

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

PRESS ROBINSON, EDGAR CAGE,
DOROTHY NAIRNE, EDWIN RENE
SOULE, ALICE WASHINGTON, CLEE
EARNEST LOWE, DAVANTE LEWIS,
MARTHA DAVIS, AMBROSE SIMS,
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
("NAACP") LOUISIANA STATE
CONFERENCE, AND POWER COALITION
FOR EQUITY AND JUSTICE,
Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:22-cv-00211-SDD-RLB

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

v.

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

Defendant.

Civil Action No. 3:22-cv-00214-SDD-RLB

**ROBINSON PLAINTIFFS' SECOND AMENDED LIST OF EXHIBITS FOR
PRELIMINARY INJUNCTION PROCEEDINGS**

Pursuant to the Court's order of April 19, 2022, see ECF No. 63, the *Robinson* Plaintiffs respectfully submit the following list of exhibits they expect to use in connection with the preliminary injunction hearing scheduled to commence on May 9, 2022.

The *Robinson* Plaintiffs expect to use the following exhibits during their case-in-chief and reserve the right to revise or supplement this list, including but not limited to, revisions or supplements in response to Defendants' preliminary injunction submissions. The *Robinson* Plaintiffs further reserve the right to offer additional exhibits on cross-examination or as part of their rebuttal, and reserve the right to offer exhibits listed or offered by any other party to this action, including by the *Galmon* Plaintiffs.

Exhibit No.	Description	Docket No.
PR-1	Declaration of Dr. Press Robinson, dated April 14, 2022	ECF No. 41-3
PR-2	Declaration of Edgar Cage, dated April 14, 2022	ECF No. 41-3
PR-3	Declaration of Dr. Dorothy Nairne, dated April 14, 2022	ECF No. 41-3
PR-4	Declaration of Edwin René Soulé, dated April 14, 2022	ECF No. 41-3
PR-5	Declaration of Dr. Alice Washington, dated April 14, 2022	ECF No. 41-3
PR-6	Declaration of Clee Earnest Lowe, dated April 14, 2022	ECF No. 41-3
PR-7	Declaration of Davante Lewis, dated April 14, 2022	ECF No. 41-3
PR-8	Declaration of Martha Davis, dated April 14, 2022	ECF No. 41-3
PR-9	Declaration of Ambrose Sims, dated April 14, 2022	ECF No. 41-3
PR-10	Declaration of Michael W. McClanahan, dated April 14, 2022	ECF No. 41-3
PR-11	Declaration of Ashley Shelton, dated April 14, 2022	ECF No. 41-3
PR-12	Expert Report of Dr. Lisa Handley, dated April 14, 2022	ECF No. 41-3
PR-13	Expert Report of Dr. Blakeslee Gilpin, dated April 14, 2022	ECF No. 41-3

Exhibit No.	Description	Docket No.
PR-14	Expert Report of Dr. Traci Burch, dated April 14, 2022	ECF No. 41-3
PR-15	Expert Report of Anthony Fairfax, dated April 14, 2022	ECF No. 41-2
PR-16	H.B. 1, 1st Spec. Sess. (La. 2022)	N/A
PR-17	S.B. 5, 1st Spec. Sess. (La. 2022)	N/A
PR-18	H.B. 4, 1st Spec. Sess. (La. 2022)	N/A
PR-19	H.B. 5, 1st Spec. Sess. (La. 2022)	N/A
PR-20	H.B. 7, 1st Spec. Sess. (La. 2022)	N/A
PR-21	H.B. 8, 1st Spec. Sess. (La. 2022)	N/A
PR-22	H.B. 9, 1st Spec. Sess. (La. 2022)	N/A
PR-23	H.B. 12, 1st Spec. Sess. (La. 2022)	N/A
PR-24	S.B. 2, 1st Spec. Sess. (La. 2022)	N/A
PR-25	S.B. 4, 1st Spec. Sess. (La. 2022)	N/A
PR-26	S.B. 6, 1st Spec. Sess. (La. 2022)	N/A
PR-27	S.B. 9, 1st Spec. Sess. (La. 2022)	N/A
PR-28	S.B. 10, 1st Spec. Sess. (La. 2022)	N/A
PR-29	S.B. 11, 1st Spec. Sess. (La. 2022)	N/A
PR-30	S.B. 16, 1st Spec. Sess. (La. 2022)	N/A
PR-31	S.B. 18, 1st Spec. Sess. (La. 2022)	N/A
PR-32	Amendment #88 to H.B. 1, 1st Spec. Sess. (La. 2022)	N/A
PR-33	Amendment #99 to H.B. 1, 1st Spec. Sess. (La. 2022)	N/A
PR-34	Amendment #153 to H.B. 1, 1st Spec. Sess. (La. 2022)	N/A
PR-35	Amendment #62 to S.B. 2, 1st Spec. Sess. (La. 2022)	N/A
PR-36	Amendment #116 to S.B. 5, 1st Spec. Sess. (La. 2022)	N/A
PR-37	Amendment #91 to S.B. 5, 1st Spec. Sess. (La. 2022)	N/A
PR-38	Monroe Roadshow transcript, dated October 20, 2021	N/A
PR-39	Shreveport Roadshow transcript, dated October 21, 2021	N/A
PR-40	Lafayette Roadshow transcript, dated October 26, 2021	N/A
PR-41	Alexandra Roadshow transcript, dated November 9, 2021	N/A
PR-42	Baton Rouge Roadshow transcript, dated November 16, 2021	N/A
PR-43	Covington Roadshow transcript, dated November 30, 2021	N/A
PR-44	Lake Charles Roadshow transcript, dated December 15, 2021	N/A
PR-45	New Orleans Roadshow transcript, dated January 5, 2022	N/A
PR-46	Thibodaux Roadshow transcript, dated January 11, 2022	N/A
PR-47	Joint Governmental Affairs Committee Hearing transcript, dated January 20, 2022	N/A
PR-48	Special Session HGA Committee Transcript, dated May 26, 2021	N/A
PR-49	Special Session SGA Committee Transcript, dated June 2, 2021 Part 1	N/A
PR-50	Special Session SGA Committee Transcript, dated June 2, 2021 Part 2	N/A
PR-51	Special Session JGA Committee Transcript, dated September 17, 2021	N/A
PR-52	Special Session SGA Committee Transcript, dated February 2, 2022	N/A

Exhibit No.	Description	Docket No.
PR-53	Special Session SGA Committee Transcript, dated February 3, 2022 Part 1	N/A
PR-54	Special Session SGA Committee Transcript, dated February 3, 2022 Part 2	N/A
PR-55	Special Session SGA Committee Transcript, dated February 3, 2022 Part 3	N/A
PR-56	Special Session HGA Committee Transcript, dated February 4, 2022	N/A
PR-57	Special Session SGA Committee Transcript, dated February 4, 2022	N/A
PR-58	Special Session HGA Committee Transcript, dated February 7, 2022	N/A
PR-59	Special Session SGA Committee Transcript, dated February 7, 2022	N/A
PR-60	Special Session HGA Committee Transcript, dated February 8, 2022	N/A
PR-61	Special Session SGA Committee Transcript, dated February 8, 2022	N/A
PR-62	Special Session HGA Committee Transcript, dated February 9, 2022	N/A
PR-63	Special Session SGA Committee Transcript, dated February 9, 2022	N/A
PR-64	Special Session HGA Committee Transcript, dated February 10, 2022	N/A
PR-65	Special Session HGA Committee Transcript, dated February 11, 2022	N/A
PR-66	Special Session HGA Committee Transcript, dated February 14, 2022	N/A
PR-67	Special Session SGA Committee Transcript, dated February 14, 2022	N/A
PR-68	Special Session HGA Committee Transcript, dated February 15, 2022	N/A
PR-69	Special Session SGA Committee Transcript, dated February 15, 2022	N/A
PR-70	Special Session HGA Committee Transcript, dated February 16, 2022	N/A
PR-71	Special Session Senate Full Floor Debate, dated February 8, 2022	N/A
PR-72	Special Session House Full Floor Debate, dated February 10, 2022	N/A
PR-73	Special Session Senate Full Floor Debate, dated February 17, 2022	N/A
PR-74	Special Session House Full Floor Debate, dated February 18, 2022 Part 1	N/A
PR-75	Special Session House Full Floor Debate, dated February 18, 2022 Part 2	N/A
PR-76	Special Session Senate Full Floor Debate, dated February 18, 2022 Part 1	N/A
PR-77	Special Session Senate Full Floor Debate, dated February 18, 2022 Part 2	N/A
PR-78	Special Session Senate Full Floor Debate, dated February 18, 2022 Part 3	N/A
PR-79	Louisiana State Legislature Joint Rule 21 (publicly available at: https://www.legis.la.gov/Legis/Law.aspx?d=1238755)	ECF No. 41-3
PR-80	Web page, 2022 Elections, La. Sec'y of State, (publicly available at: https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf)	ECF No. 41-3
PR-81	Letter to the Louisiana State and Governmental Affairs Committee from Michael Pernick, et al., dated December 14, 2021 (publicly available at: https://www.naacpldf.org/wp-content/uploads/2021.12.14-Louisiana-Congressional-Redistricting-Advocacy-Follow-Up-Letter.pdf)	ECF No. 41-3
PR-82	Letter to Clay J. Schexnayder, Speaker of the Louisiana House of Representatives, from Governor John Bel Edwards, dated March 9, 2022 (publicly available at: https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf)	ECF No. 41-3

Exhibit No.	Description	Docket No.
PR-83	<i>NOLA.com</i> article entitled, "With Clear Path to Re-Election, Cedric Richmond Can Look to a Bigger Platform in Democrats' Future." dated October 23, 2018 (publicly available at: https://www.nola.com/news/article_c4191476-a8f8-58b6-93af-5d8663ed3731.html)	ECF No. 41-3
PR-84	Letter to Jimmy Dimos, then-Speaker of the Louisiana House of Representatives, from John R. Dunne, then-Assistant Attorney General for Civil Rights, dated July 15, 1991 (publicly available at: https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/LA-1730.pdf)	ECF No. 41-3
PR-85	<i>NOLA.com</i> article entitled "Steve Scalise's Attendance at 2002 White Nationalists Event Ignites Political Firestorm." dated December 30, 2014 (publicly available at: https://www.nola.com/news/politics/article_b608193c-c9f4-531a-8e24-01534407c15a.html)	ECF No. 41-3
PR-86	Supplemental Expert Report of Anthony Fairfax, dated May 2, 2022	ECF No. 123
PR-87	Supplemental Expert Report of Dr. Lisa Handley, dated May 2, 2022	ECF No. 123
PR-88	Supplemental Expert Report of Dr. Blakeslee Gilpin, dated May 2, 2022	ECF No. 123
PR-89	Supplemental Expert Report of Dr. Traci Burch, dated May 2, 2022	ECF No. 123
PR-90	Second Supplemental Expert Report of Anthony Fairfax, dated May 6, 2021	N/A
PR-91	Second Supplemental Expert Report of Dr. Lisa Handley, dated May 6, 2021	N/A

By: /s/John Adcock

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record, on this 6th Day of May, 2022.

By: /s/ John Adcock

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