

Via electronic filing

Chief Judge Shelly D. Dick
U.S. District Court Middle District of Louisiana
777 Florida Street, Suite 301
Baton Rouge, LA 70801

June 24, 2026

Re: *Nairne, et al. v. Ardoin, et al.*, Case No. 3:22-cv-00178

Dear Judge Dick,

We write in anticipation of the status conference before the Court scheduled for June 25, 2026. As this Court is aware, the Fifth Circuit Court of Appeals vacated its decision in *Nairne v. Landry*, No. 24-30115, vacated this Court's decision in this matter, *Nairne v. Ardoin*, 715 F. Supp. 3d 808 (M.D. La. 2024), and remanded to this Court for further consideration of this case in light of the Supreme Court's decision in *Louisiana v. Callais*, 146 S. Ct. 1131 (2026).

Given the Fifth Circuit's remand, reopening the trial record in this action in order to supplement it with additional, albeit limited, testimony called for by the *Callais* decision is appropriate here.¹ Plaintiffs will be prepared to discuss the time needed to conduct such limited, supplemental discovery necessitated by the *Callais* decision, as well as the schedule for a hearing on that testimony at the upcoming status conference. Plaintiffs look forward to the Court's guidance on this matter and appreciate the Court's consideration.

Respectfully submitted,

Sarah Brannon
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
915 15th St., NW
Washington, DC 20005
(740) 632-0671
sbrannon@aclu.org

John Adcock
ADCOCK LAW LLC
3110 Canal Street
New Orleans, LA 70119
Tel: (504) 233-3125
Fax: (504) 308-1266
jnadcock@gmail.com

Sophia Lin Lakin
Dayton Campbell-Harris
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004

Nora Ahmed
ACLU FOUNDATION OF LOUISIANA
1340 Poydras St., Ste. 2160
New Orleans, LA 70112
(504) 522-0628
nahmed@laaclu.org

¹ Plaintiffs also intend to rely on the significant portions of the trial record already before the Court—much of which remains relevant to Plaintiffs' claims, even under the revised standard for Section 2 liability set by *Callais*—to prove their claims.

slakin@aclu.org
dcampbellharris@aclu.org

Michael de Leeuw
Amanda Giglio
Robert Clark
COZEN O'CONNOR
3 WTC, 175 Greenwich St., 55th Floor
New York, NY 10007
MdeLeeuw@cozen.com
AGiglio@cozen.com

Josephine Bahn
COZEN O'CONNOR
1200 19th Street NW
Washington, D.C. 20036
JBahn@cozen.com

T. Alora Thomas-Lundborg
RACE AND JUSTICE LAW CLINIC
HARVARD LAW SCHOOL
6 Everett Street, Ste. 4105
Cambridge, MA 02138
tthomaslundborg@law.harvard.edu

Stuart Naifeh
Victoria Wenger
Colin Burke
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
(212) 965-2200
snaifeh@naacpldf.org
vwenger@naacpldf.org
cburke@naacpldf.org

I. Sara Rohani
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th Street N.W. Ste. 600
Washington, DC 20005
(202) 682-1300
srohani@naacpldf.org

RETRIEVED FROM DEMOCRACYDOCS.ORG