022.



La. Bar No. 31719

La. Notary No. 87759

Rochelle Champagne Fahrig
Printed Name

My commission expires at death.

Rochelle Champagne Fahrig
Notary Public (ID# 87759)
Louisiana Bar No. 31719
State of Louisiana
Parish of St. Charles
Commissioned for Life

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

LOUISIANA STATE CONFERENCE
OF THE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF
COLORED PEOPLE, *et. al.*,

Plaintiffs,

v.

Case No. 3:19-cv-00479-JWD-SDJ

STATE OF LOUISIANA, *et al.*,

Defendants.

**[PROPOSED] ORDER GRANTING
MOTION TO SUBSTITUTE EXHIBIT 4 TO AMENDED
MOTION TO INTERVENE AND FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION TO MAINTAIN THE STATUS QUO**

IT IS ORDERED that the Motion to Substitute Exhibit 4 to Amended Motion to Intervene and for Temporary Restraining Order and Preliminary Injunction to Maintain the Status Quo (Rec. Doc. 119) filed in this matter is **GRANTED**.

IT IS FURTHER ORDERED that the affidavit attached to the motion (Rec. Doc. 119-2) is substituted and shall be considered in place of the original Exhibit 4 to the Amended Motion to Intervene and for Temporary Restraining Order and Preliminary Injunction to Maintain the Status Quo (Rec. Doc. 114-10).

Signed in Baton Rouge, Louisiana, on _____.

**SCOTT D. JOHNSON
UNITED STATES MAGISTRATE JUDGE
MIDDLE DISTRICT OF LOUISIANA**