

**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*;

**AMENDED EXHIBIT LIST**

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

*Plaintiffs,*

v.

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

*Defendant.*

PRESIDING JUDGE Hon. John W. deGravelles	PLAINTIFF'S ATTORNEY Valencia Richardson <i>et al.</i>	DEFENDANT'S ATTORNEY Celia R. Cangelosi <i>et al.</i>
HEARING DATE(S) October 25, 2023	COURT REPORTER Gina Delatte-Richard	COURTROOM DEPUTY Kristie Causey

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBIT
1					Letter dated August 22, 2022 from Power Coalition for Equity and Justice and League of Women Voters of Louisiana to Defendant
2					Letter dated September 22, 2022 from Defendant
3					Letter dated October 28, 2022 from Power Coalition for Equity and Justice and League of Women Voters of Louisiana to Defendant
4					Letter dated February 17, 2023 from Defendant's counsel to Plaintiffs' counsel re: Plaintiffs' NVRA records request
5					Records responsive to Plaintiffs' NVRA records request
6					Letter dated March 8, 2023 from Defendant's counsel to Plaintiffs' counsel
7					Letter dated March 31, 2023 from Plaintiffs to Defendant
8					Letter dated October 22, 2020 from Voice of the Experienced to Defendant
9					Declaration of Norris Henderson
10					Declaration of Nziki Wiltz
11					Declaration of Gregory Finney
12					Declaration of M. Christian Green
13					Declaration of Ashley Shelton
14					Federal Voter Registration Form
15					Louisiana Voter Registration Form
16					Excerpt from HB 396 Hearing
17					Act 127
18					HB 396

19					May 2023 white paper “No Surrender, No Retreat!” by Voice of the Experienced <i>et al.</i>
20					Act 636
21					List of currently suspended voters
22					List of currently ineligible voters
23					PCEJ 2022 Annual Report
24					PCEJ 2020 Annual Report
25					PCEJ Election Mailer
26					PCEJ Events October 2023
27					PCEJ Get Out and Vote Page Screenshot (10-01-2023)
28					PCEJ FIP FAQ Screenshot (10-02-2023)
29					PCEJ Door and Texting Scripts
30					Expert Report of Traci Burch, Ph.D.
31					LWVLA 2023 Grant Budget Request
32					LWVLA 2023 Grant Budget
33					LWVLA Voter Information Event Flyer (04-13-2019)
34					LWVLA Program for Voter Information Event (04-13-2019)
35					LWVLA Voter Information Event Press Release (04-13-2019)
36					VOTE webpage on felony disenfranchisement in Louisiana
37					Example of Voting Rights Certification
38					VOTE members on state lists (Subject to Protective Order)
39					Letter dated September 14, 2023 from Orleans Parish Registrar to Wayne Chester
40					Voter registration card for Wayne Chester

Plaintiffs reserve the right to rely on any exhibits listed by any other party to this proceeding and any exhibit necessary for impeachment or rebuttal purposes

Respectfully submitted this 19th day of October, 2023.

/s/Valencia Richardson

Valencia Richardson (LSBA #39312)

Danielle Lang\*

Blair Bowie\*

Ellen Boettcher\*

Kate Uyeda\*

Campaign Legal Center

1101 14th St. NW Suite 400

Washington, DC 20005

(202) 736-2200

[dlang@campaignlegal.org](mailto:dlang@campaignlegal.org)

[bbowie@campaignlegal.org](mailto:bbowie@campaignlegal.org)

[vrichardson@campaignlegal.org](mailto:vrichardson@campaignlegal.org)

[kuyeda@campaignlegal.org](mailto:kuyeda@campaignlegal.org)

[eboettcher@campaignlegal.org](mailto:eboettcher@campaignlegal.org)

William P. Quigley (LSBA #07769)

Loyola University Law New Orleans

College of Law

7214 St. Charles Ave. Campus Box 902

New Orleans, LA 70118

[Quigley77@gmail.com](mailto:Quigley77@gmail.com)

*\*admitted pro hac vice*

RETRIEVED FROM DEMOCRACYDOCKET.COM

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, October 19, 2023, I electronically filed the foregoing Motion with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to counsel of record who are registered with the Court's CM/ECF system.

/s/ Valencia Richardson  
Valencia Richardson  
*Counsel for Plaintiffs*

RETRIEVED FROM DEMOCRACYDOCKET.COM