# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA, MONROE DIVISION

PHILLIP 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.

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

Defendant.

Civil Action No. 3:24-cv-00122

Judge David C. Joseph

Circuit Judge Carl E. Stewart

Judge Robert R. Summerhays

# ROBINSON INTERVENORS' SECOND AMENDED LIST OF EXHIBITS AND WITNESSES FOR THE CONSOLIDATED HEARING

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, the "*Robinson* Intervenors") respectfully submit the following second amended list of exhibits they expect to use and witnesses they expect to call in connection with the consolidated hearing beginning April 8, 2024.

## **EXHIBIT LIST**

The *Robinson* Intervenors expect to use the following exhibits during their case-in-chief and reserve the right to revise or supplement this list, including but not limited to, revisions or supplements in response to Plaintiffs', the State's, and the Secretary of State's submissions. The

Robinson Intervenors further reserve the right to offer additional exhibits on cross-examination or as part of their rebuttal; the right to offer additional exhibits to respond to any exhibits or other evidence offered by any party; the right to offer additional exhibits should Plaintiffs or other any other party offer testimony from any undisclosed witness or any witness previously withdrawn (including but not limited to Dr. Sadow); and the right to offer exhibits listed or offered by any other party to this action.

Exhibit	Description
No.	•
RI-1	Expert Report of Anthony Fairfax (and appendices), dated March 27, 2024
RI-2	Expert Report of Dr. Michael Martin, dated March 27, 2024
RI-3	Expert Report of Dr. Cory McCartan, dated March 28, 2024
	Louisiana Special Joint Session – January 15, 2024 (publicly available at
	https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2024/jan/0115_24_2
RI-4	41ES)
RI-5	Transcription of Louisiana Special Joint Session – January 15, 2024
	Louisiana State House and Governmental Affairs Committee Special Session – January
	15, 2024 (publicly available at
RI-6	https://redist.legis.la.gov/default_video?v=house/2024/jan/0115_24_HG)
	Transcription of Louisiana State House and Governmental Affairs Committee Special
RI-7	Session – January 15, 2024
	Louisiana State Senate and Governmental Affairs Committee Special Session – January
	16, 2024 [Part 1] (publicly available at
RI-8	https://senate.la.gov/s_video/VideoArchivePlayer?v=senate/2024/01/011624SG)
	Transcription of Louisiana State Senate and Governmental Affairs Committee Special
RI-9	Session – January 16, 2024 [Part 1]
	Louisiana State Senate and Governmental Affairs Committee Special Session – January
DI 10	16, 2024 [Part 2] (publicly available at
RI-10	https://senate.la.gov/s_video/VideoArchivePlayer?v=senate/2024/01/011624SG2)
D. 1.1	Transcription of Louisiana State Senate and Governmental Affairs Committee Special
RI-11	Session – January 16, 2024 [Part 2]
	Louisiana State House and Governmental Affairs Committee Special Session – January
DI 10	17, 2024 (publicly available at
RI-12	https://redist.legis.la.gov/default_video?v=house/2024/jan/0117_24_HG)
DI 12	Transcription of Louisiana State House and Governmental Affairs Committee Special
RI-13	Session – January 17, 2024
DI 14	Louisiana State Senate Floor Special Session – January 17, 2024 (publicly available at
RI-14	https://senate.la.gov/s_video/VideoArchivePlayer?v=senate/2024/01/011724SCHAMB)
RI-15	Transcription of Louisiana State Senate Floor Special Session – January 17, 2024

Exhibit No.	Description
110.	Louisiana State House and Governmental Affairs Committee Special Session – January
	18, 2024 [Part 1] (publicly available at
RI-16	https://redist.legis.la.gov/default_video?v=house/2024/jan/0118_24_HG_P1)
	Transcription of Louisiana State House and Governmental Affairs Committee Special
RI-17	Session – January 18, 2024 [Part 1]
	Louisiana State House and Governmental Affairs Committee Special Session – January
	18, 2024 [Part 2] (publicly available at
RI-18	https://redist.legis.la.gov/default_video?v=house/2024/jan/0118_24_HG_P2)
	Transcription of Louisiana State House and Governmental Affairs Committee Special
RI-19	Session – January 18, 2024 [Part 2]
	Louisiana State House Floor Special Session – January 19, 2024 (publicly available at
D	https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2024/jan/0119_24_1
RI-20	ES_Day5)
RI-21	Transcription of Louisiana State House Floor Special Session January 19, 2024
D1 22	Louisiana State Senate Floor Special Session – January 19, 2024 (publicly available at
RI-22	https://senate.la.gov/s_video/VideoArchivePlayer?v=senate/2024/01/011924SCHAMB2)
RI-23	Transcription of Louisiana State Senate Floor Special Session – January 19, 2024
RI-24	H.B. 14, 1st Spec. Sess. (La. 2024) - Engrossed
RI-25	H.B. 14, 1st Spec. Sess. (La. 2024) - Original
RI-26	H.B. 19, 1st Spec. Sess. (La. 2024)
RI-27 RI-28	H.B. 2, 1st Spec. Sess. (La. 2024)
RI-28	H.B. 5, 1st Spec. Sess. (La. 2024) S.B. 10, 1st Spec. Sess. (La. 2024)
RI-29	S.B. 4, 1st Spec. Sess. (La. 2024)
RI-30	S.B. 8, 1st Spec. Sess. (La. 2024) - Act No. 2
RI-31	S.B. 8, 1st Spec. Sess. (La. 2024) - Act 100. 2  S.B. 8, 1st Spec. Sess. (La. 2024) - Engrossed
RI-33	S.B. 8, 1st Spec. Sess. (La. 2024) - Englossed  S.B. 8, 1st Spec. Sess. (La. 2024) - Enrolled
RI-34	S.B. 8, 1st Spec. Sess. (La. 2024) - House Vote Sheet Final Passage
RI-35	S.B. 8, 1st Spec. Sess. (La. 2024) - House Vote Sheet on Amendment #83
RI-36	S.B. 8, 1st Spec. Sess. (La. 2024) - Original
RI-37	S.B. 8, 1st Spec. Sess. (La. 2024) - Senate Vote Sheet Concur
RI-38	S.B. 8, 1st Spec. Sess. (La. 2024) - Senate Vote Sheet Final Passage
RI-39	Amendment #31 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-40	Amendment #34 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-41	Amendment #38 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-42	Amendment #48 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-43	Amendment #68 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-44	Amendment #70 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-45	Amendment #74 to S.B. 8, 1st Spec. Sess. (La. 2024)
RI-46	Amendment #83 to S.B. 8, 1st Spec. Sess. (La. 2024)

Exhibit	Description
No.	
	Shreveport Times article entitled "Congressman Garret Graves blasts new Louisiana map
	as 'boneheaded' move," dated January 23, 2024 (publicly available at
	https://www.shreveporttimes.com/story/news/2024/01/23/garret-graves-blasts-new-
D. 1.	louisiana-congressional-map-as-boneheaded-move-by-governor-jeff-
RI-47	landry/72318012007/)
	E&E News by POLITICO article entitled "Garret Graves defiant as state lawmakers cut
	up his district," dated January 19, 2024 (publicly available at
DI 40	https://www.eenews.net/articles/garret-graves-defiant-as-state-lawmakers-cut-up-his-
RI-48	district/) Office of Governor Jeff Landry article entitled "Governor Jeff Landry Opens First
	Special Session on Court Ordered Redistricting," dated January 16, 2024 (publicly
	available at https://gov.louisiana.gov/news/governor-jeff-landry-opens-first-special-
	session-on-court-ordered-
	redistricting#:~:text=Baton%20Rouge%2C%20La%20%2D%20Today%2C,make%20ot
RI-49	her%20election%2Drelated%20changes.)
111 .7	Lailluminator.com article entitled "Graves to lose U.S. House seat under Louisiana
	redistricting plan that adds minority seat," dated January 19, 2024 (publicly available at
	https://lailluminator.com/2024/01/19/graves-to-lose-u-s-house-seat-under-louisiana-
	redistricting-plan-that-adds-minority-
	seat/#:~:text=Louisiana%20lawmakers%20gave%20final%20approval,a%20Republican
RI-50	%20from%20Baton%20Rouge.)
	Montana Free Press article entitled "Judge orders redo election for two Kalispell city
	council wards," dated February 22, 2024 (publicly available at
	https://montanafreepress.org/2024/02/22/flathead-county-kalispell-city-council-election-
RI-51	redo-decision/)
DI 50	Liz Murrill Tweet, dated January 16, 2024 (publicly available at
RI-52	https://twitter.com/AGLizMurrill/status/1747376599446516056)
	Lailluminator.com arricle entitled "Louisiana House committee alters, advances
	congressional map with 2nd Black district," dated January 18, 2024 (publicly available at
	https://lailluminator.com/2024/01/18/louisiana-house-committee-alters-advances-congressional-map-with-2nd-black-
	district/#:~:text=A%20Louisiana%20legislative%20committee%20advanced,Senate%20
RI-53	Bill%208%20by%20Sen.)
10.55	Lailluminator.com article entitled "Louisiana's special session on election matters:
	Winner and Losers," dated January 20, 2024 (publicly available at
	https://lailluminator.com/2024/01/20/louisianas-special-session-on-election-matters-
RI-54	winners-and-losers/)
	Nola.com article entitled "Rep. Garret Graves sees fortunes fall steeply," dated January
	20, 2024 (publicly available at https://www.nola.com/news/politics/rep-garret-graves-
RI-55	sees-fortunes-fall-steeply/article_c4592922-b721-11ee-bba8-c3fe4cd6a7ad.html)
	Fox8live.com article entitled "Clock ticking after federal court orders redrawn Louisiana
	congressional map," dated November 14, 2023 (publicly available at
DI 56	https://www.fox8live.com/2023/11/14/clock-ticking-after-federal-court-orders-redrawn-
RI-56	louisiana-congressional-map/)

Exhibit No.	Description
110.	Lailluminator.com article entitled "Both parties push for Louisianas second majority-
	Black congressional district," dated January 15, 2024 (publicly available at
	https://lailluminator.com/2024/01/15/both-parties-push-for-louisianas-second-majority-
RI-57	black-congressional-district/)
	Lailluminator.com article entitled "Federal court rejects Louisiana congressional map,"
	dated June 6, 2022 (publicly available at https://lailluminator.com/2022/06/06/federal-
RI-58	court-rejects-louisiana-congressional-map/)
	Lailluminator.com article entitled "Graves to lose US House seat under Louisiana
	redistricting plan that adds minority seat," dated January 19, 2024 (publicly available at
	https://lailluminator.com/2024/01/19/graves-to-lose-u-s-house-seat-under-louisiana-
	redistricting-plan-that-adds-minority-seat/#:~:text=Louisiana%20lawmakers%20gave%20final%20approval,a%20Republican
RI-59	%20from%20Baton%20Rouge.)
ICI 37	Nola.com article entitled "Federal court to decide if Louisianas new congressional map
	with second Black district is legal," dated March 15, 2024 (publicly available at
	https://www.nola.com/news/court-to-decide-legality-of-louisianas-congressional-
RI-60	maps/article 605a4634-e2b1-11ee-a916-1b9f9a6b6874.html)
	Wafb.com article entitled "Congressman Graves claims Governor Landry intentionally
	targeted his district," dated March 18, 2024 (publicly available at
	https://www.wafb.com/2024/03/18/congressinan-graves-claims-governor-landry-
RI-61	intentionally-targeted-his-district/)
	Washington Examiner article entitled How GOP politics played a hand in Louisianas
	high-profile redistricting fight," dated January 25, 2024 (publicly available at
DI (2	https://www.washingtonexaminer.com/news/2818406/gop-politics-louisiana-high-
RI-62	profile-redistricting-fight/)  Widow some article artitled "Plat Sout State Sanata massident talks redistricting" details
	Wdsu.com article entitled 'Hot Seat State Senate president talks redistricting," dated January 15, 2024 (publicly available at https://www.wdsu.com/article/hot-seat-state-
RI-63	senate-president-talks-redistricting/46398271)
103	Nola.com article entitled 'I know what was being said' Steve Scalise suggests Garret
	Graves undercut speaker bid," dated December 1, 2023 (publicly available at
	https://www.nola.com/news/politics/i-know-what-was-being-said-steve-scalise-suggests-
	garret-graves-undercut-speaker-bid/article c8fb3590-905e-11ee-86ce-
RI-64	4319bdb3475d.html)
	Nola.com article entitled 'Lying and Misleading the American People' Garret Graves
	says GOP Must Tune Out Extremists," dated February 12, 2024 (publicly available at
	https://www.nola.com/news/politics/garret-graves-says-lies-kept-house-gop-majority-
RI-65	from-wins/article 8b707aca-c7b1-11ee-889b-2b4d82b01780.html)
DICC	Louisiana Legislature new release entitled "1ST SPECIAL SESSION OF 2024
RI-66	CONVENES," dated January 15, 2024
RI-67	Session Information for the 2024 First Extraordinary Session - Louisiana Legislature

Exhibit	Description
No.	
	Lailluminator.com article entitled "5th Circuit denies Louisiana's appeal in congressional
	redistricting case," dated December 15, 2023 (publicly available at
	https://lailluminator.com/2023/12/15/5th-circuit-denies-louisianas-appeal-in-
	congressional-redistricting-
DI (0	case/#:~:text=In%20Louisiana's%20congressional%20redistricting%20case,aspects%20
RI-68	of%20the%20Robinson%20v.)
RI-69	Bill Info - SB8 (2024 First Extraordinary Session)
	The Center for Politics article entitled "The Fields Above the Graves - Louisiana 2024
	Redistricting," dated January 25, 2024 (publicly available at https://centerforpolitics.org/crystalball/the-fields-above-the-graves-louisiana-2024-
	redistricting/#:~:text=Jeff%20Landry%20(R%2DLA),2020%20and%20is%20Safe%20D
RI-70	emocratic.)
10 /0	Nola.com article entitled "Redistricting cases could again upend Louisianas political
	landscape," dated February 15, 2024 (publicly available at
	https://www.nola.com/gambit/news/clancy_dubos/clancy-dubos-redistricting-cases-
	could-again-upend-louisiana-s-political-landscape/article_1e5accc2-cc2c-11ee-8702-
	eb3de0498e43.html#:~:text=It's%20a%20long%20shot%20right,Louisiana's%20politica
RI-71	1%20landscape%20once%20more.)
	Lailluminator.com article entitled "Congressional map with Gov. Jeff Landry's backing
	clears Louisiana Senate," dated January 17, 2024 (publicly available at
DI 72	https://lailluminator.com/2024/01/17/congressional-map-with-gov-jeff-landrys-backing-
RI-72	clears-louisiana-senate/)  Ell E Nove he POLITICO article artifled "Courat Crosses defeart as state layers by
	<i>E&amp;E News by POLITICO</i> article entitled "Garret Graves defiant as state lawmakers cut up his district," dated January 19, 2024 (publicly available at
	https://www.eenews.net/articles/garret-graves-defiant-as-state-lawmakers-cut-up-his-
RI-73	district/)
RI-74	Biography – U.S. Congressman Garret Graves
	Nola.com article entitled "GOP plan to force out Rep. Garret Graves befuddles U.S.
	House Republicans," dated January 21, 2024 (publicly available
	https://www.nola.com/news/politics/new-garret-graves-district-befuddles-us-house-
RI-75	republicans/article_2d2543fc-b6f8-11ee-9b1c-eba690a9b7f7.html)
	Office of Governor Jeff Landry Gov. Jeff Landry's First Special Session Concludes,"
DI 50	dated January 19, 2024 (publicly available at https://gov.louisiana.gov/news/gov-jeff-
RI-76	landrys-first-special-session-concludes)
	Office of Governor Jeff Landry "Governor Jeff Landry Assumes Office," dated January
DI 77	8, 2024 (publicly available at https://gov.louisiana.gov/news/governor-jeff-landry-
RI-77	assumes-office)  Office of Governor Jeff Landry "Governor Jeff Landry Opens First Special Session on
	Court Ordered Redistricting," dated January 16, 2024 (publicly available at
	https://gov.louisiana.gov/news/governor-jeff-landry-opens-first-special-session-on-court-
	ordered-
	redistricting#:~:text=Baton%20Rouge%2C%20La%20%2D%20Today%2C,make%20ot
RI-78	her%20election%2Drelated%20changes.)

Exhibit	Description
No.	
	Lailluminator.com article entitled "Graves to lose U.S. House seat under Louisiana
	redistricting plan that adds minority seat," dated January 19, 2024 (publicly available at
	https://lailluminator.com/2024/01/19/graves-to-lose-u-s-house-seat-under-louisiana-
	redistricting-plan-that-adds-minority-
DI 70	seat/#:~:text=Louisiana%20lawmakers%20gave%20final%20approval,a%20Republican
RI-79	%20from%20Baton%20Rouge.)
	POLITICO article entitled "How Life is Going for This Former McCarthy Deputy Not
RI-80	Great," dated January 25, 2024 (publicly available at
K1-60	https://www.politico.com/news/2024/01/25/mccarthy-deputy-louisiana-gop-00136428)  Shreveport Times article entitled, "Speaker Mike Johnson urges Louisiana to ignore court
	order to create black district." dated January 17, 2024 (publicly available at:
	https://www.shreveporttimes.com/story/news/2024/01/17/speaker-mike-johnson-says-
	louisiana-map-to-create-black-district-threatens-republican-house-
RI-81	majority/72253666007/)
	Lailluminator.com article entitled, "Congressional map with Gov. Jeff Landry's backing
	clears Louisiana senate." dated January 17, 2024 (publicly available at:
	https://lailluminator.com/2024/01/17/congressional-map-with-gov-jeff-landrys-backing-
RI-82	clears-louisiana-senate)
	Lailluminator.com article entitled, "In governor's race, we'll see if 'Wags' can tail top
	dog Landry." dated March 8, 2023 (publicly available at:
	https://lailluminator.com/2023/03/08/in-governors-race-well-see-if-wags-can-tail-top-
RI-83	dog-landry)
	Shreveport Times article entitled, "Julia Letlow emphasizes her reelection bid in
	Louisiana's new congressional boundaries." dated January 22, 2024 (publicly available
DI 04	at: https://www.shreveporttimes.com/story/news/2024/01/22/julia-letlow-emphasizes-
RI-84	reelection-bid-in-new-louisiana-fifth-congressional-district-map/72309482007)
RI-85	Hotline article entitled, "Louisiana congressional map passes state Senate." dated January 18, 2024
K1-63	The Center Square article entitled, "Louisiana House committee approves redistricting
	bill, rejects another." dated January 17, 2024 (publicly available at
	https://www.thecentersquare.com/louisiana/article_46371c8c-b570-11ee-bb19-
RI-86	93dddd4e327b.html)
	Nola.com article entitled, "Louisiana lawmakers approve congressional map, adding new
	majority black district." dated January 19, 2024 (publicly available at:
	https://www.nola.com/news/politics/louisiana-lawmakers-just-approved-a-new-
RI-87	congressional-map/article_42818490-b702-11ee-94ec-0bf0693537a1.html
	The Advocate article entitled, "Louisiana Legislature sends congressional map with one
	majority-Black district to governor's desk." dated February 18, 2022 (publicly available
	at https://www.theadvocate.com/baton_rouge/news/politics/legislature/louisiana-
DI CC	legislature-sends-congressional-map-with-one-majority-black-district-to-governors-
RI-88	desk/article_dd507448-90e1-11ec-bc5d-1faf116428b4.html)
DIOO	Hotline article entitled, "Louisiana map proposal guts Graves' seat." dated January 16,
RI-89	2024

Exhibit	Description
No.	
77.00	Franklin Banner-Tribune article entitled, "Louisiana Voters Disturbed by Legislative
RI-90	Antics." dated January 31, 2024
DI 01	National Journal Hotline article entitled, "Louisiana Govelect Jeff Landry could punish
RI-91	rival Graves in redistricting case," dated Nov. 6, 2023, 2023 WLNR 38152091.
	Louisiana GOP press update entitled, "Unity Is Our Only Path to Victory." dated January
RI-92	16, 2023 (publicly available at https://www.lagop.com/post/unity-is-our-only-path-to-
RI-92	victory) 118th Congress – House Committee on Appropriations – Republican Membership
K1-93	Denver Gazette article entitled, "Musical chairs – Five House Republicans who have
	seen their seats shift in last six months – and how it could cost GOP." dated January 30,
RI-94	2024
ПСТ	The Acadiana Advocate article entitled, "McCarthy: Debt ceiling deal possible." dated
RI-95	May 17, 2023
	The Advocate article entitled, "GOP endorsement in governor's race stirs controversy."
	dated January 17, 2023 (publicly available at
	https://www.theadvocate.com/baton_rouge/news/politics/elections/gop-gets-more-ire-
	over-endorsement-possible-graves-run/article_ab85'ba00-96b1-11ed-bfef-
RI-96	e35871ed67e7.html)
	Nola.com article entitled, "Garret Graves endorses Stephen Waguespack in Louisiana
	governor's race." dated June 7, 2023 (publicly available at
DI 07	https://www.nola.com/news/politics/garret-graves-endorses-stephen-waguespack-in-
RI-97	governors-race/article_fa443074-0559-11ee-af08-27e4fcb098fe.html)
RI-98	"Our District" page on Garret Graves Congressional page (publicly available at
K1-96	https://garretgraves.house.gov/about/our-district.htm)  Nola.com article entitled, "Republicans taking cues from Jeff Landry in special session,
	with flashes of dissent" dated January 17, 2024 (publicly available at
	https://www.nola.com/news/politics/legislature/republicans-take-cues-from-jeff-landry-
RI-99	with-some-dissent/article 3decfa8a-b58c-11ee-9af6-9b3a5cb28cd7.html)
	Shreveport Times article entitled, "Speaker Mike Johnson urges Louisiana to ignore court
	order to create black district." dated January 17, 2024 (publicly available at:
	https://www.shreveporttimes.com/story/news/2024/01/17/speaker-mike-johnson-says-
	louisiana-map-to-create-black-district-threatens-republican-house-
RI-100	majority/72253666007/)
	Nola.com article entitled, "Stephen Waguespack, candidate for governor, is selling fiscal
	conservatism. Are voters buying?" dated August 21, 2023 (publicly available at
D. 101	https://www.nola.com/news/politics/elections/stephen-waguespack-touts-economic-
RI-101	policy-in-governors-race/article fa095ce0-3e04-11ee-8fcd-17d068c4dcb7.html)
	Louisiana Illuminator article entitled, "Supreme Court Ruling in Louisiana Redistricting
RI-102	Case Creates Uncertainty" dated October 21, 2023 (publicly available at https://lailluminator.com/2023/10/21/louisiana-redistricting/)
111102	Associated Press article entitled "Supreme Court unfreezes Louisiana redistricting case
	that could boost Black voting power before 2024," dated June 26, 2023 (publicly
	available at https://apnews.com/article/supreme-court-redistricting-louisiana-race-voting-
RI-103	rights-168774be5a995c6c34225b666ad81851)

Exhibit	Description
No.	•
RI-104	U.S. Census Bureau Quick Facts - Louisiana
	Lailluminator.com article entitled "Voters sue over creation of Louisiana's second
	majority-Black congressional district," dated February 1, 2024 (publicly available at
	https://lailluminator.com/2024/02/01/voters-sue-over-creation-of-louisianas-second-
	majority-black-congressional-
RI-105	district/#:~:text=A%20group%20of%20non%2DBlack,the%20direction%20of%20Republican%20Gov.)
K1-103	Nola.com article entitled "Garret Graves takes a lead on high-stakes debt talks," dated
	April 24, 2023 (publicly available at https://www.nola.com/news/politics/garret-graves-
	takes-a-lead-in-debt-ceiling-negotiations/article a2e562d2-e2c5-11ed-a026-
	eb5e83bd7de2.html#:~:text=WASHINGTON%20%E2%80%93%20Baton%20Rouge%2
RI-106	0Congressman%20Garret,for%20raising%20the%20debt%20ceiling.)
	Associated Press article entitled "Judge denies extension for Louisiana redistricting
	deadline," dated June 16, 2022 (publicly available at https://apnews.com/article/voting-
	rights-john-bel-edwards-louisiana-government-and-politics-congress-
RI-107	14760c94d7d4acb7ec3f66d7e6407322)
	Nola.com article entitled "Louisiana Lawmakers Approve Congressional Map, Adding
	New Majority-Black district," dated January 19, 2024 (publicly available at
	https://www.nola.com/news/politics/louisiana-lawmakers-just-approved-a-new-
RI-108	congressional-map/article 42818490-b702-11ee-94ec-0bf0693537a1.html)
DI 100	CQ Researcher article entitled "Redistricting Battles," (available at
RI-109	https://doi.org/10.4135/cqresrre20220304)
	Shreveport Times article entitled "Speaker Mike Johnson urges Louisiana to ignore court order to create Black district," dated January 17, 2024 (publicly available at
	https://www.shreveporttimes.com/story/news/2024/01/17/speaker-mike-johnson-says-
	louisiana-map-to-create-black-district-threatens-republican-house-
RI-110	majority/72253666007/)
1110	Lailluminator.com article entitled "What does the Supreme Court's Alabama
	redistricting decision mean for Louisiana," dated June 8, 2023 (publicly available at
	https://lailluminator.com/2023/06/08/what-does-the-supreme-courts-alabama-
	redistricting-decision-mean-for-
	louisiana/#:~:text=In%20a%20statement%20Thursday%2C%20Edwards,six%20districts
RI-111	
DI 112	
K1-112	
RI-113	<u> </u>
RI-114	Expert Report of Dr. Lisa Handley in <i>Robinson</i> v. <i>Ardoin</i> , dated April 14, 2022 (PR-12)
RI-111 RI-112 RI-113 RI-114	%20are%20majority%20Black.%E2%80%9D)  The Advocate article entitled "Louisiana Legislature sends congressional map with one majority-Black district to governor's desk," dated February 22, 2022 (publicly available at https://www.theadvocate.com/baton_rouge/news/politics/legislature/louisiana-legislature-sends-congressional-map-with-one-majority-black-district-to-governors-desk/article_dd507448-90e1-11ec-bc5d-1faf116428b4.html)  Nola.com article entitled "Want to Move to a Rural Area For 85,000 La. Residents, it Happened Without Them Doing a Thing," dated January 10, 2023 (publicly available at https://www.nola.com/news/data/rural-louisiana-gains-85000-residents-due-to-census-tweak/article_49e65a2a-8d24-11ed-b82d-dbf162c9d716.html)

Exhibit No.	Description
RI-115	Expert Report of Dr. Blakeslee Gilpin in <i>Robinson</i> v. <i>Ardoin</i> , dated April 14, 2022 (PR-13)
RI-116	Expert Report of Dr. Traci Burch in <i>Robinson</i> v. <i>Ardoin</i> , dated April 14, 2022 (PR-14)
RI-117	Expert Report of Anthony Fairfax in <i>Robinson</i> v. <i>Ardoin</i> , dated April 14, 2022 (PR-15)
	Supplemental Expert Report of Anthony Fairfax in Robinson v. Ardoin, dated May 2,
RI-118	2022 (PR-86)
	Supplemental Expert Report of Dr. Lisa Handley in Robinson v. Ardoin, dated May 2,
RI-119	2022 (PR-87)
RI-120	Supplemental Expert Report of Dr. Blakeslee Gilpin in <i>Robinson</i> v. <i>Ardoin</i> , dated May 2, 2022 (PR-88)
RI-121	Supplemental Expert Report of Dr. Traci Burch in <i>Robinson</i> v. <i>Ardoin</i> , dated May 2, 2022 (PR-89)
RI-122	Second Supplemental Expert Report of Anthony Fairfax in <i>Robinson</i> v. <i>Ardoin</i> , dated May 6, 2022 (PR-90)
RI-123	Second Supplemental Expert Report of Dr. Lisa Handley in <i>Robinson</i> v. <i>Ardoin</i> , dated May 6, 2022 (PR-91)
	Corrected Expert Report of Dr. Lisa Handley in <i>Robinson</i> v. <i>Ardoin</i> , dated May 9, 2022
RI-124	(PR-92)
RI-125	Robinson v. Ardoin P.I. Hearing Transcript, May 9, 2022
RI-126	Robinson v. Ardoin P.I. Hearing Transcript, May 10, 2022
RI-127	H.B. 1, 1st Spec. Sess. (La. 2022)
RI-128	S.B. 5, 1st Spec. Sess. (La. 2022)
RI-129	H.B. 4, 1st Spec. Sess. (La. 2022)
RI-130	H.B. 5, 1st Spec. Sess. (La. 2022)
RI-131	H.B. 7, 1st Spec. Sess. (La 2022)
RI-132	H.B. 8, 1st Spec. Sess. (La. 2022)
RI-133	H.B. 9, 1st Spec. Sess (La. 2022)
RI-134	H.B. 12, 1st Spec Sess. (La. 2022)
RI-135	S.B. 2, 1st Spec. Sess. (La. 2022)
RI-136	S.B. 4, 1st Spec. Sess. (La. 2022)
RI-137	S.B. 6, 1st Spec. Sess. (La. 2022)
RI-138	S.B. 9, 1st Spec. Sess. (La. 2022)
RI-139	S.B. 10, 1st Spec. Sess. (La. 2022)
RI-140	S.B. 11, 1st Spec. Sess. (La. 2022)
RI-141	S.B. 16, 1st Spec. Sess. (La. 2022)
RI-142	S.B. 18, 1st Spec. Sess. (La. 2022)
RI-143	Amendment #88 to H.B. 1, 1st Spec. Sess. (La. 2022)
RI-144	Amendment #88 to H.B. 1, 1st Spec. Sess. (La. 2022) - Vote Sheet
RI-145	Amendment #99 to H.B. 1, 1st Spec. Sess. (La. 2022)
RI-146	Amendment #153 to H.B. 1, 1st Spec. Sess. (La. 2022)
RI-147	Amendment #62 to S.B. 2, 1st Spec. Sess. (La. 2022)
RI-148	Amendment #116 to S.B. 5, 1st Spec. Sess. (La. 2022)
RI-149	Amendment #91 to S.B. 5, 1st Spec. Sess. (La. 2022)

Exhibit	Description
<b>No.</b> RI-150	Amondment #01 to S.P. 5 Let Spee Sees (Le 2022) Vote Sheet
RI-150	Amendment #91 to S.B. 5, 1st Spec. Sess. (La. 2022) - Vote Sheet  Monroe Roadshow transcript, dated October 20, 2021
RI-151	Shreveport Roadshow transcript, dated October 21, 2021
RI-152	
RI-153	Lafayette Roadshow transcript, dated October 26, 2021 Alexandra Roadshow transcript, dated November 9, 2021
RI-154	
RI-155	Baton Rouge Roadshow transcript, dated November 16, 2021
RI-150	Covington Roadshow transcript, dated November 30, 2021
RI-157	Lake Charles Roadshow transcript, dated December 15, 2021  New Orleans Roadshow transcript, dated January 5, 2022
RI-158	
RI-159	Thibodaux Roadshow transcript, dated January 11, 2022  Joint Governmental Affairs Committee Hearing transcript, dated January 20, 2022
RI-161	
RI-161	Special Session HGA Committee Transcript, dated May 26, 2021 Special Session SGA Committee Transcript, dated June 2, 2021 Part 1
RI-163	Special Session SGA Committee Transcript, dated June 2, 2021 Part 2
RI-163	Special Session JGA Committee Transcript, dated Suprember 17, 2021
RI-165	Special Session SGA Committee Transcript, dated February 2, 2022
RI-166	Special Session SGA Committee Transcript, dated February 3, 2022 Part 1
RI-167	Special Session SGA Committee Transcript, dated February 3, 2022 Part 2
RI-168	Special Session SGA Committee Transcript, dated February 3, 2022 Part 3
RI-169	Special Session HGA Committee Transcript, dated February 4, 2022
RI-170	Special Session SGA Committee Transcript, dated February 4, 2022
RI-171	Special Session HGA Committee Transcript, dated February 7, 2022
RI-172	Special Session SGA Committee Transcript, dated February 7, 2022
RI-173	Special Session HGA Committee Transcript, dated February 8, 2022
RI-174	Special Session SGA Committee Transcript, dated February 8, 2022
RI-175	Special Session HGA Committee Transcript, dated February 9, 2022
RI-176	Special Session SGA Committee Transcript, dated February 9, 2022
RI-177	Special Session HGA Committee Transcript, dated February 10, 2022
RI-178	Special Session HGA Committee Transcript, dated February 11, 2022
RI-179	Special Session HGA Committee Transcript, dated February 14, 2022
RI-180	Special Session SGA Committee Transcript, dated February 14, 2022
RI-181	Special Session HGA Committee Transcript, dated February 15, 2022
RI-182	Special Session SGA Committee Transcript, dated February 15, 2022
RI-183	Special Session HGA Committee Transcript, dated February 16, 2022
RI-184	Special Session Senate Full Floor Debate, dated February 8, 2022
RI-185	Special Session House Full Floor Debate, dated February 10, 2022
RI-186	Special Session Senate Full Floor Debate, dated February 17, 2022
RI-187	Special Session House Full Floor Debate, dated February 18, 2022 Part 1
RI-188	Special Session House Full Floor Debate, dated February 18, 2022 Part 2
RI-189	Special Session Senate Full Floor Debate, dated February 18, 2022 Part 1
RI-190	Special Session Senate Full Floor Debate, dated February 18, 2022 Part 2
RI-191	Special Session Senate Full Floor Debate, dated February 18, 2022 Part 3

Exhibit No.	Description
1100	Letter to the Louisiana State and Governmental Affairs Committee from Michael
	Pernick, et al., dated December 14, 2021 (publicly available at:
	https://www.naacpldf.org/wp-content/uploads/2021.12.14-Louisiana-Congressional-
RI-192	Redistricting-Advocacy-Follow-Up-Letter.pdf)
	Letter to Clay J. Schexnayder, Speaker of the Louisiana House of Representatives, from
	Governor John Bel Edwards, dated March 9, 2022 (publicly available at:
RI-193	https://gov.louisiana.gov/assets/docs/Letters/SchexnayderLtr20220309VetoHB1.pdf)
RI-194	Amendment #88 to H.B. 1, 1st Spec. Sess. (La. 2022) - Vote Sheet
RI-195	Amendment #91 to S.B. 5, 1st Spec. Sess. (La. 2022) - Vote Sheet
RI-196	H.B. 608, Reg. Sess. (La. 2022)
RI-197	H.B. 712, Reg. Sess. (La. 2022)
RI-198	H.B. 823, Reg. Sess. (La. 2022)
RI-199 RI-200	H.B. 1, 2nd Spec. Sess. (La. 2022) - Vote Sheet
RI-200	H.B. 1, 2nd Spec. Sess. (La. 2022) H.B. 2, 2nd Spec. Sess. (La. 2022) - Vote Sheet
RI-201	H.B. 2, 2nd Spec. Sess. (La. 2022) - Vote Sheet
RI-202	H.B. 3, 2nd Spec. Sess. (La. 2022) - Vote Sheet
RI-203	H.B. 3, 2nd Spec. Sess. (La. 2022) - Vote Sheet
RI-205	H.B. 4, 2nd Spec. Sess. (La. 2022)
RI-206	S.B. 1, 2nd Spec. Sess. (La. 2022) - Vote Sheet Reconsider
RI-207	S.B. 1, 2nd Spec. Sess. (La. 2022) - Vote Sheet Report from Committee Without Action
RI-208	S.B. 1, 2nd Spec. Sess. (La. 2022)
RI-209	S.B. 2, 2nd Spec. Sess. (La. 2022) - Vote Sheet Refer
RI-210	S.B. 2, 2nd Spec. Sess. (La. 2022) - Vote Sheet Suspend the Rules
RI-211	S.B. 2, 2nd Spec. Sess. (La. 2022)
RI-212	S.B. 3, 2nd Spec. Sess. (Lz. 2022) - Engrossed
RI-213	S.B. 3, 2nd Spec. Sess (La. 2022) - Original
RI-214	Amendment #17 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-215	Amendment #19 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-216	Amendment #20 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-217	Amendment #21 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-218	Amendment #22 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-219	Amendment #23 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-220	Amendment #25 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-221	Amendment #26 to S.B. 3, 2nd Spec. Sess. (La. 2022)
RI-222	Monroe Roadshow Video, dated October 20, 2021
RI-223	Shreveport Roadshow Video, dated October 21, 2021
RI-224	Lafayette Roadshow Video, dated October 26, 2021
RI-225	Alexandra Roadshow Video, dated November 9, 2021
RI-226	Baton Rouge Roadshow Video, dated November 16, 2021
RI-227	Covington Roadshow Video, dated November 30, 2021
RI-228	Lake Charles Roadshow Video, dated December 15, 2021
RI-229	New Orleans Roadshow Video, dated January 5, 2022

Exhibit	Description
No.	
RI-230	Thibodaux Roadshow Video, dated January 11, 2022
RI-231	Joint Governmental Affairs Committee Hearing Video, dated January 20, 2022
RI-232	Special Session HGA Committee Video, dated May 26, 2021
RI-233	Special Session SGA Committee Video, dated June 2, 2021 Part 1
RI-234	Special Session SGA Committee Video, dated June 2, 2021 Part 2
RI-235	Special Session JGA Committee Video, dated September 17, 2021
RI-236	Special Session SGA Committee Video, dated February 2, 2022
RI-237	Special Session SGA Committee Video, dated February 3, 2022 Part 1
RI-238	Special Session SGA Committee Video, dated February 3, 2022 Part 2
RI-239	Special Session SGA Committee Video, dated February 3, 2022 Part 3
RI-240	Special Session HGA Committee Video, dated February 4, 2022
RI-241	Special Session SGA Committee Video, dated February 4, 2022
RI-242	Special Session HGA Committee Video, dated February 7, 2022
RI-243	Special Session SGA Committee Video, dated February 7, 2022
RI-244	Special Session HGA Committee Video, dated February 8, 2022
RI-245	Special Session SGA Committee Video, dated February 8, 2022
RI-246	Special Session HGA Committee Video, dated February 9, 2022
RI-247	Special Session SGA Committee Video, dated February 9, 2022
RI-248	Special Session HGA Committee Video, dated February 10, 2022
RI-249	Special Session HGA Committee Video, dated February 11, 2022
RI-250	Special Session HGA Committee Video, dated February 14, 2022
RI-251	Special Session SGA Committee Video, dated February 14, 2022
RI-252	Special Session HGA Committee Video, dated February 15, 2022
RI-253	Special Session SGA Committee Video, dated February 15, 2022
RI-254	Special Session HGA Committee Video, dated February 16, 2022
RI-255	Special Session Senate Full Floor Debate Video, dated February 8, 2022
RI-256	Special Session House Full Floor Debate Video, dated February 10, 2022
RI-257	Special Session Senate Full Floor Debate Video, dated February 17, 2022
RI-258	Special Session House Full Floor Debate Video, dated February 18, 2022 Part 1
RI-259	Special Session House Full Floor Debate Video, dated February 18, 2022 Part 2
RI-260	Special Session Senate Full Floor Debate Video, dated February 18, 2022 Part 1
RI-261	Special Session Senate Full Floor Debate Video, dated February 18, 2022 Part 2
RI-262	Special Session Senate Full Floor Debate Video, dated February 18, 2022 Part 3
RI-263	January 15, 2024 - Baton Rouge, LA (H&G House) Redistricting 2024 Powerpoint
	Written Testimony (Redistricting) from Billy Anderson (submitted for January 15, 2024
RI-264	HGA meeting)
	Written Testimony from Deldeirdra on Senate Bill 4 (submitted for January 16, 2024
RI-265	SGA meeting)
DIAGG	Written Testimony from Gloria on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-266	meeting)
DI 267	Written Testimony from Leslie on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-267	meeting)

Exhibit	Description
No.	1
	Written Testimony from Margaret on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-268	meeting)
	Written Testimony from Reginald on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-269	meeting)
	Written Testimony from Shandrell on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-270	meeting)
	Written Testimony from Sharon 2 on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-271	meeting)
DI 070	Written Testimony from Sharon 3 on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-272	meeting)
RI-273	Written Testimony from Sharon on Senate Bill 4 (submitted for January 16, 2024 SGA
	meeting)
DI 274	Written Testimony from Shelita on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-274	meeting)  Handout from ACLU and others on Seneta Bill 4 (submitted for January 16, 2024 SCA)
RI-275	Handout from ACLU and others on Senate Bill 4 (submitted for January 16, 2024 SGA meeting)
K1-2/3	Letter from Legal Defense Fund on Senate Bill 4 (submitted for January 16, 2024 SGA
RI-276	meeting)
101-270	Letter from Ronnie Evans on Senate Bill 8 (submitted for January 16, 2024 SGA
RI-277	meeting)
101 277	Written Testimony (House Bill 5) - Victoria Wenger (submitted for January 17, 2024
RI-278	HGA meeting)
10 270	Written Testimony (House Bill 5) - Terry Landry, Jr. (submitted for January 17, 2024
RI-279	HGA meeting)
	Written Testimony (House Bill 5) - Rhania Written (submitted for January 17, 2024
RI-280	HGA meeting)
	Written Testimony (House Bill 5) - Caroline Sinders (submitted for January 17, 2024
RI-281	HGA meeting)
	Written Testimony (Redistricting) - Caroline (submitted for January 17, 2024 HGA
RI-282	meeting)
	Written Testimony (Redistricting) - Brooke (submitted for January 17, 2024 HGA
RI-283	meeting)
	Written Testimony from Congressman Troy Carter (submitted for January 18, 2024 SGA
RI-284	meeting)
RI-285	Written Testimony Senate Bill 4 Wayne (submitted for January 18, 2024 SGA meeting)
	Written Testimony (Redistricting) - Jodie (submitted for January 18, 2024 HGA
RI-286	meeting)
RI-287	Written Testimony (Redistricting) - Peter (submitted for January 18, 2024 HGA meeting)
D. 200	Written Testimony (Redistricting) - Victor M. Jones, Esq. (submitted for January 18,
RI-288	2024 HGA meeting)
DI 200	Written Testimony (Redistricting) - Betty (submitted for January 18, 2024 HGA
RI-289	meeting)
RI-290	H.B. 1, Veto Sess. (La. 2022) - Vote Sheet
RI-291	H.B. 1 (Enrolled), 1st Spec. Sess. (La. 2022)

Exhibit	Description
No.	
RI-292	Kishbaugh v. City of Lafayette Government, 275 So.3d 471 (La. App. 2019)
RI-293	Robinson Intervenors' Legislative Transcript Designations

RETAILUED FROM DEMOCRACYDOCKET, COM RETAIN REPORT OF THE PROPERTY OF THE PROPE

### WITNESS LIST

The *Robinson* Intervenors expect the following witnesses to testify at the consolidated hearing and reserve the right to call witnesses listed by any other party to this action. The *Robinson* Intervenors also reserve the right to call additional witnesses based on the other parties' submissions in connection with consolidated hearing, any undisclosed witnesses that any other party attempts to call, any previously withdrawn witness that any other party attempts to call, or otherwise in rebuttal.

Witness	
Anthony Fairfax (will call)	
Comm'r Davante Lewis (will call)	
Michael Martin (will call)	
Cory McCartan (will call)	
Ashley Shelton (will call)	
Rep. Mandie Landry (may call)	
Rep. Cedric Glover (may call)	
Sen. Royce Duplessis (may call)	
Omari Ho-Sang (may call)	
Steven Harris (may call)	

DATED: April 9, 2024

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<sup>\*\*</sup>Practice is limited to federal court.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which provides electronic notice of filing to all counsel of record, on this 9th day of April, 2024.

By: /s/ John Adcock

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