

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILIP CALLAIS, LLOYD PRICE, )  
BRUCE ODELL, ELIZABETH ERSOFF, )  
ALBERT CAISSIE, DANIEL WEIR, )  
JOYCE LACOUR, CANDY CARROLL )  
PEAVY, TANYA WHITNEY, MIKE )  
JOHNSON, GROVER JOSEPH REES, )  
ROLFE MCCOLLISTER, )

Plaintiffs, )

v. )

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL )  
CAPACITY AS LOUISIANA )  
SECRETARY OF STATE, )

Defendant. )

**JOINT STIPULATIONS FOR APRIL 8, 2024 BENCH TRIAL**

COME NOW Plaintiffs Philip Callais, Lloyd Price, Bruce Odell, Elizabeth Ersoff, Albert Caissie, Daniel Weir, Joyce LaCour, Candy Carroll Peavy, Tanya Whitney, Mike Johnson, Grover Joseph Rees, and Rolfe McCollister (collectively, “Plaintiffs”), as well as Defendant Secretary of State Nancy Landry, Defendant-Intervenor the State of Louisiana, and Defendant-Intervenors Press Robinson, Edgar Cage, Dorothy Nairne, Edwin Rene Soule, Alice Washington, Clee Earnest Lowe, Davante Lewis, Martha Davis, Ambrose Sims, the National Association for the Advancement of Colored People Louisiana State Conference, and the Power Coalition for Equity and Justice (collectively, “Robinson Intervenors”) (altogether, the “Parties”), by and through counsel and stipulate the following:

**The Parties**

1. Plaintiff Philip Callais is a registered voter of District 6.
2. Plaintiff Albert Caissie, Jr., is a registered voter of District 5.

3. Plaintiff Elizabeth Ersoff is a registered voter of District 6.
4. Plaintiff Grover Joseph Rees is a registered voter of District 6.
5. Plaintiff Lloyd Price is a registered voter of District 6.
6. Plaintiff Rolfe McCollister is a registered voter of District 5.
7. Plaintiff Candy Carroll Peavy is a registered voter of District 4.
8. Plaintiff Mike Johnson is a registered voter of District 4.
9. Plaintiff Bruce Odell is a registered voter of District 3.
10. Plaintiff Joyce LaCour is a registered voter of District 2.
11. Plaintiff Tanya Whitney is a registered voter of in District 1.
12. Plaintiff Danny Weir, Jr., is a registered voter of District 1.
13. Defendant Secretary of State Nancy Landry is “the chief election officer of the state.” La. Const. art. 4, § 7; La. R.S. § 18:421. The State Constitution requires her to “prepare and certify the ballots for all elections, promulgate all election returns, and administer the election laws, except those relating to voter registration and custody of voting machines.” La. Const. art. 4, § 7. Her oversight of elections extends to federal congressional elections. La. R.S. §§ 18:452, 18:462.
14. Intervenor-Defendant the State of Louisiana is represented by Attorney General Elizabeth Murrill. As Attorney General, she is Louisiana’s “chief legal officer,” is charged with “the assertion and protection of the rights and interests” of the State of Louisiana, and has a sworn duty to uphold the State’s Constitution and laws. La. Const. art. IV., § 8.
15. Robinson Intervenor-Defendants are Black Louisiana voters and civil rights organizations. They were Plaintiffs in *Robinson, et al. v. Landry*, No. 3:22-cv-02111-SDD-

SDJ (M.D. La.) which challenged Louisiana's congressional map as a violation of Section 2 of the Voting Rights Act.

Dated this 5th day of April, 2024

Respectfully submitted,

**PAUL LOY HURD, APLC**

/s/ Paul Loy Hurd

Paul Loy Hurd  
Louisiana Bar No. 13909  
Paul Loy Hurd, APLC  
1896 Hudson Circle, Suite 5  
Monroe, Louisiana 71201  
Tel.: (318) 323-3838  
paul@paulhurdlawoffice.com

**GRAVES GARRETT GREIM LLC**

/s/ Edward D. Greim

Edward D. Greim,\* Missouri Bar No. 54034  
A. Bradley Bodamer,\* Missouri Bar No. 28676  
Matthew Mueller\*, Missouri Bar No. 70263  
Jackson Tyler,\* Missouri Bar No. 73115  
Katherine Graves,\* Missouri Bar No. 74671  
\*Admitted Pro Hac Vice

**GRAVES GARRETT GREIM LLC**

1100 Main Street, Suite 2700  
Kansas City, Missouri 64105  
Tel.: (816) 256-3181  
Fax: (816) 256-5958  
[edgreim@gravesgarrett.com](mailto:edgreim@gravesgarrett.com)  
[bbodamer@gravesgarrett.com](mailto:bbodamer@gravesgarrett.com)  
[mmueller@gravesgarrett.com](mailto:mmueller@gravesgarrett.com)  
[jtyler@gravesgarrett.com](mailto:jtyler@gravesgarrett.com)  
[kgraves@gravesgarrett.com](mailto:kgraves@gravesgarrett.com)

*Counsel for Plaintiffs*

Jason B. Torchinsky (DC Bar No 976033)\*  
HOLTZMAN VOGEL BARAN  
TORCHINSKY & JOSEFIAK, PLLC  
2300 N Street, NW  
Suite 643A  
Washington, DC 20037  
Tel: 202-737-8808  
Email: jtorchinsky@holtzmanvogel.com

/s/ Carey Tom Jones  
Carey Tom Jones (LSBA No. 07474)  
Office of the Attorney General  
Louisiana Department of Justice  
1885 N. Third St.  
Baton Rouge, LA 70804  
(225) 326-6000 phone  
(225) 326-6098 fax  
jonescar@ag.louisiana.gov

Phillip M. Gordon (VA Bar No. 95621)\*  
Zachary D. Henson (NY Bar No. 5907340)\*  
HOLTZMAN VOGEL BARAN

*Counsel for Intervenor-Defendant the State of Louisiana*

TORCHINSKY & JOSEFIAK, PLLC  
15405 John Marshall Hwy.  
Haymarket, VA 20169  
Telephone: (540) 341-8808  
Facsimile: (540) 341-8809  
Email: pgordon@holtzmanvogel.com  
zhenson@holtzmanvogel.com

Brennan A.R. Bowen (AZ Bar No.  
036639)\*  
Drew C. Ensign (DC Bar No. 976571)\*\*  
HOLTZMAN VOGEL BARAN  
TORCHINSKY & JOSEFIAK, PLLC  
2575 East Camelback Rd, Ste 860  
Phoenix, AZ 85016  
602-388-1262  
Email: bbowen@holtzmanvogel.com

\*admitted *pro hac vice*  
\*\**pro hac vice* motion forthcoming

/s/ Phillip J. Strach  
Phillip J. Strach\* (Lead Counsel)  
phillip.strach@nelsonmullins.com  
Thomas A. Farr\*  
tom.farr@nelsonmullins.com  
Alyssa M. Riggins\*  
alyssa.riggins@nelsonmullins.com  
Cassie A. Holt\*  
cassie.holt@nelsonmullins.com  
**NELSON MULLINS RILEY &  
SCARBOROUGH LLP**  
301 Hillsborough Street, Suite 1400  
Raleigh, NC 27603  
Telephone: (919) 329-3800  
Facsimile: (919) 329-3799

/s/ John C. Walsh  
John C. Walsh (Louisiana Bar Roll No. 24903)  
**SHOWS, CALI & WALSH, L.L.P.**  
628 St. Louis St. (70802)  
P.O. Box 4225  
Baton Rouge, LA 70821

Telephone: (225) 346-1461  
Facsimile: (225) 346-5561  
john@scwllp.com

*\*Admitted pro hac vice*

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

Tracie L. Washington  
LA. Bar No. 25925  
Louisiana Justice Institute  
8004 Belfast Street  
New Orleans, LA 70125  
Tel: (504) 872-9134  
tracie.washington.esq@gmail.com

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

*Counsel for Robinson Intervenors Dorothy Nairne, Martha Davis, Clee Earnest Lowe, and Rene Soule*

*Counsel for Robinson Intervenors*

RETRIEVED FROM DEMOCRACYDOCKET.COM

Stuart Naifeh\*  
Kathryn Sadasivan\*  
Victoria Wenger\*  
Colin Burke\*  
NAACP Legal Defense and  
Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, NY 10006  
Tel: (212) 965-2200  
snaifeh@naacpldf.org  
ksadasivan@naacpldf.org  
vwenger@naacpldf.org  
cburke@naacpldf.org

R. Jared Evans  
LA. Bar No. 34537  
I. Sara Rohani\*  
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

Sarah Brannon\*  
Megan C. Keenan\*  
American Civil Liberties Union Foundation  
915 15th St., NW  
Washington, DC 20005  
sbrannon@aclu.org  
mkeenana@aclu.org

Nora Ahmed  
NY Bar No. 5092374 (pro hac vice  
forthcoming)  
ACLU Foundation of Louisiana  
1340 Poydras St, Ste. 2160  
New Orleans, LA 70112  
Tel: (504) 522-0628  
nahmed@laaclu.org

*Additional counsel for Robinson Intervenors*

\* Admitted pro hac vice.

\*\*Practice is limited to federal court.

Robert A. Atkins\*  
Yahonnes Cleary\*  
Jonathan H. Hurwitz\*  
Amitav Chakraborty\*  
Adam P. Savitt\*  
Arielle B. McTootle\*  
Robert Klein\*  
Neil Chitrao\*  
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  
achakraborty@paulweiss.com  
asavitt@paulweiss.com  
amctootle@paulweiss.com  
rklein@paulweiss.com  
nchitrao@paulweiss.com

Sophia Lin Lakin\*  
Garrett Muscatel\*  
Dayton Campbell-Harris (pro hac vice  
forthcoming)\*  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
slakin@aclu.org  
gmuscatel@aclu.org  
dcampbell-harris@aclu.org

T. Alora Thomas-Lundborg\*  
Daniel Hessel\*  
Election Law Clinic  
Harvard Law School  
6 Everett Street, Ste. 4105  
Cambridge, MA 02138  
(617) 495-5202  
tthomaslundborg@law.harvard.edu  
dhessel@law.harvard.edu