

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA

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

Plaintiffs,

v.

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

Defendant.

Civil Action No. 3:24-cv-00122

Circuit Judge Carl E. Stewart

Judge David C. Joseph

Judge Robert R. Summerhays

**ROBINSON AND GALMON INTERVENORS' MOTION TO DISMISS
PLAINTIFFS' COMPLAINT**

The *Robinson* and *Galmon* Intervenor-Defendants (together “Intervenor-Defendants”) respectfully move, pursuant to Federal Rule of Civil Procedure 12(b)(1) to dismiss Plaintiffs’ complaint, Dkt. No. 1, as moot. This Court lacks jurisdiction over Plaintiffs’ claim as no live case or controversy remains, for two reasons:

First, a superseding law, Act 2 of 2026, has repealed and rendered ineffective S.B. 8, the law Plaintiffs challenged, and has remedied the only violation ever adjudicated in this case. Plaintiffs litigated, and this Court and the Supreme Court

adjudicated, a single claim: that District 6 of S.B. 8 was an unconstitutional racial gerrymander. The Legislature has since repealed S.B. 8 and enacted Act 2 in its place, and Plaintiffs concede that Act 2 remedies the racial gerrymander in District 6. Plaintiffs have thus obtained the complete relief they sought on the only claim adjudicated, and the map they challenged no longer exists.

Second, no other live controversy remains, and this Court's remedial authority does not extend to the matters Plaintiffs now seek to raise. This Court never adjudicated Plaintiffs' intentional discrimination claim as to any district and never found District 2 to be a racial gerrymander. A federal court's remedial authority in a redistricting case is limited to curing the violation actually adjudicated, namely, Plaintiffs' racial gerrymandering claim regarding District 6. It does not reach an unproven claim concerning District 2. Accordingly, this Court lacks jurisdiction to adjudicate Plaintiffs' objection to Act 2's District 2.

For the reasons set forth more fully in the accompanying memorandum of law, Intervenor-Defendants respectfully request that the Court dismiss this action as moot.

DATED: June 16, 2026

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

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

Stuart Naifeh (admitted pro hac vice)
Victoria Wenger (admitted pro hac vice)
John S. Cusick (admitted pro hac vice)
Colin Burke (admitted pro hac vice)
NAACP Legal Defense and
Educational Fund, Inc.
40 Rector St., 5th Floor
New York, NY 10006
Tel: (212) 965-2200
snaifeh@naacpldf.org
vwenger@naacpldf.org
jcusick@naacpldf.org
cburke@naacpldf.org

I. Sara Rohani (admitted pro hac vice)
NAACP Legal Defense and
Educational Fund, Inc.
700 14th St. N.W. Ste. 600
Washington, DC 20005
Tel: (202) 682-1300
srohani@naacpldf.org

Robert A. Atkins (admitted pro hac vice)
Yahonnes Cleary (admitted pro hac vice)
Amitav Chakraborty (admitted pro hac vice)
Adam P. Savitt (admitted pro hac vice)
Arielle B. McTootle (admitted pro hac vice)

Respectfully submitted,

By: /s/ John Adcock
John Adcock
Adcock Law LLC
8131 Oak St., Unit 100
New Orleans, LA 70118
Tel: (504) 233-3125
jnadcock@gmail.com

Counsel for the Robinson Intervenors

Sarah Brannon (admitted pro hac vice)
American Civil Liberties Union
Foundation
915 15th St., N.W.
Washington, DC 20005
sbrannon@aclu.org

Sophia Lin Lakin (admitted pro hac vice)
American Civil Liberties Union
Foundation
125 Broad St., 18th Floor
New York, NY 10004
slakin@aclu.org

Nora Ahmed (admitted pro hac vice)
ACLU Foundation of Louisiana
1340 Poydras St., Ste. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
nahmed@laaclu.org

T. Alora Thomas-Lundborg (admitted pro hac vice)
Race and Law Clinic
Harvard Law School
6 Everett St., Ste. 4105
Cambridge, MA 02138
Tel: (617) 495-5202
tthomaslundborg@law.harvard.edu

Robert Klein (admitted pro hac vice)
Paul, Weiss, Rifkind, Wharton & Garrison
LLP 1285 Ave. of the Americas
New York, NY 10019
Tel: (212) 373-3000
Fax: (212) 757-3990
ratkins@paulweiss.com
ycleary@paulweiss.com
achakraborty@paulweiss.com
asavitt@paulweiss.com
amctootle@paulweiss.com
rklein@paulweiss.com

Additional counsel for Robinson Intervenors

* Practice is limited to federal court.

J. E. Cullens, Jr. (LA # 23011)
Andrée Matherne Cullens (LA # 23212)
Stephen Layne Lee (LA # 17689)
WALTERS, THOMAS, CULLENS, LLC
12345 Perkins Road, Bldg. One
Baton Rouge, LA 70810
(225) 236-3636
cullens@lawbr.net
acullens@lawbr.net
laynelee@lawbr.net

/s/ Abha Khanna

Abha Khanna (admitted pro hac vice)
ELIAS LAW GROUP LLP
1700 Seventh Avenue
Suite 2100
Seattle, Washington 98101
(206) 656-0177
AKhanna@elias.law

Lalitha D. Madduri (admitted pro hac vice)
Jacob D. Shelly (admitted pro hac vice)
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW
Suite 400
Washington, D.C. 20001
(202) 968-4490
lmadduri@elias.law
jshelly@elias.law

Counsel for Galmon Intervenors

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 sixteenth day of June, 2026.

/s/ John Adcock

John Adcock

RETRIEVED FROM DEMOCRACYDOCKET.COM