

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

PHILLIP CALLAIS, et al.,	)	
	)	Case No. 3:24-cv-00122-DCJ-CES-RRS
Plaintiffs,	)	
	)	
v.	)	District Judge David C. Joseph
	)	Circuit Judge Carl E. Stewart
NANCY LANDRY, IN HER OFFICIAL	)	District Judge Robert R. Summerhays
CAPACITY AS LOUISIANA	)	
SECRETARY OF STATE, et al.,	)	Magistrate Judge Kayla D. McClusky
	)	
Defendants.	)	

**PLAINTIFFS’ RESPONSE TO STATE’S MOTION TO RESET DEADLINES**

Plaintiffs do not object to the State’s Motion to Reset Deadlines, Doc. 302, given the Supreme Court’s recent order in *Allen v. Milligan*, No. 25A1314, 608 U.S. \_\_\_\_ (2026), and Plaintiffs’ understanding of the Secretary of State’s Affidavit, which can be read to effectively set a June 3, 2026, map deadline for the 2026 election—as explained in Plaintiffs’ Response to the Affidavit, Doc. 300. At this apparently late date, the parties must rely on the Secretary’s untested assertions.

Plaintiffs do not, however, waive any argument regarding whether Act 2 fully remedies Plaintiffs’ injuries and complies with *Louisiana v. Callais*, 608 U.S. \_\_\_\_ (2026). Realistically, a complete review of Act 2, including possible discovery and witnesses at trial, in advance of the 2028 election will require substantially more time than the State’s suggested schedule. Nonetheless, Plaintiffs did not oppose the State’s suggested schedule for briefing and argument because it serves as a helpful starting point and provides an opportunity to resolve claims brought by any intervenors that raise issues on election timing or procedure and not Act 2’s constitutionality.

If the Court grants the State's Motion to Reset Deadlines, Plaintiffs will file their application for attorneys' fees incurred to date within three weeks of that order.

Dated this 4th day of June, 2026

PAUL LOY HURD, APLC  
/s/ Paul Loy Hurd  
Paul Loy Hurd  
Louisiana Bar No. 13909  
1896 Hudson Circle, Suite 5  
Monroe, Louisiana 71201  
Tel.: (318) 323-3838  
paul@paulhurdlawoffice.com  
*Attorney for Plaintiffs*

Respectfully submitted,

GRAVES GARRETT GREIM LLC  
/s/ Edward D. Greim  
Edward D. Greim,\* Mo. Bar No. 54034  
Matthew Mueller,\* Mo. Bar No. 70263  
Katherine E. Mitra,\* Mo. Bar No. 74671  
Sarah R. Pineau,\* Mo. Bar No. 74483  
*\*Admitted Pro Hac Vice*  
1100 Main Street, Suite 2700  
Kansas City, Missouri 64105  
Tel.: (816) 256-3181  
Fax: (816) 256-5958  
edgreim@gravesgarrett.com  
mmueller@gravesgarrett.com  
kmitra@gravesgarrett.com  
spineau@gravesgarrett.com  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I do hereby certify that, on this 4th day of June, 2026, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Edward D. Greim  
Edward D. Greim  
*Attorney for Plaintiffs*