Nos. 24-109, 24-110

IN THE

Supreme Court of the United States

STATE OF LOUISIANA,
Appellant,
v.
PHILLIP CALLAIS, *et al.*,
Appellees.

PRESS ROBINSON, *et al.*,
Appellants,
v.
PHILLIP CALLAIS, *et al.*,
Appellees.

On Appeal from the United States District Court for the Western District of Louisiana

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BRIEF FOR LOUISIANA HISTORIANS AS *AMICI CURIAE* SUPPORTING APPELLANTS

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TABLE OF AUTHORITIES

CASES Page(s)

Bush v. Vera,
517 U.S. 952 (1996)..... 1, 2

LULAC v. Perry,
548 U.S. 399 (2006)..... 2

Miller v. Johnson,
515 U.S. 900 (1995)..... 2

Pigford v. Glickman,
185 F.R.D. 82 (D.D.C. 1999) *aff'd*,
206 F.3d 1212 (D.C. Cir. 2000)..... 33

Slaughter-House Cases,
83 U.S. (16 Wall.) 36 (1873)..... 16

STATUTES

Voting Rights Act, § 2, 52 U.S.C. § 10301 ... 1

La. Acts 2024, 1st Ex. Sess., Act No. 2 (SB8)..... 1, 4

Act No. 236, passed 17 July 1924, in ACTS PASSED BY THE LEGISLATURE OF THE STATE OF LOUISIANA AT THE REGULAR SESSION BEGUN AND HELD IN THE CITY OF BATON ROUGE ON THE TWELFTH DAY OF MAY, 1924 (1924)..... 26

OTHER AUTHORITIES

6 to Represent Red River Presbytery at General Assembly, SHREVEPORT JOURNAL (Shreveport, La.), May 24, 1952..... 14

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Alexandria Louisiana Railroads, ALEXANDRIA, https://www.alexandria-louisiana.com/alexandria-louisiana-railroads.htm 26

Am. Ass'n of State Highway and Transp. Officials, *Route Numbering Committee Agenda 1976-07-13*, *WIKISOURCE,* https://en.wikisource.org/wiki/Route_Numbering_Co mmittee_Agenda_1976-07-13 27

C. Geoffrey Mangin, *Clearing the Great Raft: Impetus for Economic Growth in Louisiana's Red River Valley, 1830-1860*, 31 N. LA. HIST. 32 (2000) 7

Campbell Gibson & Kay Jung, *Historical Census Statistics On Population Totals By Race, 1790 to 1990, and By Hispanic Origin, 1970 to 1990, For Large Cities And Other Urban Places In The United States* (U.S. Census Bureau Population Div., Working Paper No. 76, 2005)..... 19, 20

Carin Peller-Semmens, *Unreconstructed: slavery and emancipation on Louisiana's Red River, 1820-1880* (Univ. of Sussex, Doctoral Dissertation, American Studies, 2016)..... 9, 10

Carl L. Bankston III & Jacques Henry, *Spectacles of Ethnicity: Festivals and the Commodification of Ethnic Culture among Louisiana Cajuns,* 20 SOCIO. SPECTRUM 377 (2000)..... 3

Carl Newton Tyson, THE RED RIVER IN THE SOUTHWESTERN HISTORY (1981) 8

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Carleton Washburne, LOUISIANA LOOKS AT ITS SCHOOLS: A SUMMARY REPORT OF THE LOUISIANA EDUCATIONAL SURVEY COMMISSION (1942) 33

Carole Marks, *FAREWELL—WE'RE GOOD AND GONE: THE GREAT BLACK MIGRATION* (1989)..... 18

Casson Surname Distribution Map, FOREBEARS, https://forebears.io/surnames/casson..... 24

Cloutier Surname Distribution Map, FOREBEARS, https://forebears.io/surnames/cloutier..... 25

DAILY PICAYUNE (New Orleans, La.), Aug. 21, 1874 14

DAILY PICAYUNE (New Orleans, La.), May 25, 1883 14

David P. Russ, *The Quaternary Geomorphology of the Lower Red River Valley, Louisiana.* (Penn. State Univ. Doctoral Dissertation, 1975) 6-7

David C. Weindorf, *An Update of the Field Guide to Louisiana Soil Classification (Bulletin No. 889)*, LA. STATE UNIV. AGCENTER BULLETINS (2008)..... 7

Edward Royce, *THE ORIGINS OF SOUTHERN SHARECROPPING* (1993) 17

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Emerson W. Gould, FIFTY YEARS ON THE MISSISSIPPI; OR, GOULD'S HISTORY OF RIVER NAVIGATION (1889) 13

Eric Foner, THE SECOND FOUNDING: HOW THE CIVIL WAR AND RECONSTRUCTION REMADE THE CONSTITUTION (2019)..... 15

Frederick Law Olmsted, A JOURNEY IN THE SEABOARD SLAVE STATES, WITH REMARKS ON THEIR ECONOMY (1856) 12

Friedrich Gërstacker, GËRSTACKER'S LOUISIANA: FICTION AND TRAVEL SKETCHES FROM ANTEBELLUM TIMES THROUGH RECONSTRUCTION (Irene di Maio trans., 2006)..... 9

Gavin Wright, *OLD SOUTH, NEW SOUTH: REVOLUTIONS IN THE SOUTHERN ECONOMY SINCE THE CIVIL WAR* (1986)..... 17

Geologic Map of Louisiana, U.S. GEOLOGICAL SURV. (Nov. 30, 2000), https://www.usgs.gov/media/images/geologic-map-louisiana. 5

George Brown Tindall, THE EMERGENCE OF THE NEW SOUTH, 1913–45 (1967)..... 20

Glenn Martel, *Early Days in Northwest Louisiana*, 12 AM. HIST. QUARTERLY 120–21 (1953)..... 7

Gwendolyn Midlo Hall, AFRICANS IN COLONIAL LOUISIANA: THE DEVELOPMENT OF AFRO-CREOLE CULTURE IN THE EIGHTEENTH CENTURY (1992)..... 3

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Henry Alexander Wiencek, *OIL CITIES: THE MAKING OF NORTH LOUISIANA'S BOOMTOWNS, 1901–1930* (2024)..... 19

Isabel Wilkerson, *THE WARMTH OF OTHER SUNS: THE EPIC STORY OF AMERICA'S GREAT MIGRATION* (2010)..... 18

J.R. Schultz & E.L. Krinitzsky, *Geology of the Lower Red River*, Technical Memorandum No. 3-319. (Vicksburg, Ms.: U.S. Army Engineer Waterways Experiment Station, 1950)..... 7

Jack Dillard, *Indicator Fall Is Upon Us, Heritage Harvest Tour Is Too*, SHREVEPORT TIMES (Shreveport, La.), Sept. 18, 2016... 29

James G. Hollandsworth, PORTRAIT OF A SCIENTIFIC RACIST: ALFRED HOLT STONE OF MISSISSIPPI (2008)..... 16

Janet Speyrer et al., Red River Development Commission, LOUISIANA, https://crt.state.la.us/Assets/documentarchive/impact-report/Red%20River.pdf..... 28

John C. Baker, FARM BROADCASTING: THE FIRST SIXTY YEARS (1981)..... 29

Joshua D. Rothman, THE LEDGER AND THE CHAIN: HOW DOMESTIC SLAVE TRADERS SHAPED AMERICA (2021)..... 10

Joubert Surname Distribution Map, FOREBEARS, https://forebears.io/surnames/joubert..... 23

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Justin T. Callais & Gonzalo Schwarz, *Social Mobility in the 50 States*, ARCHBRIDGE INSTITUTE (Dec. 18, 2023), https://www.archbridgeinstitute.org/social-mobility-in-the-50-states/ 34

La Tourrette's reference map of the state of Louisiana, LIBRARY OF CONGRESS, https://www.loc.gov/item/2006629760/ 11

LeeAnna Keith, THE COLFAX MASSACRE: THE UNTOLD STORY OF BLACK POWER, WHITE TERROR, AND THE DEATH OF RECONSTRUCTION (2008) 15

Letter from D.B. Allen (Nov. 13, 1851)..... 9

Louisiana Education: At Least Bachelor's Degree, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih 32

Louisiana Income: All Races, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov 30

Louisiana Income: White and African American, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov 31

Louisiana Mortality: All Causes of Death, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov 32

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Louisiana Poverty: All Races, Whites and African Americans, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov 31

Map of Louisiana Cities and Roads, GEOLOGY.COM, https://geology.com/cities-map/louisiana.shtml..... 28

McCraw Surname Distribution Map, FOREBEARS, https://forebears.io/surnames/mccraw..... 24

Michael Tadman, *The Demographic Cost of Sugar: Debates on Slave Societies and Natural Increase in the Americas*, 105 AM. HIST. REV. 1534 (2000)..... 10

Nicholas Lemann, REDEMPTION: THE LAST BATTLE OF THE CIVIL WAR (2006)..... 16

Pete Daniel, *BREAKING THE LAND: THE TRANSFORMATION OF COTTON, TOBACCO, AND RICE CULTURES SINCE 1880* (1985).... 17

Pete Daniel, DISPOSSESSION: DISCRIMINATION AGAINST AFRICAN AMERICAN FARMERS IN THE AGE OF CIVIL RIGHTS (2013) 33

Petition of a number of citizens of Louisiana, praying for an alteration in a mail route, S. DOC. 274-26 (1840)..... 12

Poverty rate in the United States in 2023, by state, STATISTA, https://www.statista.com/statistics/233093/us-poverty-rate-by-state/..... 30

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Quaternary Geology and Geoarchaeology of the Lower Red River Valley (Whitney J. Autin & John Pearson eds., 1993)..... 7

Rachal Surname Distribution Map, FOREBEARS, https://forebears.io/surnames/rachal..... 22

Railway Systems Map, LA. DEP'T OF TRANSP. AND DEV., http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Multimodal/Data_Collection/Mapping/Wall%20Map/RailwaySystems_color.pdf..... 26

Ralph J. Ramsey & Harold Hoffsommer, *Farm Tenancy in Louisiana*, U.S. DEP'T OF AGRIC., BUREAU OF AGRIC. ECON. (1941)..... 17, 18

Rand McNally and Company, *Louisiana*, LIBRARY OF CONGRESS https://www.loc.gov/item/98688489/ (map dates to 1896).. 26

Raymond J. Burby, *Baton Rouge: The Making (and Breaking) of a Petrochemical Paradise*, *in* TRANSFORMING NEW ORLEANS AND ITS ENVIRONS: CENTURIES OF CHANGE (Craig Colten ed., 2000)..... 20

Rebecca Scott, DEGREES OF FREEDOM: LOUISIANA AND CUBA AFTER SLAVERY (2005)..... 15

Red River, DAILY PICAYUNE (New Orleans, La.), Aug. 3, 1844..... 13

RED RIVER BANK, https://www.redriverbank.net/locations/..... 29

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

The Red River Country, DAILY NATIONAL INTELLIGENCER (Washington, D.C.), Aug. 21, 1817 ..... 5, 7

The Red River Country, *in* UNIVERSAL GAZETTEER OF THE WORLD: A DICTIONARY, GEOGRAPHICAL, HISTORICAL AND STATISTICAL (Z. & B.F. Pratt eds., 1852) .. 5, 9

Red River Delegates Back, NEW ORLEANS STATES (New Orleans, La.), Nov. 19, 1927 14

Red River Presbytery Delegates Return, SHREVEPORT JOURNAL (Shreveport, La.), Oct. 13, 1921 14

Red River Research Station, LSU AGCENTER, https://www.lsuagcenter.com/portals/our_offices/research_stations/red river 28

RED RIVER VALLEY ASS'N, https://rrva.org/ .. 29

RED RIVER WATERWAY COMM'N, https://redriverwaterway.com/ 29

Richard L. Engstrom et al., *Louisiana*, *in* QUIET REVOLUTION IN THE SOUTH: THE IMPACT OF THE VOTING RIGHTS ACT, 1965–1990 (Chandler Davidson & Bernard Grofman eds., 1994) 34

Robert H. Gudmestad, A TROUBLESOME COMMERCE: THE TRANSFORMATION OF THE INTERSTATE SLAVE TRADE (2003) 10

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Robert Gudmestad, *Steamboats and the Removal of the Red River Raft*, 52 LA. HIST. 389 (2011) 8

Robert Gudmestad, STEAMBOATS AND THE RISE OF THE COTTON KINGDOM (2011) 7, 8, 13

Shane K. Bernard, THE CAJUNS: AMERICANIZATION OF A PEOPLE (2009)..... 3

Seventeenth Census of the United States, United States National Archives, https://www.ancestry.com 21, 23-25

Solomon Northup, TWELVE YEARS A SLAVE (1853) 10

Stephen W. Stathis, LANDMARK LEGISLATION, 1774-2012: MAJOR U.S. ACTS AND TREATIES (2014) 26

Ted Tunnell, *Coushatta Massacre*, 64 PARISHES (Jan. 18, 2021), https://64parishes.org/entry/coushatta-massacre..... 16

Terri Richardson, *Thursday is Jack Dillard Day of Appreciation*, MARSHALL NEWS MESSENGER (Mar. 30, 2010) https://www.marshallnewsmessenger.com/news/thursday-is-jack-dillard-day-of-appreciation/article_c99812ac-1076-580c-ada2-c2bf8be53f0b.html 29

Testimony of B.W. Marston Re: The Coushatta Affair, H.R. REP. NO. 816-44 (1872)..... 16

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

Thomas C. Buchanan, BLACK LIFE ON THE MISSISSIPPI: SLAVES, FREE BLACKS, AND THE WESTERN STEAMBOAT WORLD (2004) 13

Tom Blake, *DeSoto Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (Apr. 2001), https://sites.rootsweb.com/~ajac/desoto.htm 23

Tom Blake, *Natchitoches Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (May 2001), https://sites.rootsweb.com/~ajac/lanatchitoches.htm..... 21, 25

Tom Blake, *Rapides Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (Mar. 2001), https://sites.rootsweb.com/~ajac/larapides.htm 24

Tom Blake, *St. Landry Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (Mar. 2001), https://sites.rootsweb.com/~ajac/lastlandry.htm 23

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

U.S. Census Bureau, *1980 CENSUS OF POPULATION, SUPPLEMENTARY REPORTS: STANDARD METROPOLITAN STATISTICAL AREAS AND STANDARD CONSOLIDATED STATISTICAL AREAS* (1981) 20

U.S. Census Bureau, Decennial Censuses of 1830, 1840, 1850, and 1860, SOCIAL EXPLORER, INC., https://www.socialexplorer.com..... 3, 9, 10

U.S. Census Bureau, Decennial Censuses of 1910 and 1960, SOCIAL EXPLORER, https://www.socialexplorer.com..... 18-20

U.S. CENSUS BUREAU, *Table B04003, Total Ancestry Reported, 2013 American Community Survey 5-Year Estimates*, https://data.census.gov/table/ACSDT5Y2013.B04003?q=Total&g=040XX00US22$0500000 2-4

U.S. CENSUS BUREAU, *Table S1501, Educational Attainment, 2018-2022 American Community Survey 5-Year Estimates*, https://data.census.gov/table?q=education&g=040XX00US22$0500000 31-32

U.S. CENSUS BUREAU, *Table S1702, Poverty Status in the Past 12 Months of Families, 2018–2022 American Community Survey 5-Year Estimates,* https://data.census.gov/table/ACSST5Y2022.S1702?q=poverty%20rate&g=040XX00US22$0500000 ... 30

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF AUTHORITIES—Continued

Page(s)

U.S. DEP'T OF AGRICULTURE, *Louisiana State and Parish Data, Volume 1: Geographic Area Series, Part 18*, *in* 2022 CENSUS OF AGRICULTURE (2024) 32

Valery Gaienne Hyams, *A History of Navigation on Red River from 1815 to 1865* (Louisiana State University Doctoral Dissertation, 1939) 13

WHITEPAGES, whitepages.com 22-24

Women are United in Church Work, DAILY PICAYUNE (New Orleans, La.), May 13, 1913 14

RETRIEVED FROM DEMOCRACYDOCKET.COM

INTERESTS OF *AMICI CURIAE*[1]

Amici Dr. John Bardes of Louisiana State University, Dr. R. Blakeslee Gilpin of Tulane University, and Dr. Adam Fairclough of Leiden University (Emeritus), are expert historians of Louisiana and the greater American South. They file this brief to assist the Court in understanding why a robust historical record demonstrates that Louisiana's Congressional District 6, as set forth in SB8, reflects a longstanding community of interest in the state. This historical evidence, together with modern-day sociological data, reinforces the lay testimony of witnesses in the trial record. It supports that the District Court erred when it disregarded this testimony and instead relied on an incomplete and unreliable historical analysis to reach its conclusion that District 6 is not reasonably configured.

INTRODUCTION AND SUMMARY OF ARGUMENT

The Louisiana Legislature enacted SB8 to remedy an established violation under Section 2 of the Voting Rights Act of 1965 for its failure to draw at least two Black-opportunity Congressional districts in 2022. In crafting a remedial district, "States retain a flexibility [and] may avoid strict scrutiny altogether by respecting their own traditional districting principles." *Bush v. Vera*, 517 U.S. 952, 978 (1996). And even when strict scrutiny applies, "[a] § 2 district that is *reasonably* compact and regular, taking into account traditional districting principles such as maintaining communities of interest and traditional boundaries, may pass strict scrutiny without having to defeat rival compact

[1] No counsel for a party authored this brief in whole or in part, and no person other than amici or their counsel made a monetary contribution to this brief's preparation and submission.

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districts designed by plaintiffs' experts in endless 'beauty contests.'" *Bush v. Vera*, 517 U.S. 952, 977 (1996) (emphasis in original).

Communities of interest share common "needs and interests," including shared characteristics such as "socio-economic status, education, employment, [or] health," *LULAC v. Perry*, 548 U.S. 399, 432, 435 (2006) (internal quotation omitted), or other commonalities such as public transport infrastructure and institutions. *Bush v. Vera*, 517 U.S. at 964. Race may "correlate[] strongly" with these unifying traits, *see id.*, and states are "free" to recognize and preserve communities of interest "that have a particular racial makeup" as long as that "action is directed toward some common thread of relevant interests." *Miller v. Johnson*, 515 U.S. 900, 920 (1995).

The District Court committed clear error when it disregarded the evidence of communities of interest within District 6 and, instead, took impermissible judicial notice of extra-record materials that do not constitute a reliable or accurate historical analysis of the region. In particular, the District Court's determination that District 6 divides Louisiana's "Cajun" community, *Robinson* App.185a n.12, greatly exaggerates the homogeneity of Louisiana's parishes, misrepresents the distribution of residents who claim Cajun ancestry, and wrongly assumes that communities within a given space are mutually exclusive and non-overlapping. In none of the parishes that constitute District 6 do more than 3 percent of residents report their ancestry as "Cajun," according to the latest census figures.[2]

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[2] U.S. CENSUS BUREAU, *Table B04003, Total Ancestry Reported, 2013 American Community Survey 5-Year Estimates*,

Prioritizing that group's claim to historical cohesiveness over all other overlapping claims elevates the interests of a small minority over those of the broader plurality. Leading historical scholarship on the Cajun people, moreover, recognizes that Louisiana's "Acadiana" region is a recent invention, influenced in part by the interests of the state's tourism economy.[3]

Likewise, the District Court's determination that District 6 violates "the traditional north-south" divide between "creoles" of French-Spanish colonial ancestry and the descendants of more recent Anglo-American migrants is based on a simplistic and historically inaccurate understanding of Louisiana's history. The colonial census of 1800 (the last before the Louisiana Purchase) recorded 44,116 persons in Louisiana, while the 1850 U.S. census documented 517,762 residents—a more than tenfold increase in just five decades, during which the state experienced its five highest rates of decennial growth in its entire history.[4] Across all Louisiana parishes, the predominant ancestral groups are Anglo-American migrants, Black and white, who arrived from the upper United States after the

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https://data.census.gov/table/ACSDT5Y2013.B04003?q=Total&g=040XX00US22$0500000 (last visited Dec. 17, 2024).

[3] *See, e.g.*, Carl L. Bankston III & Jacques Henry, *Spectacles of Ethnicity: Festivals and the Commodification of Ethnic Culture among Louisiana Cajuns,* 20 SOCIO. SPECTRUM 377 (2000); Shane K. Bernard, THE CAJUNS: AMERICANIZATION OF A PEOPLE (2009).

[4] Gwendolyn Midlo Hall, AFRICANS IN COLONIAL LOUISIANA: THE DEVELOPMENT OF AFRO-CREOLE CULTURE IN THE EIGHTEENTH CENTURY (1992), 278; U.S. CENSUS BUREAU, Decennial Censuses of 1850, SOCIAL EXPLORER, https://www.socialexplorer.com (last visited Dec. 21, 2024).

Louisiana Purchase.[5] Once again, the interests of a minority should not supersede those of a larger plurality.

Several witnesses have testified that District 6 is united by the I-49 corridor and the Red River, and that the population shares a common ancestry and similar cultural and socio-economic characteristics. *See Robinson* App. 149a–151a; *see also Robinson* App. 66a–69a (testimony of Mayor Glover), 69a–77a (testimony of Ms. Shelton), 117a–119a (testimony of Commissioner Lewis), 225a (testimony of Rev. Harris), App.420a–423a (statement by Sen. Womack).

This lay testimony is supported by the historical record of the Red River Valley as a distinct and long-recognized community of interest in Louisiana. District 6 of SB8 closely aligns with the historical boundaries of this region.

The Red River Valley has been recognized as a cohesive geographical, agricultural, economic, social, and political unit for over two hundred years. Beginning in the early 19th century, this narrow and highly fertile floodplain became a center of intensive cotton production that relied upon enslaved labor. Today's Black population, a latticework of interconnected communities, is largely descended from those enslaved laborers. Because of its distinctive agriculture and Black majority population, Louisiana's Red River Valley has also long been recognized as dissimilar to the regions immediately bordering it to the northeast and southwest. Both the historical record and contemporary evidence support the lay witness testimony that

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[5] U.S. CENSUS BUREAU, *Table B04003, Total Ancestry Reported, 2013 American Community Survey 5-Year Estimates*, https://data.census.gov/table/ACSDT5Y2013.B04003?q=Total&g=040XX00US22$0500000 (last visited Dec. 21, 2024).

District 6 constitutes a well-established community of interest. The District Court's finding to the contrary is an error of fact supporting reversal.

ARGUMENT

I. District 6 Closely Aligns with Louisiana's Historic Red River Valley, a Long-Recognized Community of Interest.

The Red River traverses Louisiana from Shreveport in the northwest to the Mississippi River in the southeast. After America gained control of the Louisiana Territory, the agricultural boom of cotton production helped create a unique identity for this area, commonly referred to then as the "Red River region" or "Red River country."[6] Mid-19th century structural changes diverted the Red River's flow into the Atchafalaya River, creating a single river system that connected the communities now within District 6, as shown below.[7]

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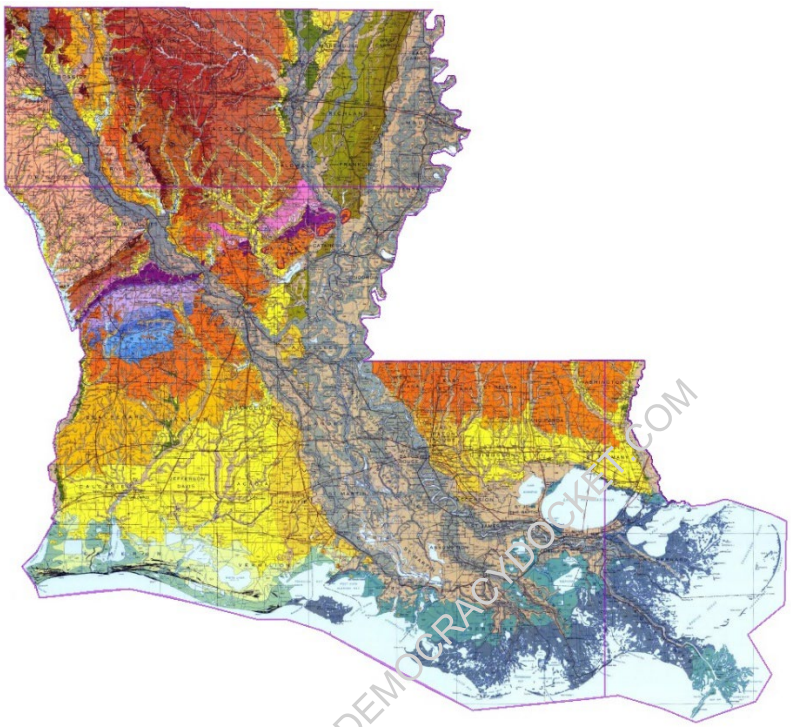
[6] *See, e.g.*, *The Red River Country,* DAILY NATIONAL INTELLIGENCER (Washington, D.C.), Aug. 21, 1817 [hereinafter INTELLIGENCER]; *The Red River Country*, *in* UNIVERSAL GAZETTEER OF THE WORLD: A DICTIONARY, GEOGRAPHICAL, HISTORICAL AND STATISTICAL 759–60 (Z. & B.F. Pratt eds., 1852) [hereinafter GAZETTEER].

[7] Image from *Geologic Map of Louisiana*, U.S. GEOLOGICAL SURV. (Nov. 30, 2000), https://www.usgs.gov/media/images/geologic-map-louisiana (last visited Dec. 17, 2024).



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The Valley's historical distinctiveness derives in part from its geology. The Red River and its snaking web of tributaries and lakes carry and deposit vast amounts of nutrient-rich sediment from the Great Plains. This composition gives the water its distinctive reddish hue and creates a soil composition ideally suited for intensive cash-crop agriculture (which in turn attracted plantations). The Valley contrasts with the sandy, low-fertility soil in the lands to either side of the river in the northeast and southwest, leading to dissimilar agricultural uses, settlement patterns, and present-day demographic profiles compared to the Red River Valley.[8]

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[8] David P. Russ, *The Quaternary Geomorphology of the Lower Red River Valley, Louisiana* (Pennsylvania State University

The history of present-day communities within the Red River Valley begins with the migration of would-be cotton farmers and their enslaved workforces. After the 1803 Louisiana Purchase, land prospectors quickly recognized the floodplain's exceptional suitability for cotton production.[9]

Settlement was initially inhibited, however, by the region's inaccessibility. There were no roads into the Valley and only two rudimentary overland trails.[10] Consequently, travel, transport, and farmers' ability to bring their goods to market depended entirely on the Red River and its tributary network.

To allow for the passage of steamboats and thus enable the development of cotton plantations, a series of sandbars, debris, and other natural obstructions had to first be cleared.[11] In 1829, the U.S. Army Corps of Engineers enlisted steamboat builder Henry Miller Shreve to remove these obstructions and open the Red River Valley to extensive cotton cultivation. In 1831, in

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Doctoral Dissertation, 1975); J.R. Schultz & E.L. Krinitzsky, *Geology of the Lower Red River*, Technical Memorandum No. 3-319. (Vicksburg, Ms.: U.S. Army Engineer Waterways Experiment Station, 1950); David C. Weindorf, *An Update of the Field Guide to Louisiana Soil Classification (Bulletin No. 889)*, LA. STATE UNIV. AGCENTER BULLETINS (2008); *Quaternary Geology and Geoarchaeology of the Lower Red River Valley* (Whitney J. Autin & John Pearson eds., 1993).

[9] *See* INTELLIGENCER, *supra* note 6.

[10] Glenn Martel, *Early Days in Northwest Louisiana*, 12 AM. HIST. QUARTERLY 120–21 (1953).

[11] Robert Gudmestad, STEAMBOATS AND THE RISE OF THE COTTON KINGDOM 81–82, 130 (2011) [hereinafter Gudmestad, STEAMBOATS AND THE RISE OF THE COTTON KINGDOM]; C. Geoffrey Mangin, *Clearing the Great Raft: Impetus for Economic Growth in Louisiana's Red River Valley, 1830-1860*, 31 N. LA. HIST. 32 (2000).

Pointe Coupée Parish, Shreve oversaw the construction of a canal at a long, C-shaped curve in the Mississippi River, transforming what had been two separate waterways (the Red and Atchafalaya Rivers) into one single, cohesive river system.[12] From 1833 through 1838, Shreve removed the "Great Raft"—a massive, centuries-old logjam that stretched more than 160 miles upriver from Campti, Louisiana to the present-day site of Shreveport, Louisiana, opening the Red River system to steamboat travel and uniting communities along the Red River floodplain. These environmental modifications collected settlements within the Red River Valley into a cohesive network that was also closely attached to communities within the Atchafalaya River floodplain, including parts of Avoyelles, St. Landry, Lafayette, West Baton Rouge, and Pointe Coupée Parishes.

A new logjam quickly formed immediately upriver of Shreveport, blocking any further upriver travel and transport until it was removed in 1873, and drawing a hard line of American settlement along the Atchafalaya-Red River system.[13] The economic futility of traversing this blockage dictated historical settlement to such an extent that the former barrier broadly aligns with the northwestern boundary of District 6.

Most settlers and their enslaved workforces migrated into the valley in the immediate aftermath of Shreve's engineering feats. Between 1830 and 1860, the population density of Red River Valley parishes ballooned:

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[12] Gudmestad, STEAMBOATS AND THE RISE OF THE COTTON KINGDOM, *supra* note 11, at 131–33.

[13] Robert Gudmestad, *Steamboats and the Removal of the Red River Raft*, 52 LA. HIST. 389 (2011); Carl Newton Tyson, THE RED RIVER IN THE SOUTHWESTERN HISTORY, 152 (1981).

Natchitoches Parish leapt from 1.4 to 10.1 persons per square mile, Rapides Parish from 3.4 to 9.0, Avoyelles Parish from 2.9 to 15.2, and St Landry Parish from 1.7 to 10.1. Caddo Parish, established by the state legislature in 1838, saw an even more dramatic rise: From 1840 to 1860, its population density increased from 3.3 to 12.2 persons per square mile.[14]

Cotton plantations quickly dominated the region, described in a 19th-century encyclopedia as "particularly adapted to the cotton culture" and yielding "more bales to the acre probably than any other extensive district."[15] Settlers described "immense fields of cotton higher than my head on my horse,"[16] so dense and uniform that the entire floodplain appeared "covered with snow."[17] In 1842, cotton merchants estimated that the Red River Valley produced 200,000 bales of cotton: nearly one-tenth of all the cotton produced in the United States that year.[18]

These plantations required large labor forces to plant, weed, and hand-pick the bulbous cotton fibers from the plants. After the international slave trade ended in 1808, Red River Valley cotton entrepreneurs

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[14] Population data based on the U.S. Census Bureau, Decennial Censuses of 1830, 1840, 1850, and 1860, SOCIAL EXPLORER, INC., https://www.socialexplorer.com (last visited November 22, 2024).

[15] GAZETTEER, *supra* note 6, at 759–60.

[16] Carin Peller-Semmens, *Unreconstructed: slavery and emancipation on Louisiana's Red River, 1820-1880*, 15 (University of Sussex, Doctoral Dissertation, American Studies, 2016) (quoting a letter from D.B. Allen written Nov. 13, 1851).

[17] Friedrich Gërstacker, GËRSTACKER'S LOUISIANA: FICTION AND TRAVEL SKETCHES FROM ANTEBELLUM TIMES THROUGH RECONSTRUCTION 28 (Irene di Maio trans., 2006).

[18] GAZETTEER, *supra* note 6, at 759.

met their labor needs by importing enslaved communities from other States.[19] The most famous firsthand account of this forced migration is that of Solomon Northup, taken to Avoyelles Parish in 1841, whose detailed memoir of slavery in the Red River Valley was the basis of the Oscar-winning 2013 film, *Twelve Years a Slave*.[20] By 1860, all of the parishes within the Atchafalaya-Red River system had Black majorities.[21]

Though disjointed by this forced relocation, the enslaved survivors of this journey quickly formed stable, cohesive, self-reproducing communities. Cotton cultivation within the Atchafalaya-Red River system fostered plantation conditions that supported natural population growth, and by extension, a high degree of community stability even compared to other plantation regions. For example, plantations in Louisiana's sugar-producing regions—where death rates exceeded birth rates and gender ratios were skewed[22]—required the constant importation of enslaved people from other parts of the country. By contrast, enslaved communities within the Red River Valley experienced high rates of natural population growth.[23]

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[19] On this domestic slave trade, see Robert H. Gudmestad, A TROUBLESOME COMMERCE: THE TRANSFORMATION OF THE INTERSTATE SLAVE TRADE (2003); Joshua D. Rothman, THE LEDGER AND THE CHAIN: HOW DOMESTIC SLAVE TRADERS SHAPED AMERICA (2021).

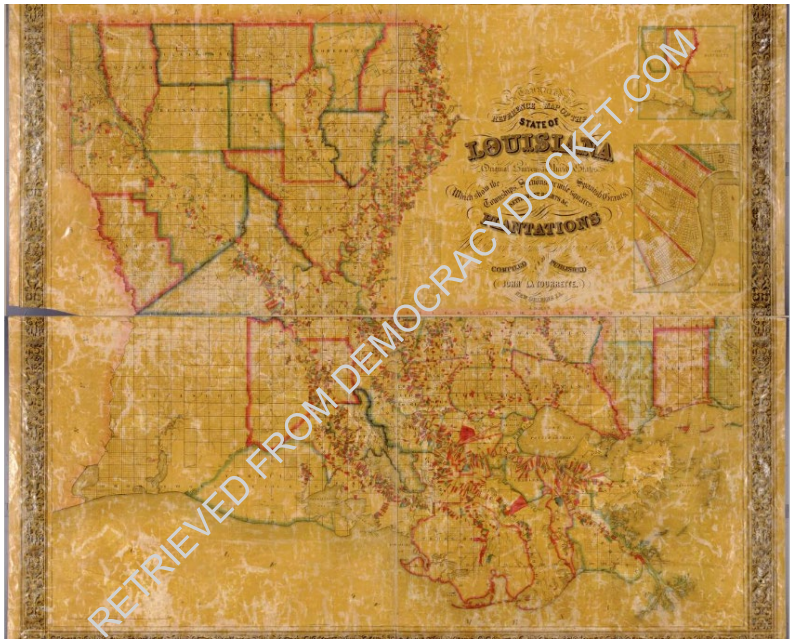
[20] Solomon Northup, TWELVE YEARS A SLAVE (1853).

[21] Population data based on the U.S. Census Bureau, Decennial Censuses of 1850 and 1860, SOCIAL EXPLORER, INC., https://www.socialexplorer.com (last visited Nov. 22, 2024).

[22] Michael Tadman, *The Demographic Cost of Sugar: Debates on Slave Societies and Natural Increase in the Americas*, 105 AM. HIST. REV. 1534 (2000), 1536–37, 1542–55.

[23] Peller-Semmens, *Unreconstructed*, *supra* note 16, at 47–50; Tadman, *The Demographic Cost of Sugar*, *supra* note 22.

The best alluvial soil was confined to the immediate banks of the Atchafalaya-Red River system, which meant that settlement followed long, narrow strips of highly concentrated cotton cultivation. This settlement pattern is clearly discernable on maps of the period, showing parallel strips of cotton plantations along the banks of the Atchafalaya-Red River system and its lines of parallel tributaries, including the map of Louisiana's largest plantations in 1848 shown below.[24]



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Consequentially, cotton cultivation and Black settlement were concentrated in the same narrow strips of land that flanked the river system, reaching from the northwest end of the state down southeast. As one

[24] Image from *La Tourrette's reference map of the state of Louisiana,* LIBRARY OF CONGRESS, https://www.loc.gov/item/2006629760/ (last visited Dec. 20, 2024).

moved further away from the river system, geology, land use, and demographic patterns rapidly changed.

Settlers and travelers repeatedly described how dissimilar the narrow cotton-producing floodplain was to the regions immediately southwest and northeast. For example, in 1853, the famous landscape architect Frederick Law Olmsted highlighted the stark demographic divide between river-adjacent and off-river communities. Whereas the overwhelming majority of people living within the floodplain were Black (enslaved people working on cotton plantations), Black people were rarely encountered in the piney woods, where the poorer farmers and cattle ranchers "seldom own slaves."[25] This settlement pattern, shaped by geological features, remains powerfully coherent 175 years later, corresponding to today's boundaries and dimensions of District 6.

Because Red River Valley settlers were entirely reliant on riverways for travel and transport, the peoples living within the floodplain were geographically isolated from those living further from that river system. In an 1840 petition for a new mail route, for example, residents of Rapides Parish noted that the journey from Alexandria to the Mississippi River took "two and three months" over land; via the Atchafalaya-Red River route, that same journey took only a matter of hours by steamboat.[26]

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[25] Frederick Law Olmsted, A JOURNEY IN THE SEABOARD SLAVE STATES, WITH REMARKS ON THEIR ECONOMY 628 (1856).

[26] *Petition of a number of citizens of Louisiana, praying for an alteration in a mail route,* S. DOC. 274-26, at 1 (1840).

By 1840, over forty steamboat lines provided regular service along the Atchafalaya-Red River system.[27] By 1860, there were more than 100 steamboat lines along that route.[28] For both enslaved and free people, proximity to the river provided degrees of access to material goods, travel, and information that were comparatively unavailable in remote inland regions. Enslaved and formerly enslaved people frequently described how Black communities along the river were culturally and socially distinct, shaped by the river's exceptional connectivity and opportunities.[29]

As a result of these settlement patterns, Louisianians have consistently referred to residents of the Red River Valley as a distinct population, with shared interests and concerns, and in certain respects different from neighboring communities. At Louisiana's 1844–45 State Constitutional Convention, for example, commentators and reporters repeatedly described "the members of the Convention from the Red River country" as a bloc that behaved as a (sometimes frustratingly) coherent political unit.[30] Despite the upheavals and destruction of the intervening Civil War, "The delegates from the Red River country" were still identified as a distinct political bloc during the

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[27] Emerson W. Gould, FIFTY YEARS ON THE MISSISSIPPI; OR, GOULD'S HISTORY OF RIVER NAVIGATION 235 (1889).

[28] Valery Gaienne Hyams, *A History of Navigation on Red River from 1815 to 1865*, at 65–66 (Louisiana State University Doctoral Dissertation, 1939).

[29] *See generally*, Thomas C. Buchanan, BLACK LIFE ON THE MISSISSIPPI: SLAVES, FREE BLACKS, AND THE WESTERN STEAMBOAT WORLD (2004), 6–8, 88–100; Gudmestad, STEAMBOATS AND THE RISE OF THE COTTON KINGDOM, 48–51, 155, *supra* note 11.

[30] *From Red River*, DAILY PICAYUNE (New Orleans, La.), Aug. 3, 1844.

1874 State Democratic Party Convention.[31] Periodically, Red River Valley residents petitioned Federal Congress in this very formation, as in 1927 when a "delegation of the Red River Valley" traveled to Washington D.C. and met with members of Congress.[32] The phrase, "Delegates from the Red River" was ubiquitous at the numerous religious conventions that met across the 20th century.[33] Similarly, Red River valley planters and business-owners have repeatedly formed organizations to lobby for what they clearly understood as their unique communal interests. For instance, in 1883, delegates from across the valley met in Natchitoches where they organized the "Red River Planters' and Merchants' Transportation Company."[34]

II. The Red River Valley's Black Population Shares a Common Lineage of Slavery.

Today's Black communities trace their ancestry to individuals brought by white settlers during the river system's antebellum land rush. Unlike in more volatile regions where Black populations experienced greater geographic mobility before and after the Civil War, the Black communities along the Atchafalaya-Red River system have remained unusually stable and rooted, from emancipation to this day.

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[31] DAILY PICAYUNE (New Orleans, La.), Aug. 21, 1874.

[32] *Red River Delegates Back*, NEW ORLEANS STATES (New Orleans, La.), Nov. 19, 1927.

[33] *Women are United in Church Work*, DAILY PICAYUNE (New Orleans, La.), May 13, 1913; *Red River Presbytery Delegates Return*, SHREVEPORT JOURNAL (Shreveport, La.), Oct. 13, 1921; *6 to Represent Red River Presbytery at General Assembly*, SHREVEPORT JOURNAL (Shreveport, La.), May 24, 1952.

[34] DAILY PICAYUNE (New Orleans, La.), May 25, 1883.

A. Post-Reconstruction White Supremacy Limited the Mobility of Red River Valley's Freedmen.

Although the Civil War and Reconstruction disrupted populations across the South and Louisiana, the Red River region within District 6 maintained remarkable continuity during these tumultuous years. What followed was a period in which white farmers reasserted their political, social and cultural power, violently suppressing Black populations and effectively binding them to the region. This repression severely limited the economic or social mobility necessary for migration out of the valley.

From 1865 to 1880, an array of "white-supremacist leagues, clubs, and 'rifle companies'" dedicated themselves to the task of suppressing the social and political freedom of the region's freedpeople.[35] Through violence and intimidation, racist organizations like the Knights of the White Camelia, the Ku Klux Klan and the White League decimated Black political participation. White terrorism reached its apotheosis on Easter Sunday of 1873 in the Colfax Massacre, in which an armed white mob murdered about a hundred Black men, women, and children in and outside the courthouse of Colfax, a town on the Red River near Alexandria.[36]

White supremacists realized that Republican rule during Reconstruction relied heavily on votes from freed Black people in the "alluvial bottomlands," along

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[35] Rebecca Scott, DEGREES OF FREEDOM: LOUISIANA AND CUBA AFTER SLAVERY 49 (2005).

[36] Eric Foner, THE SECOND FOUNDING: HOW THE CIVIL WAR AND RECONSTRUCTION REMADE THE CONSTITUTION 335 (2019); *see also* LeeAnna Keith, THE COLFAX MASSACRE: THE UNTOLD STORY OF BLACK POWER, WHITE TERROR, AND THE DEATH OF RECONSTRUCTION (2008).

the Red River.[37] This led to the rapid rise of the White League, a white supremacist militia organization, in the Red River Valley.[38] Just one year after the *Slaughter-House* rulings (1873), Louisiana experienced two more of the most significant acts of violence in the state's history, both aimed at disenfranchising Black citizens: the Coushatta Massacre (in which the local White League assassinated six white Republicans and as many as 20 Black bystanders who witnessed the killings in the Red River-adjacent community[39]) and New Orleans' Battle of Liberty Place.

This combination of terroristic violence, voter intimidation, and weakened federal authority undermined Black political activism in the Red River Valley. Stripped of political representation, Black Louisianians were rendered vulnerable to the control of the plantation owners who owned the vast majority of the region's agricultural land. As a result, these Black farmhands and their families found it exceedingly difficult to achieve economic or social mobility or to migrate out of the valley.

With the collapse of Republican government and the withdrawal of federal support, sharecropping became the dominant and increasingly oppressive labor system within the Red River Valley. Sharecropping trapped Black farmers in cycles of debt due to exploitative

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[37] Ted Tunnell, *Coushatta Massacre*, 64 PARISHES (Jan. 18, 2021), https://64parishes.org/entry/coushatta-massacre.

[38] *See* Nicholas Lemann, REDEMPTION: THE LAST BATTLE OF THE CIVIL WAR 25 (2006); *see also* James G. Hollandsworth, PORTRAIT OF A SCIENTIFIC RACIST: ALFRED HOLT STONE OF MISSISSIPPI 57 (2008) (quoting Judge J.B. Chrisman).

[39] *Testimony of B.W. Marston Re: The Coushatta Affair*, H.R. REP. NO. 816-44, at 645–727 (1872).

terms, high interest rates charged by farm commissaries, and poor harvests. By the late 19th century, sharecropping was firmly entrenched on plantations in the Red River Valley, effectively stifling opportunities for Black economic and social advancement. These conditions contributed to exceptionally low rates of outbound migration among Black families in the region, even compared to other Black communities in the American South.[40]

A 1941 United States Department of Agriculture report on sharecropping in Louisiana concluded that those Black farmers who lived and worked under the most restrictive sharecropping arrangements were most heavily concentrated along the Atchafalaya-Red River system, particularly in Caddo, DeSoto, Natchitoches, Avoyelles, St. Landry, and Pointe Coupée Parishes. These farmers faced unusually strict control and surveillance by white landowners and overseers, with little autonomy in decision-making.[41] The report also highlighted that the highest concentration of "unpaid family laborers"—wives, children, and other dependent relatives of sharecropping household heads, working without any direct monetary compensation—was found along the Atchafalaya-Red River system, particularly in Caddo, DeSoto, Natchitoches, St. Landry, and Pointe Coupée Parishes.[42] It concluded

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[40] On the rise of sharecropping, see Pete Daniel, *BREAKING THE LAND: THE TRANSFORMATION OF COTTON, TOBACCO, AND RICE CULTURES SINCE 1880* (1985); Edward Royce, *THE ORIGINS OF SOUTHERN SHARECROPPING* (1993); Gavin Wright, *OLD SOUTH, NEW SOUTH: REVOLUTIONS IN THE SOUTHERN ECONOMY SINCE THE CIVIL WAR* (1986).

[41] *Ralph J. Ramsey & Harold Hoffsommer*, *Farm Tenancy in Louisiana*, U.S. DEP'T OF AGRIC., BUREAU OF AGRIC. ECON. 12 (1941).

[42] *Id.* at 5, Figure 8.

that agricultural laborers in the Red River Valley tended to be the most economically exploited and directly supervised in Jim Crow Louisiana.[43]

B. Black Habitation Remained Remarkably Stable During the Great Migration and 20th Century Urbanization.

The Great Migration, the most significant demographic shift in African American history, refers to the mass movement of an estimated six million Black Americans out of the American South to the industrializing cities of the North. Motivated by intensifying discrimination and a lack of social and economic opportunities in the South, large numbers of Black Americans left their birthplaces and migrated for high-paying factory work in the North, Midwest, and West.[44]

But unlike Black communities in the South as a whole or even in Louisiana's other agricultural region, Black communities in Louisiana's Red River Valley remained remarkably stable. Between 1910 and 1960, the Black population of the ten parishes that make up District 6 grew from 197,572 to 302,841—a 53.3% increase. This contrasts sharply with the population decline in Louisiana's other cotton-intensive agricultural region, located along the northeastern edge of the state.[45] In other words, Black communities in the Red

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[43] *See id.* at 17.

[44] Carole Marks, *FAREWELL—WE'RE GOOD AND GONE: THE GREAT BLACK MIGRATION* (1989); Isabel Wilkerson, *THE WARMTH OF OTHER SUNS: THE EPIC STORY OF AMERICA'S GREAT MIGRATION* (2010).

[45] In the five main parishes of Louisiana's northeastern region (East Carroll, Madison, Tensas, Concordia, and West Feliciana), the Black population fell from 58,411 in 1910 to 44,767 in 1960—a 23.4% decrease. Population data based on the U.S. Census

River Valley largely remained in place, even as Black Southerners fled other regions.

This relative population stability reflected two factors. First, Black families were denied opportunities for out-migration due to the restrictive economic and social conditions within the Red River Valley. Second, the Great Migration coincided with the rapid growth of urban industrial centers—in particular, the cities of Shreveport, Alexandria, and Baton Rouge—within the present-day boundaries of District 6. These industrializing cities provided demographic stability by absorbing many of the Black migrants from the Red River Valley who would otherwise have left Louisiana entirely. Put another way, whereas Black southerners from other agricultural regions tended to leave the South altogether, those living in the Red River Valley were able to find industrial job opportunities within their own region.

Urbanization within the present-day boundaries of District 6 was jumpstarted by Louisiana's oil boom.[46] In 1904, the discovery of oil immediately outside of Shreveport triggered that city's rapid growth.[47] Between 1910 and 1960, the Black population of Shreveport grew from 13,896 to 55,607, while the city's overall population grew from 28,015 to 164,372.[48] The

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Bureau, Decennial Censuses of 1910 and 1960, SOCIAL EXPLORER, https://www.socialexplorer.com (last visited Nov. 22, 2024).

[46] William D. Reeves, *HISTORIC LOUISIANA: AN ILLUSTRATED HISTORY* 59 (2002).

[47] Henry Alexander Wiencek, *OIL CITIES: THE MAKING OF NORTH LOUISIANA'S BOOMTOWNS, 1901–1930* (2024).

[48] Campbell Gibson & Kay Jung, *Historical Census Statistics On Population Totals By Race, 1790 to 1990, and By Hispanic Origin, 1970 to 1990, For Large Cities And Other Urban Places In*

rapid industrialization and growth of Baton Rouge was triggered by Standard Oil Company's construction of an enormous refinery there in 1909. That refinery grew to be the world's largest.[49]

Between 1910 and 1960, Baton Rouge's Black population grew from 7,899 to 45,475, while the city's overall population rose from 14,897 to 152,419.[50] Similarly, Alexandria experienced rapid growth, spurred by the construction of Army and Army Air Bases nearby during both world wars. Alexandria was home to only 11,213 residents in 1910 but by 1970, 131,740 persons lived in the Alexandria Metropolitan Statistical Area.[51] Despite the changes wrought by the mechanization of cotton plantations and a declining demand for agricultural labor, displaced farmworkers living along the Atchafalaya-Red River remained in the region. They found stable employment in Shreveport, Baton Rouge, and Alexandria, relocating to cities still within the present-day boundaries of District 6.

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The United States 59 tbl.19 (U.S. Census Bureau Population Div., Working Paper No. 76, 2005).

[49] Raymond J. Burby, *Baton Rouge: The Making (and Breaking) of a Petrochemical Paradise*, *in* TRANSFORMING NEW ORLEANS AND ITS ENVIRONS: CENTURIES OF CHANGE 160, 164–68 (Craig Colten ed., 2000); George Brown Tindall, THE EMERGENCE OF THE NEW SOUTH, 1913–45 (1967).

[50] *See supra* note 48.

[51] U.S. Census Bureau, *1980 CENSUS OF POPULATION, SUPPLEMENTARY REPORTS: STANDARD METROPOLITAN STATISTICAL AREAS AND STANDARD CONSOLIDATED STATISTICAL AREAS* 6 (1981); U.S. Census Bureau, Decennial Censuses of 1910 and 1960, SOCIAL EXPLORER, https://www.socialexplorer.com (data for 1910) (last visited Nov. 22, 2024).

C. Surname Analysis Evidences the Stability of the Red River Valley's Black Community from the 19th Century to the Present Day.

One method for identifying the enduring presence of these communities is by tracking the occurrence of uncommon surnames. This approach reveals that descendants of the enslaved communities living along the Atchafalaya-Red River system in 1860 remained heavily concentrated along that same river system nearly a century later (according to the 1950 census, the most recent year for which enumerated persons' identifying information is publicly released) and even up to the present (based on current sources like the Whitepages).

For example, in Natchitoches Parish in 1860, one of the largest slaveholders was a white Louisianian named Victor Rachal, who claimed ownership of fifty-five people.[52] In 1950, 340 Black Louisianians bore this unusual "Rachal" surname: 208 lived in Natchitoches Parish (61.2 percent) while 103 lived in other parishes included in District 6 (30.3 percent). In an astonishing testament to the cohesion of the Red River Black community across time, only 29 Black Louisianians with the "Rachal" surname (8.5 percent) lived in a parish not included in District 6.[53]

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[52] Tom Blake, *Natchitoches Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (May 2001), https://sites.rootsweb.com/~ajac/lanatchitoches.htm.

[53] For 1950 census rolls, see *Seventeenth Census of the United States,* United States National Archives, reproduced on USNA microfilm publication T628 and accessed via https://www.ancestry.com.

Further analysis reveals that, even today, a large majority of the descendants of people enslaved by Victor Rachal of Natchitoches Parish continue to reside in District 6. For example, according to the Whitepages' online directory, the four census-designated places in Louisiana with the highest number of individuals bearing the "Rachal" surname are the cities of Natchitoches (206 entries, or 11.2 percent), Alexandria (197 entries, or 10.7 percent), Shreveport (163 entries, or 8.8 percent) and Pineville, an Alexandria suburb (121 entries, or 6.6 percent). All of these locations are within District 6 and on the Red River.[54] Overall, at least 1,109 of the 1,846 "Rachal" surname entries in Louisiana (60.1 percent) are concentrated in the parishes constituting District 6. Similar results are revealed by Forebears.io, a digital database of surname distributions: throughout the entirety of the United States, the three U.S. counties with the greatest concentrations of people with the "Rachal" surname are Natchitoches Parish, Louisiana (91 persons per ten thousand), Rapides Parish, Louisiana (32 per ten thousand), and Avoyelles Parish, Louisiana (27 per ten thousand): again, all within District 6 parishes.[55] In other words, during the twentieth and twenty-first centuries, most paternal descendants of the people enslaved by Victor Rachal in Natchitoches Parish have either remained in Natchitoches Parish or moved to cities in District 6.

This pattern of Black constancy was replicated across the Red River Valley. In 1860 in St. Landry Parish, the plantation-owner Hyacinth Joubert claimed

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[54] WHITEPAGES, whitepages.com (last visited Dec. 17, 2024).

[55] *Rachal Surname Distribution Map*, FOREBEARS, https://forebears.io/surnames/rachal (last visited Dec. 17, 2024).

ownership of 74 enslaved persons.[56] In 1950, census takers identified 182 Black Louisianians with the "Joubert" surname, of whom 151 lived in St. Landry Parish (83.0 percent) and 13 lived in another parish included in District 6 (7.1 percent); only 18 Black persons named "Joubert" lived in parishes not comprising District 6 (9.9 percent).[57] Today, Whitepages has 981 entries for the "Joubert" surname in Louisiana. At least 510 of those entries (52.0 percent) are of people in the parishes of District 6; the largest single concentration is still found in St. Landry Parish (at least 279 entries, or 28.4 percent).[58] According to Forebears.io, the county with the single greatest concentration of "Joubert" persons is St. Landry Parish, Louisiana.[59]

In 1860 in DeSoto Parish, J.H. McCraw claimed ownership of 54 people.[60] In 1950, census takers documented 35 Black Louisianians with the "McCraw" surname, 21 of whom lived in DeSoto Parish (60.0 percent) and two of whom lived in Caddo Parish (5.7 percent); only 12 people (34.3 percent) lived in parishes excluded from District 6. Today, Whitepages lists 93 entries for persons with the "McCraw" surname

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[56] Tom Blake, *St. Landry Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (Mar. 2001), https://sites.rootsweb.com/~ajac/lastlandry.htm.

[57] *See supra* note 53.

[58] *See supra* note 54.

[59] *Joubert Surname Distribution Map*, FOREBEARS, https://forebears.io/surnames/joubert (last visited Dec. 17, 2024).

[60] Tom Blake, *DeSoto Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (Apr. 2001), https://sites.rootsweb.com/~ajac/ladesoto.htm.

in Louisiana. The largest number of Louisianians with the McCraw surname are found in Shreveport (21 persons, or 22.6 percent). According to Forebears.io, the greatest concentration of Louisianians named "McCraw" is found in DeSoto Parish.[61]

In 1860 in Rapides Parish, a woman named Adelia E. Casson claimed ownership of 416 people.[62] In 1950, 90 Black Louisianians bore the "Casson" surname; 10 lived within Rapides Parish (11.1 percent) while 67 (74.4 percent) lived in other District 6 parishes; only 13 persons (14.4 percent) lived in parishes excluded from District 6.[63] Today, the Whitepages lists 97 entries for Louisiana residents with the "Casson" surname. The four largest numbers of persons with that surname live in the cities of Natchitoches (36 entries, or 37.1 percent), Shreveport (23 entries, or 23.7 percent), Alexandria (6 entries, or 6.2 percent), and Baton Rouge (4 entries, or 4.1 percent). Each of these towns are in District 6. All told, 78 of the 97 entries for "Casson" (80.4 percent) are found in parishes comprising District 6.[64] According to Forebears.io, the three Louisiana parishes with the greatest concentration of "Casson" persons are Rapides, Natchitoches, and Caddo.[65]

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[61] *McCraw Surname Distribution Map*, FOREBEARS, https://forebears.io/surnames/mccraw (last visited Dec. 17, 2024).

[62] Tom Blake, *Rapides Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (Mar. 2001), https://sites.rootsweb.com/~ajac/larapides.htm.

[63] *See supra* note 53.

[64] *See supra* note 54.

[65] *Casson Surname Distribution Map*, FOREBEARS, https://forebears.io/surnames/casson (last visited Dec. 17, 2024).

In 1860 in Natchitoches Parish, J.B. Cloutier claimed ownership of 83 people.[66] In 1950, there were 17 Black Louisianians with the "Cloutier" surname, and all 17 (100 percent) lived within parishes that constitute District 6.[67] Today the Louisiana parish with the greatest concentration of "Cloutier" persons is Natchitoches.[68]

This evidences a remarkable consistency across time. Settlement conditions established during the 1810s–1840s predictably foretold who would remain in the region, two centuries later. And, as set forth below, the historic roots of the Red River Valley as a community of interest manifest today in common infrastructure, institutions, and shared socioeconomics that support a common set of needs and interests.

III. The Red River Valley Contains Common Economic, Civic, Commercial, and Educational Systems.

A. The Red River and I-49 Transport Corridor.

Throughout the twentieth and twentieth-first centuries, even as the Red River itself has declined as a primary means of travel and transport, the Red River Valley has remained a distinctive region and community. A succession of railroads, highways, and interstates replaced riverboats as the primary conduits connecting peoples, changes that in another region

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[66] Tom Blake, *Natchitoches Parish, Louisiana, Largest Slaveholders from 1860 Slave Census Schedules and Surname Matches for African Americans on 1870 Census*, ROOTSWEB (May 2001), https://sites.rootsweb.com/~ajac/lanatchitoches.htm.

[67] *See supra* note 53.

[68] *Cloutier Surname Distribution Map*, FOREBEARS, https://forebears.io/surnames/cloutier (last visited Dec. 19, 2024).

might have transformed demographic and spatial patterns. However, because all major settlements were originally established along riverways, and because successive generations of engineers prioritized the most efficient routes to link these communities, each new transportation system has mirrored the network originally shaped by the geography of the Atchafalaya-Red River system.

During the 1880s and 1890s, as railroads supplanted riverboats, new rail lines ran parallel to the river in diagonal lines from Shreveport to Baton Rouge, thereby connecting the corridor of communities along the Atchafalaya-Red River system. Today, two of Louisiana's major railroad lines still follow this route.[69]

Later, the Federal Aid Highway Act of 1921 spurred the development of Louisiana's modern highway system.[70] Three years later, Louisiana established Louisiana State Highway 1. As with the railroad, this new highway was also built parallel to the Atchafalaya-Red River, in a diagonal line running between Shreveport and Baton Rouge, so that it would link the preexisting river towns along that long, narrow corridor.[71] During

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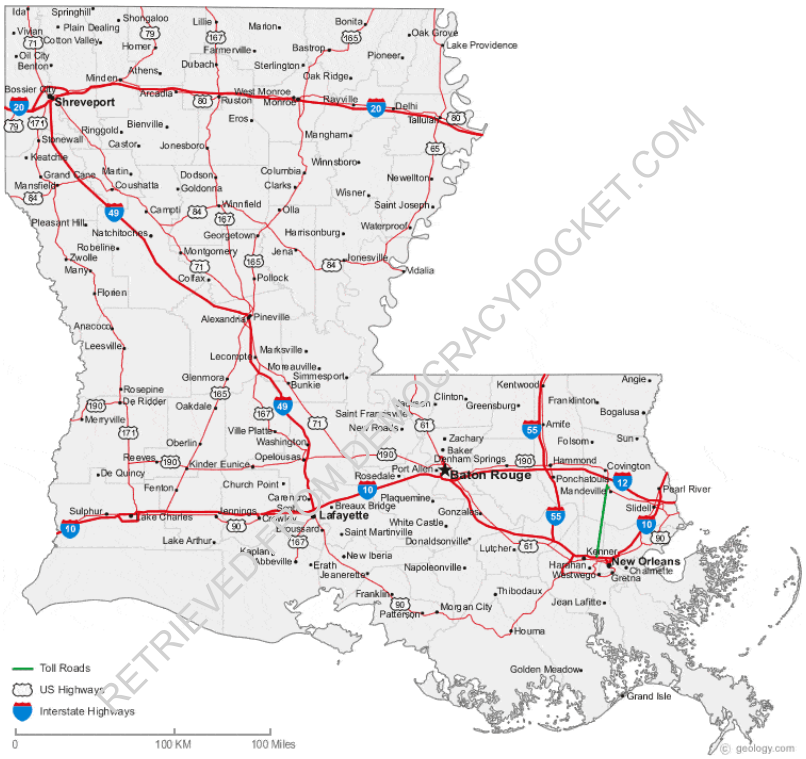
[69] *Alexandria Louisiana Railroads*, ALEXANDRIA, https://www.alexandria-louisiana.com/alexandria-louisiana-railroads.htm (last visited Dec. 12, 2024). For Louisiana's late-nineteenth-century rail network, *see* Rand McNally and Company, *Louisiana*, LIBRARY OF CONGRESS https://www.loc.gov/item/98688489/ (map dates to 1896). For a current railroad map see *Railway Systems Map*, LA. DEP'T OF TRANSP. AND DEV., http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Multimodal/Data_Collection/Mapping/Wall%20Map/RailwaySystems_color.pdf (last visited Dec. 13, 2024).

[70] Stephen W. Stathis, LANDMARK LEGISLATION, 1774-2012: MAJOR U.S. ACTS AND TREATIES 219 (2014).

[71] *Act No. 236, passed 17 July 1924, in* ACTS PASSED BY THE LEGISLATURE OF THE STATE OF LOUISIANA AT THE REGULAR

the latter half of the 20th century, the coherence of the Red River Valley was once again reinforced by the construction of Interstate-49. Approved in 1976, I-49 was, like its predecessors, built parallel to the Atchafalaya-Red River system, in a diagonal line cutting across the state, thereby linking together the river system's historic towns, as shown below.[72]



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SESSION BEGUN AND HELD IN THE CITY OF BATON ROUGE ON THE TWELFTH DAY OF MAY, 1924 at 479 (1924).

[72] Image from Am. Ass'n of State Highway and Transp. Officials, *Route Numbering Committee Agenda 1976-07-13*, *WIKISOURCE,* https://en.wikisource.org/wiki/Route_Numbering_Committee_Agenda_1976-07-13 (last visited Dec. 13, 2024).

In other words, the railroad, highway, and interstate network have each reproduced and reinforced the geographic cohesiveness of the Red River Valley. District 6's boundaries reflect this consistently interconnected region.[73]

B. Regional Civic and Commercial Organizations.

Louisianians have consistently identified the Red River Valley as a distinct region. Today, numerous community organizations, businesses, and lobbying groups claim to represent or serve this region's people, reflecting residents' strong sense of shared identity. The Red River Development Commission, for example, seeks "to promote the region along the Red River in Louisiana as a premier tourist destination, thus building awareness, expanding economic opportunity and strengthening place."[74] Similarly, Louisiana State University's AgCenter operates the "Red River Research Station" outside Shreveport, focusing on the region's specific agricultural needs.[75] The Red River Waterway Commission and the Red River Valley Association address the water management concerns

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[73] Image from *Map of Louisiana Cities and Roads*, GEOLOGY.COM, https://geology.com/cities-map/louisiana.shtml (last visited Dec. 17, 2024).

[74] *Janet Speyrer et al., Red River Development Commission*, LOUISIANA, https://crt.state.la.us/Assets/documentarchive/impact-report/Red%20River.pdf (last visited Dec. 13, 2024).

[75] *Red River Research Station*, LSU AGCENTER, https://www.lsuagcenter.com/portals/our_offices/research_stations/redriver (last visited Dec. 13, 2024).

common to communities along the river.[76] The region's financial needs are served by Red River Bank, a regional community bank whose branches are dispersed between Shreveport, Alexandria, and several of the smaller towns of the Red River Valley.[77]

Geological conditions continue to shape the narrow floodplain's exceptional agricultural fertility, reinforcing the valley's economic distinctiveness from the geologically dissimilar communities surrounding it. For example, Jack Dillard, known regionally as the "Voice of Agriculture," has repeatedly claimed to represent the agricultural interests of the "Red River Valley" during his half-century career as a radio personality, newspaper columnist, and livestock auctioneer.[78] "A trip down (or up) the Red River Valley lets us know the fall of the year has arrived as cotton fields are turning white with the open bolls," Dillard observed in a 2016 newspaper column.[79] In short, the region's agricultural and economic cohesiveness remains very salient to farmers living within the valley.

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[76] RED RIVER WATERWAY COMM'N, https://redriverwaterway.com/ (last visited Dec. 13, 2024); RED RIVER VALLEY ASS'N, https://rrva.org/ (last visited Dec. 13, 2024).

[77] RED RIVER BANK, https://www.redriverbank.net/locations/ (last visited Dec. 13, 2024).

[78] John C. Baker, FARM BROADCASTING: THE FIRST SIXTY YEARS 150 (1981); Terri Richardson, *Thursday is Jack Dillard Day of Appreciation*, MARSHALL NEWS MESSENGER (Marshall, Tex.) (Mar. 30, 2010) https://www.marshallnewsmessenger.com/news/thursday-is-jack-dillard-day-of-appreciation/article_c99812ac-1076-580c-ada2-c2bf8be53f0b.html.

[79] Jack Dillard, *Indicator Fall Is Upon Us, Heritage Harvest Tour Is Too*, SHREVEPORT TIMES (Shreveport, La.), Sept. 18, 2016, at C4.

IV. Red River Valley Populations Share Common Socioeconomic Hardship and Disparities Perpetuated by Common Experiences of Discrimination.

The parishes comprising District 6 are both poor by national standards and poorer than the rest of Louisiana—already the poorest State in the Union.[80] The overall proportion of families living in poverty in these parishes exceeds both the national and the state averages.[81]

Economic hardship in District 6 is deeply marked by racial inequalities. Across the district, the median household income of Black families is about half that of white families. While this disparity is lowest in the most urbanized parishes, it is everywhere substantial.

In West Baton Rouge, for example, the district's wealthiest parish, the median income of white households stands at $95,349, that of Black families at $55,931. The gap is most pronounced in parishes without large cities. In Natchitoches Parish, one of the poorest in the United States, median household income is $41,310, with Black households earning a median of $24,090 compared to $52,040 for white households. In neighboring DeSoto Parish, Black

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[80] *Louisiana Income: All Races*, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov (last visited Dec. 13, 2024); *Poverty rate in the United States in 2023, by state*, STATISTA, https://www.statista.com/statistics/233093/us-poverty-rate-by-state/ (last visited Dec. 17, 2024).

[81] *See* U.S. CENSUS BUREAU, *Table S1702, Poverty Status in the Past 12 Months of Families, 2018–2022 American Community Survey 5-Year Estimates,* https://data.census.gov/table/ACSST5Y2022.S1702?q=poverty%20rate&g=040XX00US22$0500000 (last visited Dec. 22, 2024).

households have a slightly higher median income of $25,452, but the disparity widens as white households earn a median of $65,913.[82] In Avoyelles Parish, a staggering 39.8 percent of Black families live below the poverty line—three times the rate of white families in the same parish. Among white residents, only two parishes, Avoyelles and St. Landry, have poverty rates that exceed the state average.[83]

As with income and poverty, so it is with other indicators of well-being. Residents of District 6 are less educated than the average Louisianian, who is already less educated than the average American. Black residents of the district fare worse in educational attainment than whites in both the state and nation. Only in East Baton Rouge Parish does the percentage of adults with college degrees exceed the national average of 34 percent. In every other parish the proportion fell well below both the national average and Louisiana's state average of 26 percent. Within District 6, Black residents are about half as likely as whites to attain a bachelor's degree. In Pointe Coupée Parish only 6 percent of Black adults aged 25 and older held college degrees; in St. Landry the percentage is 8.3 and in DeSoto 7.2. The corresponding percentages for whites in those three parishes are 17.3, 16.6 and 7.2.[84]

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[82] *Louisiana Income: White and African American*, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov (last visited Dec. 13, 2024).

[83] *Louisiana Poverty: All Races, Whites and African Americans*, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov (last visited Dec. 13, 2024).

[84] U.S. CENSUS BUREAU, *Table S1501, Educational Attainment, 2018-2022 American Community Survey 5-Year Estimates*,

Mortality data tells a similar story: every parish in District 6 has a higher death rate than the national average. Among the white population, only West Baton Rouge has a death rate below the national average, while five parishes exceed the averages for both the state and the nation. In contrast, for Black residents, the death rate exceeds both state and national averages in every parish of the district.[85]

Nowhere is the racial disparity more evident than in the statistics of farm ownership. According to the 2022 Census of Agriculture, Louisiana boasted about 25,000 owner-operated farms, but only two thousand were cultivated by Black owners. White-owned farms were, on average, two and a half times larger than Black-owned farms. In Natchitoches Parish, 92 Black owners operated farms with an average size of 129 acres, compared to 383 white farmers whose farms averaged 428 acres. Among the 485 farm-owners of Pointe Coupée Parish, only 30 were Black; their 80-acre plot average was dwarfed by the 450-acre farm average of their white neighbors.[86]

These disparities have been exacerbated by the U.S. Department of Agriculture ("USDA"), which historically accelerated the decline of smaller Black-owned farms

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https://data.census.gov/table?q=education&g=040XX00US22$0500000 (last visited Dec. 21, 2024).

[85] *Louisiana Education: At Least Bachelor's Degree*, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov (last visited Dec. 13, 2024); *Louisiana Mortality: All Causes of Death*, NAT'L INST. ON MINORITY HEALTH AND HEALTH DISPARITIES: HDPULSE, https://hdpulse.nimhd.nih.gov (last visited Dec. 13, 2024).

[86] U.S. DEP'T OF AGRICULTURE, *Louisiana State and Parish Data, Volume 1: Geographic Area Series, Part 18*, at 3, 665–66, *in* 2022 CENSUS OF AGRICULTURE (2024).

while funneling support to larger, capital-intensive operations typically owned by wealthy white farmers. Despite a 1999 consent decree and the USDA's admission of past discrimination, the number of Black farmers continues to fall in both absolute terms and relative to white farmers. Between 2017 and 2022, the number of Black-owned farms decreased by 4 per cent, compared to a 0.8 per cent decrease in white-owned farms.[87]

The persistent disparities between Black and white populations in District 6 are rooted in a shared history of slavery, segregation, and white supremacy, as described above. During the period of total Black disfranchisement (1898–1944) and partial Black enfranchisement (1944–1965), Black residents had little or no voice in government and were rarely represented politically by members of their own race. White residents systematically excluded Black citizens from entire employment sectors and maintained a total monopoly over law enforcement and the criminal justice system. White officials candidly admitted that they designed public education to deny Black citizens equal economic opportunity. They explicitly tailored education to prepare Black individuals for lives "as a plantation worker, as a tenant farmer, as a farm owner, as a domestic servant, as a laborer . . . [and] as a professional man or woman rendering service to his own race."[88]

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[87] Pete Daniel, DISPOSSESSION: DISCRIMINATION AGAINST AFRICAN AMERICAN FARMERS IN THE AGE OF CIVIL RIGHTS xii (2013); *Pigford v. Glickman*, 185 F.R.D. 82 (D.D.C. 1999) *aff'd*, 206 F.3d 1212 (D.C. Cir. 2000).

[88] Carleton Washburne, LOUISIANA LOOKS AT ITS SCHOOLS: A SUMMARY REPORT OF THE LOUISIANA EDUCATIONAL SURVEY COMMISSION, 105 (1942).

Even after the enactment of the Voting Rights Act of 1965, suffrage access in Louisiana has been repeatedly undermined by efforts to curb Black voters' impact and disrupt communities of interest. Between 1965 and 1989, the U.S. Attorney General issued 66 objection letters—11 to the state and 55 to local governments—nullifying more than 200 discriminatory changes aimed at lessening the political power of Black Louisianians.[89] Furthermore, limited geographic and social mobility within the populations of District 6 has allowed racial disparities, rooted in centuries of history, to persist to modern day.[90]

* * *

The Red River Valley encompassed by District 6 has existed as a distinct region for over two centuries. Contemporary evidence further supports that this region persists as a well-established community of interest. The District Court's disregard of lay witness testimony consistent with this record, and reliance on flawed historical analysis instead, was thus a clear error.

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[89] Richard L. Engstrom et al., *Louisiana*, *in* QUIET REVOLUTION IN THE SOUTH: THE IMPACT OF THE VOTING RIGHTS ACT, 1965–1990 103, 110 (Chandler Davidson & Bernard Grofman eds., 1994).

[90] A 2023 study by the non-partisan think tank the Archbridge Institute ranked Louisiana dead last (50th out of 50) in overall social mobility. *See* Justin T. Callais & Gonzalo Schwarz, *Social Mobility in the 50 States*, ARCHBRIDGE INSTITUTE 463–65 (Dec. 18, 2023), https://www.archbridgeinstitute.org/social-mobility-in-the-50-states/.

CONCLUSION

The judgment of the three-judge district court should be reversed.

Respectfully submitted,

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