

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

**VOICE of the EXPERIENCED, on behalf of
itself and its members; POWER COALITION
for EQUITY and JUSTICE, on behalf of itself
and its members; and LEAGUE of WOMEN
VOTERS of LOUISIANA, on behalf of itself
and its members**

Case: 3:23-cv-00331-JWD-SDJ

v.

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

DEFENDANT'S EXHIBIT LIST

NOW INTO COURT, through undersigned counsel, comes Defendant, R. Kyle Ardoin in his official capacity as Secretary of State of Louisiana, who submits the following list of exhibits for the October 25, 2023, hearing on Plaintiffs' Motion for Preliminary Injunction, pursuant to the Court's July 10, 2023, order (R. Doc. 61).

1. La. R.S. 18:177
2. Act 1420 of 1997 Session of Louisiana Legislature
3. Act 1381 of 1999 Regular Session of Louisiana Legislature
4. Louisiana Attorney General Opinion No. 99-275
5. Act 138 of 2012 Regular Session of Louisiana Legislature
6. *Voice of the Ex Offender v. State*, 2017-1141 (La. App. 1 Cir. 4/13/2018), 249 So.3d 857
7. *Voice of the Ex Offender v. State*, 2018-0945 (La. 10/19/2018), 255 So. 3d 575
8. Act 636 of 2018 Regular Session of the Louisiana Legislature (effective 3/1/2019)
9. Act 127 of 2021 Regular Session of Louisiana Legislature (effective 2/1/2022)
10. September 21, 2022 letter to Registrar of Voters from Secretary of State, State of Louisiana, regarding Act 127 of 2021 Regular Session of Louisiana Legislature
11. August 30, 2022 Notice from CLC and Advancement Project, on behalf Power Coalition for Equity and Justice and the League of Women Voters of Louisiana to Louisiana Secretary of State, R. Kyle Ardoin

12. September 23, 2022 letter from Louisiana Secretary of State Re: August 30, 2022 Notice to Louisiana Secretary of State, R. Kyle Ardoin, Regarding Alleged Compliance with National Voter Registration Act – to Blair Bowie, Valencia Richardson, Campaign Legal Center, William P. Quigley, Loyola University Law New Orleans College of Law, Eddie Hailes, Miriam Nemerck, Jennifer Lai-Peterson, Advancement Project National Office
13. October 28, 2022 letter from CLC and Advancement Project, on behalf Power Coalition for Equity and Justice and the League of Women Voters of Louisiana to Louisiana Secretary of State, R. Kyle Ardoin
14. March 8, 2023 letter from Attorney Celia Cangelosi on behalf of Louisiana Secretary of State, Re: August 30, 0222 Notice To Louisiana Secretary of State, R. Kyle Ardoin, Regarding Alleged Non-Compliance with National Voter Registration Act to Blair Bowie, Valencia Richardson, Campaign Legal Center, William P. Quigley, Loyola University Law New Orleans College of Law, Eddie Hailes, Miriam Nemerck, Jennifer Lai-Peterson, Advancement Project National Office
15. March 31, 2023 letter from CLC and Advancement Project, on behalf of Power Coalition for Equity and Justice and the League of Women Voters, joined by Voice of the Experienced, to R. Kyle Ardoin, Louisiana Secretary of State
16. Discovery responses from Plaintiffs
 - a) 6/23/23 Plaintiffs’ Response to Defendant’s First Discovery Request, including Ex. A (subject to Protective Order);
 - b) 7/6/23 Plaintiffs’ First Response to First Set of Interrogatories from Defendant, including Ex. A (subject to Protective Order);
 - c) 7/19/23 Plaintiffs’ First Response to First Set of Interrogatories from Defendant, Ex. A (subject to Protective Order)
17. Declaration of Bradley Robert Harris, Information Technology Administrator, dated July 28, 2023 (Doc 70-1)
18. Declaration of Sherri Wharton Hadskey, Louisiana Commissioner of Elections, dated July 28, 2023 (Doc 70-2)
 - a) Hadskey Attachment A – “2023 Ballot Box” (Doc 70-3)
 - b) Voter Election History Report, Hadskey Attachment 1 (Doc 70-4)
 - c) Voter Election History Report, Hadskey Attachment 2 (Doc 70-5)
 - d) Voter Election History Report, Hadskey Attachment 3 (Doc 70-6)
 - e) Voter Election History Report, Hadskey Attachment 4 (Doc 70-7)
 - f) Voter Election History Report, Hadskey Attachment 5 (Doc 70-8)
 - g) Voter Election History Report, Hadskey Attachment 6 (Doc 70-9)

- h) Voter Election History Report, Hadskey Attachment 7 (Doc 70-10)
 - i) Voter Election History Report, Hadskey Attachment 8 (Doc 70-11)
 - j) Voter Election History Report, Hadskey Attachment 9 (Doc 70-12)
 - k) Voter Election History Report, Hadskey Attachment 10 (Doc 70-13)
 - l) Voter Election History Report, Hadskey Attachment 11 (Doc 70-14)
 - m) Voter Election History Report, Hadskey Attachment 12 (Doc 70-15)
19. Articles of Incorporation of Voice of the Ex-Offender (March 24, 2004)
 20. State of Louisiana – Name Change Amendment (11/21/2016), Voice of the Ex-Offender to Voice of the Experienced
 21. Excerpt from website, Voice of the Experienced, Voting Rights (<https://voiceoftheexperienced.org/voting-rights>) (last accessed 10/1/23)
 22. Any exhibit listed by any other party to this proceeding
 23. Any exhibit necessary for impeachment or rebuttal purposes

Respectfully submitted:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of October, 2023, a copy of the foregoing has on this date been served upon all counsel of record via CM/ECF system and has been filed electronically with the Clerk of Court using the CM/ECF system.

/s/ Caroline M. Tomeny
Caroline M. Tomeny

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