

**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,

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

v.

NANCY LANDRY, in her official capacity as
Secretary of State for Louisiana,

Defendant.

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

Plaintiffs,

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

v.

NANCY LANDRY, in her official capacity as
Secretary of State for Louisiana,

Defendant.

**GALMON PLAINTIFFS' MOTION TO RECONSIDER DISMISSAL RULING AND TO
SCHEDULE REMEDIAL PROCEEDINGS**

Pursuant to Federal Rule of Civil Procedure 59(e), Edward Galmon, Sr., Ciara Hart, Norris Henderson, and Tramelle Howard (“*Galmon* Plaintiffs”) respectfully move for reconsideration of this Court’s April 25, 2024, ruling granting Defendants’ Motion to Dismiss, ECF No. 371. As explained in the accompanying memorandum of law, the Western District of Louisiana’s permanent injunction prohibiting the use of S.B. 8 deprives *Galmon* Plaintiffs of a congressional districting map that complies with Section 2 of the Voting Rights Act—the same injury for which they have sought a remedy in this Court for the past two years. Because that injury is once again presently existing—and no longer speculative or hypothetical—*Galmon* Plaintiffs’ claims are no longer moot. Should the Court reconsider its order on Defendants’ motion to dismiss, *Galmon* Plaintiffs respectfully request that the Court also reconsider its combined order denying then-pending motions in limine. *See id.* at 13–14. Consistent with the Fifth Circuit’s expectation that a lawful, Section 2-compliant map will be in place “to be used for the 2024 Louisiana congressional elections,” *Robinson v. Ardoin*, 86 F.4th 574, 584 (5th Cir. 2023), this Court should proceed directly to the remedial proceedings for which the parties have already fully prepared.

Date: May 1, 2024

Respectfully submitted,

By: /s/Abha Khanna

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