

**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' 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.<sup>1</sup>

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.

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No.</b>
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

<sup>1</sup> Because the deadline for exhibit lists preceded the deadline for the *Robinson* Plaintiffs' reply in support of their motion for preliminary injunction, they file this amended list to reflect the supplemental expert reports filed with their reply.

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No.</b>
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
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

<b>Exhibit No.</b>	<b>Description</b>	<b>Docket No.</b>
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
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: <a href="https://www.legis.la.gov/Legis/Law.aspx?d=1238755">https://www.legis.la.gov/Legis/Law.aspx?d=1238755</a> )	ECF No. 41-3
PR-80	Web page, 2022 Elections, La. Sec'y of State, (publicly available at: <a href="https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf">https://www.sos.la.gov/ElectionsAndVoting/PublishedDocuments/ElectionsCalendar2022.pdf</a> )	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: <a href="https://www.naacpldf.org/wp-content/uploads/2021.12.14-Louisiana-Congressional-Redistricting-Advocacy-Follow-Up-Letter.pdf">https://www.naacpldf.org/wp-content/uploads/2021.12.14-Louisiana-Congressional-Redistricting-Advocacy-Follow-Up-Letter.pdf</a> )	ECF No. 41-3

Exhibit No.	Description	Docket No.
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: <a href="https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf">https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf</a> )	ECF No. 41-3
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: <a href="https://www.nola.com/news/article_c4191476-a8f8-58b6-93af-5d8663ed3731.html">https://www.nola.com/news/article_c4191476-a8f8-58b6-93af-5d8663ed3731.html</a> )	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: <a href="https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/LA-1730.pdf">https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/LA-1730.pdf</a> )	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: <a href="https://www.nola.com/news/politics/article_b608193c-c9f4-531a-8e24-01534407c15a.html">https://www.nola.com/news/politics/article_b608193c-c9f4-531a-8e24-01534407c15a.html</a> )	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

By: /s/John Adcock

John Adcock  
Adcock Law LLC  
L.A. Bar No. 30372  
3110 Canal Street  
New Orleans, LA 70119  
Tel: (504) 233-3125  
Fax: (504) 308-1266  
jnadcock@gmail.com

Leah Aden (admitted *pro hac vice*)  
Stuart Naifeh (admitted *pro hac vice*)  
Kathryn Sadasivan (admitted *pro hac vice*)  
Victoria Wenger (admitted *pro hac vice*)  
NAACP Legal Defense and Educational Fund,  
Inc.  
40 Rector Street, 5th Floor  
New York, NY 10006  
Tel: (212) 965-2200  
laden@naacplef.org  
snaifeh@naacpldf.org  
ksadasivan@naacpldf.org  
vwenger@naacpldf.org

R. Jared Evans (admitted *pro hac vice*)  
Sara Rohani (admitted *pro hac vice*)<sup>†</sup>  
NAACP Legal Defense and Educational Fund,  
Inc.  
700 14th Street N.W. Ste. 600  
Washington, DC 20005  
Tel: (202) 682-1300  
jevans@naacpldf.org  
srohani@naacpldf.org

Nora Ahmed (admitted *pro hac vice*)  
Megan E. Snider  
LA. Bar No. 33382  
ACLU Foundation of Louisiana  
1340 Poydras St, Ste. 2160  
New Orleans, LA 70112  
Tel: (504) 522-0628  
nahmed@laaclu.org  
msnider@laaclu.org

Tracie Washington  
LA. Bar No. 25925  
Louisiana Justice Institute  
Suite 132  
3157 Gentilly Blvd  
New Orleans LA, 70122  
Tel: (504) 872-9134  
tracie.washington.esq@gmail.com

Robert A. Atkins (admitted *pro hac vice*)  
Yahonnes Cleary (admitted *pro hac vice*)  
Jonathan H. Hurwitz (admitted *pro hac vice*)  
Daniel S. Sinnreich (admitted *pro hac vice*)  
Amitav Chakraborty (admitted *pro hac vice*)  
Adam P. Savitt (admitted *pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue Of The Americas, New York,  
NY 10019  
Tel.: (212) 373-3000  
Fax: (212) 757-3990  
ratkins@paulweiss.com  
ycleary@paulweiss.com  
jhurwitz@paulweiss.com  
dsinnreich@paulweiss.com  
achakraborty@paulweiss.com  
asavitt@paulweiss.com

T. Alora Thomas (admitted *pro hac vice*)  
Sophia Lin Lakin (admitted *pro hac vice*)  
Samantha Osaki (admitted *pro hac vice*)  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
athomas@aclu.org  
slakin@aclu.org  
sosaki@aclu.org

Sarah Brannon (admitted *pro hac vice*)  
American Civil Liberties Union Foundation  
915 15th St., NW  
Washington, DC 20005  
sbrannon@aclu.org

† Admitted in California only. Practice limited to matters in United States federal courts.

*Counsel for Plaintiffs*

**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 3rd Day of May, 2022.

By: /s/ John Adcock

John Adcock

Adcock Law LLC

L.A. Bar No. 30372

3110 Canal Street

New Orleans, LA 70119

Tel: (504) 233-3125

Fax: (504) 308-1266

[jnadcock@gmail.com](mailto:jnadcock@gmail.com)