



May 10, 2024

Lyle W. Cayce
Clerk of the Court
U.S. Court of Appeals for the Fifth Circuit
F. Edward Hebert Building
600 S. Maestri Place
New Orleans, LA 70130-3408

Re: *Chisom v. Louisiana ex rel. Landry*, Docket No. 22-30320

Dear Mr. Cayce:

Pursuant to Rule 28(j), Chisom Plaintiffs-Appellees enclose their motion filed with the District Court in light of the recent enactment of Act 7 on May 1, 2024. *See* S.B. 255, 2024 Leg., Reg. Sess. (La. 2024) (“Act 7”), attached hereto as Exhibit A; Enrolled Senate Bill 255 (reflecting Act 7 population data), attached hereto as Exhibit B.

On May 6, Chisom Plaintiffs-Appellees submitted a Rule 28(j) letter to this Court alerting it to Act 7, which redraws Louisiana’s Supreme Court districts and is relevant to the Court’s consideration of the above-captioned matter on appeal. ECF No. 260.

Based on the change in factual circumstances presented by Act 7, Chisom Plaintiffs-Appellees and Intervenor Plaintiff-Appellee Justice Johnson (“Movants”), with the support of the United States, filed a motion with the District Court for an indicative ruling stating that it would grant Movants’ Rule 60(b)(5) Motion to Dissolve the Consent Decree if this Court were to remand the case. *See* Fed. R. Civ. P. 60(b), 62.1. Movants’ motion, memorandum of law, and proposed order are attached hereto as Exhibit C. Defendant-Appellant Attorney General communicated to Movants that she takes no position on their motion at this time.

In light of the foregoing developments, Movants believe that a stay of rehearing en banc and remand to the District Court with instructions to decide Movants’ Rule 60(b)(5) Motion to Dissolve the Consent Decree is warranted.

Respectfully submitted,

s/ Leah C. Aden

William P. Quigley
LOYOLA UNIVERSITY
SCHOOL OF LAW
7214 St. Charles Avenue
New Orleans, Louisiana 70118
Tel. (504) 710-3074
quigley77@gmail.com

Leah C. Aden
Alaizah Koorji
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Tel. (212) 965-7715
laden@naacpldf.org

Ronald L. Wilson
701 Poydras Street, Suite 4100
New Orleans, Louisiana 70139
Tel. (504) 525-4361
cabral2@aol.com

Michael de Leeuw
Amanda Giglio
COZEN O'CONNOR
3 WTC, 175 Greenwich Street
55th Floor
New York, New York 10007
Tel. (212) 908-1131
indeleeuw@cozen.com

Andrew D. Linz
Joan Taylor
COZEN O'CONNOR
Liberty Place, 1650 Market Street
Suite 2800
Philadelphia, Pennsylvania 19103

cc: Counsel for Defendant-Appellant State of Louisiana, ex rel. Jeff Landry
Counsel for Intervenor Plaintiff-Appellee United States of America
Counsel for Intervenor Plaintiff-Appellee Justice Bernette J. Johnson
Counsel for *Amici Curiae*

EXHIBIT A

RETRIEVED FROM DEMOCRACYDOCKET.COM

2024 Regular Session

ACT No. 7

ENROLLED

SENATE BILL NO. 255

BY SENATORS FIELDS AND PRICE AND REPRESENTATIVES ADAMS, BOYD, BRASS, BRYANT, CARPENTER, CARRIER, ROBBY CARTER, WILFORD CARTER, CHASSION, EGAN, FISHER, GADBERRY, HUGHES, JACKSON, JORDAN, KNOX, LAFLEUR, LARVADAIN, LYONS, MARCELLE, MENA, MOORE, NEWELL, SELDERS, STAGNI, TAYLOR, VENTRELLA, WALTERS, WILLARD, WYBLE AND YOUNG

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AN ACT

To enact R.S. 13:101.2 and 101.3 and to repeal R.S. 13:101, 101.1, and 312.4, relative to the supreme court; to implement a settlement in the matter entitled *Louisiana State Conference of the National Association for the Advancement of Colored People, et al. v. State of Louisiana, et al.*, in the United States District Court for the Middle District of Louisiana; to provide for the redistricting of supreme court districts in accordance with the settlement; to provide for the filling of vacancies; to restructure the supreme court by eliminating provisions for a temporary additional judgeship for the Court of Appeal for the Fourth Circuit and such judge's appointment to the supreme court; and to provide for related matters.

Be it enacted by the Legislature of Louisiana:

Section 1. R.S. 13:101.2 and 101.3 are hereby enacted to read as follows:

§101.2. Supreme court districts; justices

The state shall be divided into seven supreme court districts. The supreme court shall be composed of one justice elected from each of the seven districts as set forth below:

(1) District 1 is composed of Livingston Parish; Precincts 9-41C, 9-41D, 9-45 and 9-45A of Orleans Parish; St. Bernard Parish; St. Tammany Parish; Tangipahoa Parish and Washington Parish.

(2) District 2 is composed of Avoyelles Parish; Concordia Parish;

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1 Precincts 1-1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-9, 1-10, 1-11, 1-13, 1-14, 1-15, 1-16, 1-17,
2 1-18, 1-19, 1-20, 1-21, 1-22, 1-23, 1-24, 1-25, 1-26, 1-27, 1-28, 1-29, 1-30, 1-31,
3 1-32, 1-36, 1-37, 1-38, 1-45, 1-46, 1-50, 1-51, 1-52, 1-53, 1-54, 1-55, 1-58, 1-59,
4 1-60, 1-61, 1-62, 1-63, 1-66, 1-67, 1-68, 1-70, 1-71, 1-72, 1-73, 1-77, 1-78, 1-80,
5 1-81, 1-82, 1-83, 1-84, 1-85, 1-86, 1-87, 1-88, 1-91, 1-92, 1-93, 1-94, 1-95, 1-96,
6 1-97, 1-100, 1-101, 1-102, 1-104, 2-1, 2-2, 2-3, 2-4, 2-5, 2-9, 2-10, 2-11, 2-12, 2-13,
7 2-14, 2-15, 2-16, 2-17, 2-18, 2-19, 2-20, 2-21, 2-22, 2-23, 2-24, 2-25, 2-26, 2-27,
8 2-28, 2-29, 2-30, 2-31, 2-32, 2-34, 2-35, 2-36, 2-37, 2-38, 3-8, 3-11, 3-13, 3-18, 3-24,
9 3-27, 3-29, 3-35, 3-39, 3-42, 3-52, 3-54, 3-55, 3-57, 3-58, 3-60, and 3-74 of East
10 Baton Rouge Parish; East Carroll Parish; East Feliciana Parish; Iberville
11 Parish; Precincts 2, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 50, 51, 52,
12 53, 54, 55, 56, 57, 58, 61, 63, 122, and 129 of Lafayette Parish; Madison Parish;
13 Precincts 8, 9, 9A, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 27, 28,
14 30, 65, 65A, 66, 67, 68, 69, 70, 72, 73, 74, and 79 of Ouachita Parish; Pointe
15 Coupee Parish; Precincts C1, C2, C3, C4, C5, C6, C7, C8, C9, C10, C11-A,
16 C11-B, C14, C15, C17, C18, C19, C20, C21, C24, C25, C26, C27, C28, C39, C40,
17 N1, N2, N3, N10, N27, N28, N29, S15, S16, S17, S18, S19, and S20 of Rapides
18 Parish; Richland Parish; St. Helena Parish; Precincts 1, 1A, 1B, 1C, 1D, 2, 2A,
19 2B, 2C, 3, 4A, 4B, 5, 6, 7, 7A, 9, 9A, 11, 11B, 12, 13, 13A, 14, 14A, 14B, 15, 16,
20 16A, 17, 19, 19A, 20, 20B, 21, 21A, 22, 22B, 23, 23A, 26, 26A, 30, 30A, 30B, 31,
21 38, 39, 39A, and 40 of St. Landry Parish; Tensas Parish; West Baton Rouge
22 Parish; and West Feliciana Parish.

23 (3) District 3 is composed of Allen Parish; Beauregard Parish; Precincts
24 2-9, 2-10, 2-11, 2-12, 3-2, 3-3, 3-4, 3-5, 3-6, 3-7, 3-8, 3-9, 4-1, 4-2, 5-1, 5-2, 5-3, 5-4,
25 5-5, 5-6, 5-7, 5-8, 5-9, 5-10, 5-11, 6-1, 6-2, 6-3, 6-4, 6-5, 6-6, 6-7, 6-8, 6-9, 6-10, 7-1,
26 7-2, 7-3, 7-4, 7-5, 7-6, 7-7, 7-8, 7-9, 7-10, 10-3, 10-4, 10-5, 10-6, 10-7, 10-8, 11-1,
27 11-2, 11-3, 11-4, 11-5, 11-6, 11-7, 11-8, 11-9, 11-10, 12-1, 12-2, 12-3, 12-4, 12-5,
28 12-6, 12-7, 12-8, 12-9, 12-10, and 12-11 of Caddo Parish; Calcasieu Parish;
29 Cameron Parish; DeSoto Parish; Evangeline Parish; Jefferson Davis Parish;
30 Natchitoches Parish; Sabine Parish; Precincts 4, 8, 10, 10A, 18, 18A, 18B, 24,

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1 24B, 25, 27, 28, 29, 29A, 32, 32A, 33, 33A, 34, 34A, 35, 36, 37, 37A, 41, 41A, 42,
2 43, 44, 44A, 44B, 45, 46, 47, 48, 49, 50, 50A, 51, 51A, and 52 of St. Landry
3 Parish; and Vernon Parish.

4 (4) District 4 is composed of Bienville Parish; Bossier Parish; Precincts
5 1-1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-7, 1-8, 1-9, 1-10, 1-11, 1-12, 1-13, 1-14, 2-1, 2-2, 2-3,
6 2-4, 2-5, 2-6, 2-7, 2-8, 3-1, 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 8-1, 8-2, 8-3, 8-4,
7 8-5, 8-6, 8-7, 8-8, 8-9, 9-1, 9-2, 9-3, 9-4, 9-5, 9-6, 9-7, 9-8, 9-9, 9-10, 9-11, 9-12,
8 9-13, 10-1, 10-2, and 10-9 of Caddo Parish; Caldwell Parish; Catahoula Parish;
9 Claiborne Parish; Franklin Parish; Grant Parish; Jackson Parish; LaSalle
10 Parish; Lincoln Parish; Morehouse Parish; Precincts 1, 1A, 2, 3, 4, 5, 6, 7, 25,
11 26, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 44A, 45, 46, 47, 48, 49, 50,
12 51, 51A, 52, 52A, 53, 54, 55, 56, 56A, 57, 58, 59, 60, 61, 62, 63, 64, 71, 75, 76, 77,
13 and 78 of Ouachita Parish; Precincts C13, C22, C23, C30, C31, C32, C33, C34,
14 C35, C36, C37-A, C37-B, C38-A, C38-B, C41, C42, N4, N5, N6, N7, N8, N9, N11,
15 N12, N13-A, N13-B, N14-A, N14-B, N15, N16, N17, N18-A, N18-B, N19, N20,
16 N21, N22, N23, N24, N25, N26, S1, S2, S4, S5, S6A, S6B, S7, S8, S9, S10, S11,
17 S13, S14, S21, S22, S23, S24, S25, S26, S27, S28, and S29 of Rapides Parish; Red
18 River Parish; Union Parish; Webster Parish; West Carroll Parish; and Winn
19 Parish.

20 (5) District 5 is composed of Acadia Parish; Iberia Parish; Precincts 1,
21 3, 4, 5, 7, 8, 9, 10, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41,
22 42, 43, 44, 45, 46, 47, 48, 49, 59, 60, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76,
23 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99,
24 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116,
25 117, 118, 119, 120, 121, 123, 124, 125, 126, 127, 128, 130, 131, 133, 134, 135, and
26 136 of Lafayette Parish; Lafourche Parish; St. Martin Parish; St. Mary Parish;
27 Terrebonne Parish; and Vermilion Parish.

28 (6) District 6 is composed of Precincts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13,
29 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 33, 34, 35, 36, 41, 45, 53, 61, 62,
30 63, 64, 68, 69, 71, 72, 73, 76, 77 and 78 of Ascension Parish; Assumption Parish;

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1 Precincts 1-7, 1-8, 1-12, 1-33, 1-34, 1-35, 1-39, 1-40, 1-41, 1-42, 1-43, 1-44, 1-47,
2 1-48, 1-49, 1-56, 1-57, 1-64, 1-65, 1-69, 1-74, 1-75, 1-76, 1-79, 1-89, 1-90, 1-98,
3 1-99, 1-103, 1-105, 1-107, 2-6, 2-7, 2-8, 2-33, 3-1, 3-2, 3-3, 3-4, 3-5, 3-6, 3-7, 3-9,
4 3-10, 3-12, 3-14, 3-15, 3-16, 3-17, 3-19, 3-20, 3-21, 3-22, 3-23, 3-25, 3-26, 3-28,
5 3-30, 3-31, 3-32, 3-33, 3-34, 3-36, 3-37, 3-38, 3-40, 3-41, 3-43, 3-44, 3-45, 3-46,
6 3-47, 3-48, 3-49, 3-50, 3-51, 3-53, 3-56, 3-59, 3-61, 3-62, 3-63, 3-64, 3-65, 3-66,
7 3-67, 3-68, 3-69, 3-70, 3-71, 3-72, 3-73, 3-75 and 3-76 of East Baton Rouge
8 Parish; Precincts 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21,
9 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44,
10 45, 46, 51, 52, 53, 54, 55, 56, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72,
11 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95,
12 96, 97, 98, 99, 100, 101, 102, 103, 105, 106, 116, 117, 118, 119, 120, 121, 122, 123,
13 124, 125A, 125B, 126, 127, 128, 129, 130, 132, 176, 177, 178, 183, 184, 185A, 189,
14 190, 194B, 202, 203, 210, 211, 229, 234, 246, 247, 248, 1-G, 3-G, 5-G, 9-G, 10-G,
15 12-G, 13-G, 1-GI, 1-H, 2-H, 3-H, 4-H, 5-H, 6-H, 7-H, 8-H, 9-H, 1-K, 2-K, 3-K,
16 4-K, 5-K, 6-KA, 6-KB, 7-KA, 7-KB, 8-K, 9-K, 10-K, 11-K, 12-K, 13-KA, 14-K,
17 15-K, 16-K, 17-K, 18-K, 19-K, 20-K, 25-K, 27-K, 34-K, 35-K and 1-L of
18 Jefferson Parish; Precincts 4-7, 4-8, 4-9, 4-11, 4-14, 4-15, 4-17, 4-17A, 4-18, 4-20,
19 4-21, 4-22, 4-23, 5-12, 5-13, 5-15, 5-16, 5-17, 5-18, 17-17, 17-18, 17-18A, 17-19
20 and 17-20 of Orleans Parish; Plaquemines Parish; Precincts 1-6, 2-5, 2-6, 3-1,
21 3-2, 3-3, 4-1, 4-2, 4-3, 4-5, 5-5, 6-1, 6-2, 6-3, 6-4, 6-6, 6-8, 7-1, 7-2 and 7-3 of St.
22 Charles Parish; Precincts 13, 14 and 18 of St. James Parish and Precincts 1-1,
23 1-6, 2-1, 2-3, 3-3, 5-4 and 5-5 of St. John the Baptist Parish.

24 (7) District 7 is composed of Precincts 28, 30, 31, 32, 37, 38, 39, 40, 42, 43,
25 44, 47, 48, 50, 51, 52, 54, 55, 57, 58, 65, and 66 of Ascension Parish; Precincts 57,
26 104, 108, 115, 131, 133, 134, 136, 138, 150, 151, 152, 153, 154, 155, 156, 157A,
27 157B, 170, 171, 172, 173, 174, 175, 179A, 179B, 180, 181, 182, 185B, 187, 188,
28 191, 192, 193A, 193B, 194A, 195, 196, 197A, 197B, 198, 199, 200, 201, 204, 205,
29 212, 213A, 213B, 213C, 214A, 214B, 215, 216A, 216B, 216C, 217, 225, 226, 227,
30 228, 230, 231, 232A, 232B, 235, 236, 237, 238A, 238B, 2-G, 4-G, 6-G, 7-G, 8-G,

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ENROLLED

1 11-G, 13-KB, 21-K, 22-K, 23-K, 24-K, 26-K, 28-K, 29-K, 30-K, 31-K, 33-K, 1-W,
2 2-W, 3-W, 4-W, 5-W, 6-W, and 7-W of Jefferson Parish; Precincts 1-1, 1-2, 1-5,
3 1-6, 2-1, 2-2, 2-4, 2-6, 2-7, 3-1, 3-8, 3-9, 3-12, 3-14, 3-15, 3-18, 3-19, 3-20, 4-2, 4-3,
4 4-6, 5-1, 5-2, 5-3, 5-5, 5-7, 5-8, 5-9, 5-10, 5-11, 6-1, 6-2, 6-4, 6-6, 6-7, 6-8, 6-9, 7-1,
5 7-2, 7-4, 7-5, 7-6, 7-7, 7-8, 7-9A, 7-10, 7-11, 7-12, 7-13, 7-14, 7-15, 7-16, 7-17,
6 7-18, 7-19, 7-20, 7-21, 7-23, 7-24, 7-25, 7-25A, 7-26, 7-27, 7-27B, 7-28, 7-28A,
7 7-29, 7-30, 7-32, 7-33, 7-35, 7-37, 7-37A, 7-40, 7-41, 7-42, 8-1, 8-2, 8-4, 8-6, 8-7,
8 8-8, 8-9, 8-12, 8-13, 8-14, 8-15, 8-19, 8-20, 8-21, 8-22, 8-23, 8-24, 8-25, 8-26, 8-27,
9 8-28, 8-30, 9-1, 9-3, 9-4, 9-5, 9-6, 9-7, 9-8, 9-9, 9-10, 9-11, 9-12, 9-13, 9-14, 9-15,
10 9-16, 9-17, 9-19, 9-21, 9-23, 9-25, 9-26, 9-28, 9-28C, 9-29, 9-30, 9-30A, 9-31,
11 9-31A, 9-31B, 9-31D, 9-32, 9-33, 9-34A, 9-35, 9-35A, ~~9-36~~, 9-36B, 9-37, 9-38,
12 9-38A, 9-39, 9-39B, 9-40, 9-40A, 9-40C, 9-41, 9-41A, 9-41B, 9-42, 9-42C, 9-43A,
13 9-43B, 9-43C, 9-43E, 9-43F, 9-43G, 9-43H, ~~9-43I~~, 9-43J, 9-43K, 9-43L, 9-43M,
14 9-43N, 9-44, 9-44A, 9-44B, 9-44D, ~~9-44E~~, 9-44F, 9-44G, 9-44I, 9-44J, 9-44L,
15 9-44M, 9-44N, 9-44O, 9-44P, 9-44Q, 10-3, 10-6, 10-7, 10-8, 10-9, 10-11, 10-12,
16 10-13, 10-14, 11-2, 11-3, ~~11-4~~, 11-5, 11-8, 11-9, 11-10, 11-11, 11-12, 11-13, 11-14,
17 11-17, 12-1, 12-2, 12-3, 12-4, 12-5, 12-6, 12-7, 12-9, 12-10, 12-11, 12-12, 12-13,
18 12-14, 12-16, ~~12-17~~, 12-19, 13-1, 13-2, 13-3, 13-4, 13-5, 13-6, 13-7, 13-8, 13-9,
19 13-10, ~~13-11~~, 13-12, 13-13, 13-14, 13-15, 13-16, 14-1, 14-2, 14-3, 14-4, 14-5, 14-6,
20 14-7, ~~14-8~~, 14-9, 14-10, 14-11, 14-12, 14-13A, 14-14, 14-15, 14-16, 14-17, 14-18A,
21 14-19, 14-20, 14-21, 14-23, 14-24A, 14-25, 14-26, 15-1, 15-2, 15-3, 15-5, 15-6,
22 15-8, 15-9, 15-10, 15-11, 15-12, 15-12A, 15-13, 15-13A, 15-13B, 15-14, 15-14A,
23 15-14B, 15-14C, 15-14D, 15-14E, 15-14F, 15-14G, 15-15, 15-15A, 15-15B, 15-16,
24 15-17, 15-17A, 15-17B, 15-18, 15-18A, 15-18B, 15-18C, 15-18D, 15-18E, 15-18F,
25 15-19, 15-19A, 15-19B, 15-19C, 16-1, 16-1A, 16-2, 16-3, 16-4, 16-5, 16-6, 16-7,
26 16-8, 16-9, 17-1, 17-2, 17-3, 17-4, 17-5, 17-6, 17-7, 17-8, 17-9, 17-10, 17-11, 17-12,
27 17-13, 17-13A, 17-14, 17-15, and 17-16 of Orleans Parish; Precincts 1-1, 1-2, 1-3,
28 1-4, 1-5, 2-1, 2-3, 2-4, 4-4, 5-1, 5-3, 5-4, 7-4, 7-5, and 7-6 of St. Charles Parish;
29 Precincts 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 19, 22, and 23 of St. James
30 Parish; and Precincts 1-2, 1-3, 1-4, 1-5, 1-7, 2-2, 2-4, 2-5, 3-1, 3-2, 3-4, 3-7, 4-1,

SB NO. 255

ENROLLED

1 4-2, 4-3, 4-4, 4-5, 5-1, 5-2, 5-3, 6-1, 6-2, 6-3, 6-4, 6-5, 7-1, 7-2, 7-3, and 7-4 of St.
2 John the Baptist Parish.

3 §101.3. Assignment of districts; vacancies; elections

4 A. Each justice of the supreme court in office on the effective date of this
5 Section shall be assigned to the district composed as provided by R.S. 13:101.2
6 having the same designation as the district from which the justice was elected
7 and may complete the term for which he was elected.

8 B. The successor to the office of justice of the supreme court shall be
9 elected from the district assigned to that office as provided by Subsection A of
10 this Section. The election shall be from the district composed as provided by
11 R.S. 13:101.2.

12 Section 2. R.S. 13:101, 101.1, and 312.4 are hereby repealed.

13 Section 3.(A) The precincts referenced in this Act are those contained in the file
14 named "2024 Precinct Shapefiles (01-10-2024)" available on the Legislature of Louisiana's
15 website on the effective date of this Section. The 2024 Precinct Shapefiles are based upon
16 those Voting Districts (VTDs) contained in the 2020 Census Redistricting TIGER/Line
17 Shapefiles for the State of Louisiana as those files have been modified and validated through
18 the data verification program of the Louisiana House of Representatives and the Louisiana
19 Senate to represent precinct changes submitted through January 10, 2024, to the Legislature
20 of Louisiana by parish governing authorities pursuant to the provisions of R.S. 18:532 and
21 532.1.

22 (B) When a precinct referenced in this Act has been subdivided by action of the
23 parish governing authority on a nongeographic basis or subdivided by action of the parish
24 governing authority on a geographic basis in accordance with the provisions of R.S.
25 18:532.1, the enumeration in this Act of the general precinct designation shall include all
26 nongeographic and all geographic subdivisions thereof, however such subdivisions may be
27 designated.

28 (C) The territorial limits of the districts as provided in this Act shall continue in
29 effect until changed by law regardless of any subsequent change made to the precincts by
30 the parish governing authority.

SB NO. 255

ENROLLED

1 Section 4. The purpose and intent of this Act is to statutorily effectuate and
2 implement a settlement reached between all parties in the matter entitled *Louisiana State*
3 *Conference of the National Association for the Advancement of Colored People, et al. v.*
4 *State of Louisiana, et al.*, Case 3:19-479, in the United States District Court for the Middle
5 District of Louisiana.

6 Section 5. This Act shall become effective upon signature of the governor or, if not
7 signed by the governor, upon expiration of the time for bills to become law without signature
8 by the governor, as provided in Article III, Section 18 of the Constitution of Louisiana. If
9 this Act is vetoed by the governor and subsequently approved by the legislature, the
10 provisions of this Act shall become effective on the day following such approval.

PRESIDENT OF THE SENATE

SPEAKER OF THE HOUSE OF REPRESENTATIVES

GOVERNOR OF THE STATE OF LOUISIANA

APPROVED: _____

EXHIBIT B

RETRIEVED FROM DEMOCRACYDOCKET.COM

2024 Regular Session

ENROLLED

SENATE BILL NO. 255

BY SENATORS FIELDS AND PRICE AND REPRESENTATIVES ADAMS, BOYD, BRASS, BRYANT, CARPENTER, CARRIER, ROBBY CARTER, WILFORD CARTER, CHASSION, EGAN, FISHER, GADBERRY, HUGHES, JACKSON, JORDAN, KNOX, LAFLEUR, LARVADAIN, LYONS, MARCELLE, MENA, MOORE, NEWELL, SELDERS, STAGNI, TAYLOR, VENTRELLA, WALTERS, WILLARD, WYBLE AND YOUNG

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AN ACT

To enact R.S. 13:101.2 and 101.3 and to repeal R.S. 13:101, 101.1, and 312.4, relative to the supreme court; to implement a settlement in the matter entitled *Louisiana State Conference of the National Association for the Advancement of Colored People, et al. v. State of Louisiana, et al.*, in the United States District Court for the Middle District of Louisiana; to provide for the redistricting of supreme court districts in accordance with the settlement; to provide for the filling of vacancies; to restructure the supreme court by eliminating provisions for a temporary additional judgeship for the Court of Appeal for the Fourth Circuit and such judge's appointment to the supreme court; and to provide for related matters.

Be it enacted by the Legislature of Louisiana:

Section 1. R.S. 13:101.2 and 101.3 are hereby enacted to read as follows:

§101.2. Supreme court districts; justices

The state shall be divided into seven supreme court districts. The supreme court shall be composed of one justice elected from each of the seven districts as set forth below:

(1) District 1 is composed of Livingston Parish; Precincts 9-41C, 9-41D, 9-45 and 9-45A of Orleans Parish; St. Bernard Parish; St. Tammany Parish; Tangipahoa Parish and Washington Parish.

(2) District 2 is composed of Avoyelles Parish; Concordia Parish;

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1 Precincts 1-1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-9, 1-10, 1-11, 1-13, 1-14, 1-15, 1-16, 1-17,
2 1-18, 1-19, 1-20, 1-21, 1-22, 1-23, 1-24, 1-25, 1-26, 1-27, 1-28, 1-29, 1-30, 1-31,
3 1-32, 1-36, 1-37, 1-38, 1-45, 1-46, 1-50, 1-51, 1-52, 1-53, 1-54, 1-55, 1-58, 1-59,
4 1-60, 1-61, 1-62, 1-63, 1-66, 1-67, 1-68, 1-70, 1-71, 1-72, 1-73, 1-77, 1-78, 1-80,
5 1-81, 1-82, 1-83, 1-84, 1-85, 1-86, 1-87, 1-88, 1-91, 1-92, 1-93, 1-94, 1-95, 1-96,
6 1-97, 1-100, 1-101, 1-102, 1-104, 2-1, 2-2, 2-3, 2-4, 2-5, 2-9, 2-10, 2-11, 2-12, 2-13,
7 2-14, 2-15, 2-16, 2-17, 2-18, 2-19, 2-20, 2-21, 2-22, 2-23, 2-24, 2-25, 2-26, 2-27,
8 2-28, 2-29, 2-30, 2-31, 2-32, 2-34, 2-35, 2-36, 2-37, 2-38, 3-8, 3-11, 3-13, 3-18, 3-24,
9 3-27, 3-29, 3-35, 3-39, 3-42, 3-52, 3-54, 3-55, 3-57, 3-58, 3-60, and 3-74 of East
10 Baton Rouge Parish; East Carroll Parish; East Feliciana Parish; Iberville
11 Parish; Precincts 2, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 50, 51, 52,
12 53, 54, 55, 56, 57, 58, 61, 63, 122, and 129 of Lafayette Parish; Madison Parish;
13 Precincts 8, 9, 9A, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 27, 28,
14 30, 65, 65A, 66, 67, 68, 69, 70, 72, 73, 74, and 79 of Ouachita Parish; Pointe
15 Coupee Parish; Precincts C1, C2, C3, C4, C5, C6, C7, C8, C9, C10, C11-A,
16 C11-B, C14, C15, C17, C18, C19, C20, C21, C24, C25, C26, C27, C28, C39, C40,
17 N1, N2, N3, N10, N27, N28, N29, S15, S16, S17, S18, S19, and S20 of Rapides
18 Parish; Richland Parish; St. Helena Parish; Precincts 1, 1A, 1B, 1C, 1D, 2, 2A,
19 2B, 2C, 3, 4A, 4B, 5, 6, 7, 7A, 9, 9A, 11, 11B, 12, 13, 13A, 14, 14A, 14B, 15, 16,
20 16A, 17, 19, 19A, 20, 20B, 21, 21A, 22, 22B, 23, 23A, 26, 26A, 30, 30A, 30B, 31,
21 38, 39, 39A, and 40 of St. Landry Parish; Tensas Parish; West Baton Rouge
22 Parish; and West Feliciana Parish.

23 (3) District 3 is composed of Allen Parish; Beauregard Parish; Precincts
24 2-9, 2-10, 2-11, 2-12, 3-2, 3-3, 3-4, 3-5, 3-6, 3-7, 3-8, 3-9, 4-1, 4-2, 5-1, 5-2, 5-3, 5-4,
25 5-5, 5-6, 5-7, 5-8, 5-9, 5-10, 5-11, 6-1, 6-2, 6-3, 6-4, 6-5, 6-6, 6-7, 6-8, 6-9, 6-10, 7-1,
26 7-2, 7-3, 7-4, 7-5, 7-6, 7-7, 7-8, 7-9, 7-10, 10-3, 10-4, 10-5, 10-6, 10-7, 10-8, 11-1,
27 11-2, 11-3, 11-4, 11-5, 11-6, 11-7, 11-8, 11-9, 11-10, 12-1, 12-2, 12-3, 12-4, 12-5,
28 12-6, 12-7, 12-8, 12-9, 12-10, and 12-11 of Caddo Parish; Calcasieu Parish;
29 Cameron Parish; DeSoto Parish; Evangeline Parish; Jefferson Davis Parish;
30 Natchitoches Parish; Sabine Parish; Precincts 4, 8, 10, 10A, 18, 18A, 18B, 24,

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1 24B, 25, 27, 28, 29, 29A, 32, 32A, 33, 33A, 34, 34A, 35, 36, 37, 37A, 41, 41A, 42,
2 43, 44, 44A, 44B, 45, 46, 47, 48, 49, 50, 50A, 51, 51A, and 52 of St. Landry
3 Parish; and Vernon Parish.

4 (4) District 4 is composed of Bienville Parish; Bossier Parish; Precincts
5 1-1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-7, 1-8, 1-9, 1-10, 1-11, 1-12, 1-13, 1-14, 2-1, 2-2, 2-3,
6 2-4, 2-5, 2-6, 2-7, 2-8, 3-1, 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 8-1, 8-2, 8-3, 8-4,
7 8-5, 8-6, 8-7, 8-8, 8-9, 9-1, 9-2, 9-3, 9-4, 9-5, 9-6, 9-7, 9-8, 9-9, 9-10, 9-11, 9-12,
8 9-13, 10-1, 10-2, and 10-9 of Caddo Parish; Caldwell Parish; Catahoula Parish;
9 Claiborne Parish; Franklin Parish; Grant Parish; Jackson Parish; LaSalle
10 Parish; Lincoln Parish; Morehouse Parish; Precincts 1, 1A, 2, 3, 4, 5, 6, 7, 25,
11 26, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 44A, 45, 46, 47, 48, 49, 50,
12 51, 51A, 52, 52A, 53, 54, 55, 56, 56A, 57, 58, 59, 60, 61, 62, 63, 64, 71, 75, 76, 77,
13 and 78 of Ouachita Parish; Precincts C13, C22, C23, C30, C31, C32, C33, C34,
14 C35, C36, C37-A, C37-B, C38-A, C38-B, C41, C42, N4, N5, N6, N7, N8, N9, N11,
15 N12, N13-A, N13-B, N14-A, N14-B, N15, N16, N17, N18-A, N18-B, N19, N20,
16 N21, N22, N23, N24, N25, N26, S1, S2, S4, S5, S6A, S6B, S7, S8, S9, S10, S11,
17 S13, S14, S21, S22, S23, S24, S25, S26, S27, S28, and S29 of Rapides Parish; Red
18 River Parish; Union Parish; Webster Parish; West Carroll Parish; and Winn
19 Parish.

20 (5) District 5 is composed of Acadia Parish; Iberia Parish; Precincts 1,
21 3, 4, 5, 7, 8, 9, 10, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41,
22 42, 43, 44, 45, 46, 47, 48, 49, 59, 60, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76,
23 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99,
24 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116,
25 117, 118, 119, 120, 121, 123, 124, 125, 126, 127, 128, 130, 131, 133, 134, 135, and
26 136 of Lafayette Parish; Lafourche Parish; St. Martin Parish; St. Mary Parish;
27 Terrebonne Parish; and Vermilion Parish.

28 (6) District 6 is composed of Precincts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13,
29 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 33, 34, 35, 36, 41, 45, 53, 61, 62,
30 63, 64, 68, 69, 71, 72, 73, 76, 77 and 78 of Ascension Parish; Assumption Parish;

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1 Precincts 1-7, 1-8, 1-12, 1-33, 1-34, 1-35, 1-39, 1-40, 1-41, 1-42, 1-43, 1-44, 1-47,
2 1-48, 1-49, 1-56, 1-57, 1-64, 1-65, 1-69, 1-74, 1-75, 1-76, 1-79, 1-89, 1-90, 1-98,
3 1-99, 1-103, 1-105, 1-107, 2-6, 2-7, 2-8, 2-33, 3-1, 3-2, 3-3, 3-4, 3-5, 3-6, 3-7, 3-9,
4 3-10, 3-12, 3-14, 3-15, 3-16, 3-17, 3-19, 3-20, 3-21, 3-22, 3-23, 3-25, 3-26, 3-28,
5 3-30, 3-31, 3-32, 3-33, 3-34, 3-36, 3-37, 3-38, 3-40, 3-41, 3-43, 3-44, 3-45, 3-46,
6 3-47, 3-48, 3-49, 3-50, 3-51, 3-53, 3-56, 3-59, 3-61, 3-62, 3-63, 3-64, 3-65, 3-66,
7 3-67, 3-68, 3-69, 3-70, 3-71, 3-72, 3-73, 3-75 and 3-76 of East Baton Rouge
8 Parish; Precincts 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21,
9 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44,
10 45, 46, 51, 52, 53, 54, 55, 56, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72,
11 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95,
12 96, 97, 98, 99, 100, 101, 102, 103, 105, 106, 116, 117, 118, 119, 120, 121, 122, 123,
13 124, 125A, 125B, 126, 127, 128, 129, 130, 132, 176, 177, 178, 183, 184, 185A, 189,
14 190, 194B, 202, 203, 210, 211, 229, 234, 246, 247, 248, 1-G, 3-G, 5-G, 9-G, 10-G,
15 12-G, 13-G, 1-GI, 1-H, 2-H, 3-H, 4-H, 5-H, 6-H, 7-H, 8-H, 9-H, 1-K, 2-K, 3-K,
16 4-K, 5-K, 6-KA, 6-KB, 7-KA, 7-KB, 8-K, 9-K, 10-K, 11-K, 12-K, 13-KA, 14-K,
17 15-K, 16-K, 17-K, 18-K, 19-K, 20-K, 25-K, 27-K, 34-K, 35-K and 1-L of
18 Jefferson Parish; Precincts 4-7, 4-8, 4-9, 4-11, 4-14, 4-15, 4-17, 4-17A, 4-18, 4-20,
19 4-21, 4-22, 4-23, 5-12, 5-13, 5-15, 5-16, 5-17, 5-18, 17-17, 17-18, 17-18A, 17-19
20 and 17-20 of Orleans Parish; Plaquemines Parish; Precincts 1-6, 2-5, 2-6, 3-1,
21 3-2, 3-3, 4-1, 4-2, 4-3, 4-5, 5-5, 6-1, 6-2, 6-3, 6-4, 6-6, 6-8, 7-1, 7-2 and 7-3 of St.
22 Charles Parish; Precincts 13, 14 and 18 of St. James Parish and Precincts 1-1,
23 1-6, 2-1, 2-3, 3-3, 5-4 and 5-5 of St. John the Baptist Parish.

24 (7) District 7 is composed of Precincts 28, 30, 31, 32, 37, 38, 39, 40, 42, 43,
25 44, 47, 48, 50, 51, 52, 54, 55, 57, 58, 65, and 66 of Ascension Parish; Precincts 57,
26 104, 108, 115, 131, 133, 134, 136, 138, 150, 151, 152, 153, 154, 155, 156, 157A,
27 157B, 170, 171, 172, 173, 174, 175, 179A, 179B, 180, 181, 182, 185B, 187, 188,
28 191, 192, 193A, 193B, 194A, 195, 196, 197A, 197B, 198, 199, 200, 201, 204, 205,
29 212, 213A, 213B, 213C, 214A, 214B, 215, 216A, 216B, 216C, 217, 225, 226, 227,
30 228, 230, 231, 232A, 232B, 235, 236, 237, 238A, 238B, 2-G, 4-G, 6-G, 7-G, 8-G,

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1 11-G, 13-KB, 21-K, 22-K, 23-K, 24-K, 26-K, 28-K, 29-K, 30-K, 31-K, 33-K, 1-W,
2 2-W, 3-W, 4-W, 5-W, 6-W, and 7-W of Jefferson Parish; Precincts 1-1, 1-2, 1-5,
3 1-6, 2-1, 2-2, 2-4, 2-6, 2-7, 3-1, 3-8, 3-9, 3-12, 3-14, 3-15, 3-18, 3-19, 3-20, 4-2, 4-3,
4 4-6, 5-1, 5-2, 5-3, 5-5, 5-7, 5-8, 5-9, 5-10, 5-11, 6-1, 6-2, 6-4, 6-6, 6-7, 6-8, 6-9, 7-1,
5 7-2, 7-4, 7-5, 7-6, 7-7, 7-8, 7-9A, 7-10, 7-11, 7-12, 7-13, 7-14, 7-15, 7-16, 7-17,
6 7-18, 7-19, 7-20, 7-21, 7-23, 7-24, 7-25, 7-25A, 7-26, 7-27, 7-27B, 7-28, 7-28A,
7 7-29, 7-30, 7-32, 7-33, 7-35, 7-37, 7-37A, 7-40, 7-41, 7-42, 8-1, 8-2, 8-4, 8-6, 8-7,
8 8-8, 8-9, 8-12, 8-13, 8-14, 8-15, 8-19, 8-20, 8-21, 8-22, 8-23, 8-24, 8-25, 8-26, 8-27,
9 8-28, 8-30, 9-1, 9-3, 9-4, 9-5, 9-6, 9-7, 9-8, 9-9, 9-10, 9-11, 9-12, 9-13, 9-14, 9-15,
10 9-16, 9-17, 9-19, 9-21, 9-23, 9-25, 9-26, 9-28, 9-28C, 9-29, 9-30, 9-30A, 9-31,
11 9-31A, 9-31B, 9-31D, 9-32, 9-33, 9-34A, 9-35, 9-35A, 9-36, 9-36B, 9-37, 9-38,
12 9-38A, 9-39, 9-39B, 9-40, 9-40A, 9-40C, 9-41, 9-41A, 9-41B, 9-42, 9-42C, 9-43A,
13 9-43B, 9-43C, 9-43E, 9-43F, 9-43G, 9-43H, 9-43I, 9-43J, 9-43K, 9-43L, 9-43M,
14 9-43N, 9-44, 9-44A, 9-44B, 9-44D, 9-44E, 9-44F, 9-44G, 9-44I, 9-44J, 9-44L,
15 9-44M, 9-44N, 9-44O, 9-44P, 9-44Q, 10-3, 10-6, 10-7, 10-8, 10-9, 10-11, 10-12,
16 10-13, 10-14, 11-2, 11-3, 11-4, 11-5, 11-8, 11-9, 11-10, 11-11, 11-12, 11-13, 11-14,
17 11-17, 12-1, 12-2, 12-3, 12-4, 12-5, 12-6, 12-7, 12-9, 12-10, 12-11, 12-12, 12-13,
18 12-14, 12-16, 12-17, 12-19, 13-1, 13-2, 13-3, 13-4, 13-5, 13-6, 13-7, 13-8, 13-9,
19 13-10, 13-11, 13-12, 13-13, 13-14, 13-15, 13-16, 14-1, 14-2, 14-3, 14-4, 14-5, 14-6,
20 14-7, 14-8, 14-9, 14-10, 14-11, 14-12, 14-13A, 14-14, 14-15, 14-16, 14-17, 14-18A,
21 14-19, 14-20, 14-21, 14-23, 14-24A, 14-25, 14-26, 15-1, 15-2, 15-3, 15-5, 15-6,
22 15-8, 15-9, 15-10, 15-11, 15-12, 15-12A, 15-13, 15-13A, 15-13B, 15-14, 15-14A,
23 15-14B, 15-14C, 15-14D, 15-14E, 15-14F, 15-14G, 15-15, 15-15A, 15-15B, 15-16,
24 15-17, 15-17A, 15-17B, 15-18, 15-18A, 15-18B, 15-18C, 15-18D, 15-18E, 15-18F,
25 15-19, 15-19A, 15-19B, 15-19C, 16-1, 16-1A, 16-2, 16-3, 16-4, 16-5, 16-6, 16-7,
26 16-8, 16-9, 17-1, 17-2, 17-3, 17-4, 17-5, 17-6, 17-7, 17-8, 17-9, 17-10, 17-11, 17-12,
27 17-13, 17-13A, 17-14, 17-15, and 17-16 of Orleans Parish; Precincts 1-1, 1-2, 1-3,
28 1-4, 1-5, 2-1, 2-3, 2-4, 4-4, 5-1, 5-3, 5-4, 7-4, 7-5, and 7-6 of St. Charles Parish;
29 Precincts 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 19, 22, and 23 of St. James
30 Parish; and Precincts 1-2, 1-3, 1-4, 1-5, 1-7, 2-2, 2-4, 2-5, 3-1, 3-2, 3-4, 3-7, 4-1,

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1 4-2, 4-3, 4-4, 4-5, 5-1, 5-2, 5-3, 6-1, 6-2, 6-3, 6-4, 6-5, 7-1, 7-2, 7-3, and 7-4 of St.
2 John the Baptist Parish.

3 §101.3. Assignment of districts; vacancies; elections

4 A. Each justice of the supreme court in office on the effective date of this
5 Section shall be assigned to the district composed as provided by R.S. 13:101.2
6 having the same designation as the district from which the justice was elected
7 and may complete the term for which he was elected.

8 B. The successor to the office of justice of the supreme court shall be
9 elected from the district assigned to that office as provided by Subsection A of
10 this Section. The election shall be from the district composed as provided by
11 R.S. 13:101.2.

12 Section 2. R.S. 13:101, 101.1, and 312.4 are hereby repealed.

13 Section 3.(A) The precincts referenced in this Act are those contained in the file
14 named "2024 Precinct Shapefiles (01-10-2024)" available on the Legislature of Louisiana's
15 website on the effective date of this Section. The 2024 Precinct Shapefiles are based upon
16 those Voting Districts (VTDs) contained in the 2020 Census Redistricting TIGER/Line
17 Shapefiles for the State of Louisiana as those files have been modified and validated through
18 the data verification program of the Louisiana House of Representatives and the Louisiana
19 Senate to represent precinct changes submitted through January 10, 2024, to the Legislature
20 of Louisiana by parish governing authorities pursuant to the provisions of R.S. 18:532 and
21 532.1.

22 (B) When a precinct referenced in this Act has been subdivided by action of the
23 parish governing authority on a nongeographic basis or subdivided by action of the parish
24 governing authority on a geographic basis in accordance with the provisions of R.S.
25 18:532.1, the enumeration in this Act of the general precinct designation shall include all
26 nongeographic and all geographic subdivisions thereof, however such subdivisions may be
27 designated.

28 (C) The territorial limits of the districts as provided in this Act shall continue in
29 effect until changed by law regardless of any subsequent change made to the precincts by
30 the parish governing authority.

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1 Section 4. The purpose and intent of this Act is to statutorily effectuate and
2 implement a settlement reached between all parties in the matter entitled *Louisiana State*
3 *Conference of the National Association for the Advancement of Colored People, et al. v.*
4 *State of Louisiana, et al.*, Case 3:19-479, in the United States District Court for the Middle
5 District of Louisiana.

6 Section 5. This Act shall become effective upon signature of the governor or, if not
7 signed by the governor, upon expiration of the time for bills to become law without signature
8 by the governor, as provided in Article III, Section 18 of the Constitution of Louisiana. If
9 this Act is vetoed by the governor and subsequently approved by the legislature, the
10 provisions of this Act shall become effective on the day following such approval.

PRESIDENT OF THE SENATE

SPEAKER OF THE HOUSE OF REPRESENTATIVES

GOVERNOR OF THE STATE OF LOUISIANA

APPROVED: _____

Plan Statistics

Plan: Senate Bill 255 Enrolled (Fields)

<u>Districts:</u>	<u># of Members</u>	<u>Actual Population</u>	<u>Ideal Population</u>	<u>Absolute Deviation</u>	<u>Relative Deviation</u>
District 1	1	633,244	665,393	-32,149	-4.832%
District 2	1	649,694	665,393	-15,699	-2.359%
District 3	1	667,574	665,393	2,181	0.328%
District 4	1	696,440	665,393	31,047	4.666%
District 5	1	695,971	665,393	30,578	4.595%
District 6	1	682,255	665,393	16,862	2.534%
District 7	1	632,579	665,393	-32,814	-4.932%
Grand Total:	7	4,657,757	4,657,751		

Ideal Population Per Member:	665393			Ideal - Actual:	-6
Number of Districts for Plan Type:	7			Remainder:	6
Range of District Populations:	632,579	to	696,440	Unassigned Population:	0
Absolute Mean Deviation:	9,123				
Absolute Range:	-32,814	to	31,047		
Absolute Overall Range:	63,861				
Relative Mean Deviation:	3.46%				
Relative Range:	-4.93%	to	4.67%		
Relative Overall Range:	9.60%				

RETRIEVED FROM DEMOCRACYDOCKET.COM

Total Population

Plan: Senate Bill 255 Enrolled (Fields)

	Total Population	Total White	Total Black	Total Asian	Total American Indian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP American Indian	VAP Other	VAP Hispanic Total
District 1	633,244	450,070	120,157	11,817	12,954	38,246	45,197	478,490	351,686	82,517	3,450	9,578	26,253	30,010
	100.000%	71.074%	18.975%	1.866%	2.046%	6.040%	7.137%	100.000%	73.499%	17.245%	1.707%	2.002%	5.487%	6.272%
District 2	649,694	236,828	374,328	9,346	6,276	22,916	27,572	496,736	195,133	272,915	7,254	4,676	16,758	19,853
	100.000%	36.452%	57.616%	1.439%	0.966%	3.527%	4.244%	100.000%	39.283%	54.942%	1.460%	0.941%	3.374%	3.997%
District 3	667,574	386,819	233,046	9,312	14,486	23,911	30,177	504,908	303,472	166,074	6,807	10,709	17,046	20,832
	100.000%	57.944%	34.909%	1.395%	2.170%	3.582%	4.520%	100.000%	60.104%	33.050%	1.348%	2.121%	3.376%	4.126%
District 4	696,440	460,832	180,907	12,768	14,804	27,129	32,240	535,998	365,217	139,717	9,318	11,311	19,435	22,487
	100.000%	66.170%	25.976%	1.833%	2.126%	3.895%	4.629%	100.000%	68.138%	24.388%	1.738%	2.110%	3.626%	4.195%
District 5	695,971	471,535	155,059	14,181	19,935	35,261	41,477	527,378	371,921	107,547	10,221	13,747	23,942	27,570
	100.000%	67.752%	22.280%	2.038%	2.864%	5.066%	5.960%	100.000%	70.521%	20.393%	1.938%	2.607%	4.540%	5.228%
District 6	682,255	456,187	117,620	28,750	11,466	68,232	83,135	533,956	370,203	85,048	21,383	8,640	48,682	58,348
	100.000%	66.865%	17.240%	4.214%	1.681%	10.011%	12.185%	100.000%	69.332%	15.928%	4.005%	1.618%	9.117%	10.927%
District 7	632,579	195,381	362,002	21,114	7,139	46,943	62,751	493,032	166,879	270,151	16,977	5,579	33,496	44,562
	100.000%	30.886%	57.226%	3.338%	1.129%	7.421%	9.920%	100.000%	33.844%	54.788%	3.443%	1.131%	6.793%	9.037%
Grand Total	4,657,757	2,657,652	1,543,119	107,288	87,060	262,638	322,549	3,670,748	2,124,511	1,115,769	80,416	64,240	185,612	223,662
	100.000%	57.059%	33.130%	2.303%	1.869%	5.639%	6.925%	100.000%	59.501%	31.249%	2.252%	1.799%	5.198%	6.264%

RETRIEVED FROM ELECTIONS.VOTERSOURCE.COM

Voter Registration

Plan: Senate Bill 255 Enrolled (Fields)

	Reg Total Dec 2023	Reg White Dec 2023	Reg Black Dec 2023	Reg Other Dec 2023	Reg Dem Total Dec 2023	Reg Rep Total Dec 2023	Reg Other Total Dec 2023
District 1	374,645	298,184	55,589	20,872	95,286	168,671	110,688
	78.297%	79.591%	14.838%	5.571%	25.434%	45.022%	29.545%
District 2	387,484	151,307	222,502	13,675	214,271	81,630	91,583
	78.006%	39.049%	57.422%	3.529%	55.298%	21.067%	23.635%
District 3	364,685	231,934	116,902	15,849	141,750	127,633	95,302
	72.228%	63.598%	32.056%	4.346%	38.869%	34.998%	26.133%
District 4	404,396	297,138	91,893	15,365	119,556	182,090	102,750
	75.447%	73.477%	22.724%	3.799%	29.564%	45.028%	25.408%
District 5	411,306	312,128	78,792	20,386	125,382	172,054	113,870
	77.991%	75.887%	19.157%	4.956%	30.484%	41.831%	27.685%
District 6	418,728	320,674	59,263	38,791	122,449	172,788	123,491
	78.420%	76.583%	14.153%	9.264%	29.243%	41.265%	29.492%
District 7	381,043	129,081	216,888	35,074	233,812	46,760	100,471
	77.278%	33.876%	56.920%	9.205%	61.361%	12.272%	26.367%
Grand Total	2,742,287	1,740,446	841,829	160,012	1,052,506	951,626	738,155

RETRIEVED FROM DEMOCRACYDOCKET.COM

Splits

Plan: Senate Bill 255 Enrolled (Fields)

	Total Population	Total White	Total Black	Total Asian	Total American Indian	Total Other	VAP Total	VAP White	VAP Black	VAP Asian	VAP American Indian	VAP Other	Reg Total Dec 2023	Reg White Dec 2023	Reg Black Dec 2023	Reg Other Dec 2023
District 1																
Livingston	142,282	116,855	12,658	1,697	3,111	7,961	105,141	88,432	8,136	1,099	2,311	5,163	82,405	73,655	5,642	3,108
*Orleans	4,008	798	1,234	1,275	46	655	2,904	693	727	1,046	30	408	1,811	448	521	842
St. Bernard	43,764	24,497	12,309	1,381	947	4,630	31,775	18,992	7,944	962	688	3,169	25,685	18,044	5,593	2,048
St. Tammany	264,570	196,641	38,643	5,774	5,660	17,852	202,228	154,621	26,761	4,075	4,161	12,610	174,307	141,262	21,129	11,916
Tangipahoa	133,157	81,336	41,879	1,474	2,454	6,014	101,491	65,205	29,217	1,100	1,827	4,142	63,286	46,172	14,812	2,302
Washington	45,463	29,943	13,434	216	736	1,134	34,951	23,743	9,732	154	561	761	27,151	18,603	7,892	656
District 1	633,244	450,070	120,157	11,817	12,954	38,246	478,490	351,686	82,517	8,456	9,578	26,253	374,645	298,184	55,589	20,872
	100.000%	71.074%	18.975%	1.866%	2.046%	6.040%	100.000%	73.499%	17.245%	1.767%	2.002%	5.487%	78.297%	79.591%	14.838%	5.571%
District 2																
Avoyelles	39,693	25,625	11,678	434	767	1,189	30,578	20,269	8,311	379	570	1,049	21,438	15,242	5,622	574
Concordia	18,687	10,275	7,725	122	233	332	14,217	8,108	5,613	100	167	229	11,419	6,816	4,418	185
*East Baton Rouge	248,989	57,650	170,478	6,179	1,859	12,823	189,976	49,226	125,434	4,784	1,449	9,020	139,787	34,983	97,634	7,170
East Carroll	7,459	2,054	5,272	29	43	61	5,901	1,773	4,043	19	27	39	4,564	1,218	3,305	41
East Feliciana	19,539	11,516	7,341	91	262	329	16,183	9,740	5,918	61	198	266	13,327	7,805	5,075	447
Iberville	30,241	14,833	13,730	202	274	1,202	24,086	12,462	10,232	149	221	1,022	19,906	9,999	9,484	423
*Lafayette	38,956	11,843	25,221	281	335	1,276	29,292	9,757	18,295	192	222	826	24,602	8,036	15,581	985
Madison	10,017	3,475	6,363	20	59	100	7,435	2,906	4,391	9	48	81	7,068	2,439	4,518	111
*Ouachita	53,221	9,163	41,473	696	382	1,507	36,814	7,986	28,715	612	269	1,232	30,464	4,842	24,615	1,007
Pointe Coupee	20,758	12,395	7,504	107	159	593	16,250	10,108	5,502	91	119	430	14,107	9,040	4,837	230
*Rapides	46,877	16,927	27,803	511	707	929	35,265	13,657	20,047	379	510	672	26,801	10,645	15,146	1,010
Richland	20,043	11,785	7,603	83	258	514	15,383	9,338	5,546	66	203	230	13,141	8,144	4,753	244
St. Helena	10,920	4,527	6,031	39	134	189	8,463	3,805	4,371	28	109	150	8,260	3,626	4,492	142
*St. Landry	37,638	17,826	18,884	153	227	548	28,349	14,060	13,669	108	148	364	24,870	12,156	12,161	553
Tensas	4,147	1,744	2,312	23	26	42	3,235	1,446	1,728	12	23	26	3,485	1,510	1,937	38
West Baton Rouge	27,199	14,307	11,170	287	326	1,109	20,526	11,146	8,149	209	219	803	16,753	9,620	6,764	369
West Feliciana	15,310	10,883	3,740	89	225	373	12,783	9,283	2,951	56	174	319	7,492	5,186	2,160	146
District 2	649,694	236,828	374,328	9,346	6,276	22,916	496,736	195,133	272,915	7,254	4,676	16,758	387,484	151,307	222,502	13,675
	100.000%	36.452%	57.616%	1.439%	0.966%	3.527%	100.000%	39.283%	54.942%	1.460%	0.941%	3.374%	78.006%	39.049%	57.422%	3.529%
District 3																
Allen	22,750	16,327	4,490	246	947	740	17,510	12,751	3,275	182	646	656	11,079	8,704	1,920	455
Beauregard	36,549	29,529	4,649	402	1,052	917	27,489	22,304	3,495	269	773	648	22,071	18,639	2,264	1,168
*Caddo	141,139	38,986	95,202	1,254	1,791	3,906	107,362	33,060	69,182	1,007	1,424	2,689	74,423	22,549	48,809	3,065
Calcasieu	216,785	139,772	59,386	4,702	3,536	9,389	163,166	108,789	41,898	3,359	2,604	6,516	111,819	80,364	26,493	4,962
Cameron	5,617	5,232	125	30	75	155	4,358	4,100	79	23	47	109	4,072	3,936	61	75
De Soto	26,812	15,284	9,973	117	740	698	20,440	11,909	7,425	86	557	463	17,887	11,005	6,317	565

Splits

Plan: Senate Bill 255 Enrolled (Fields)

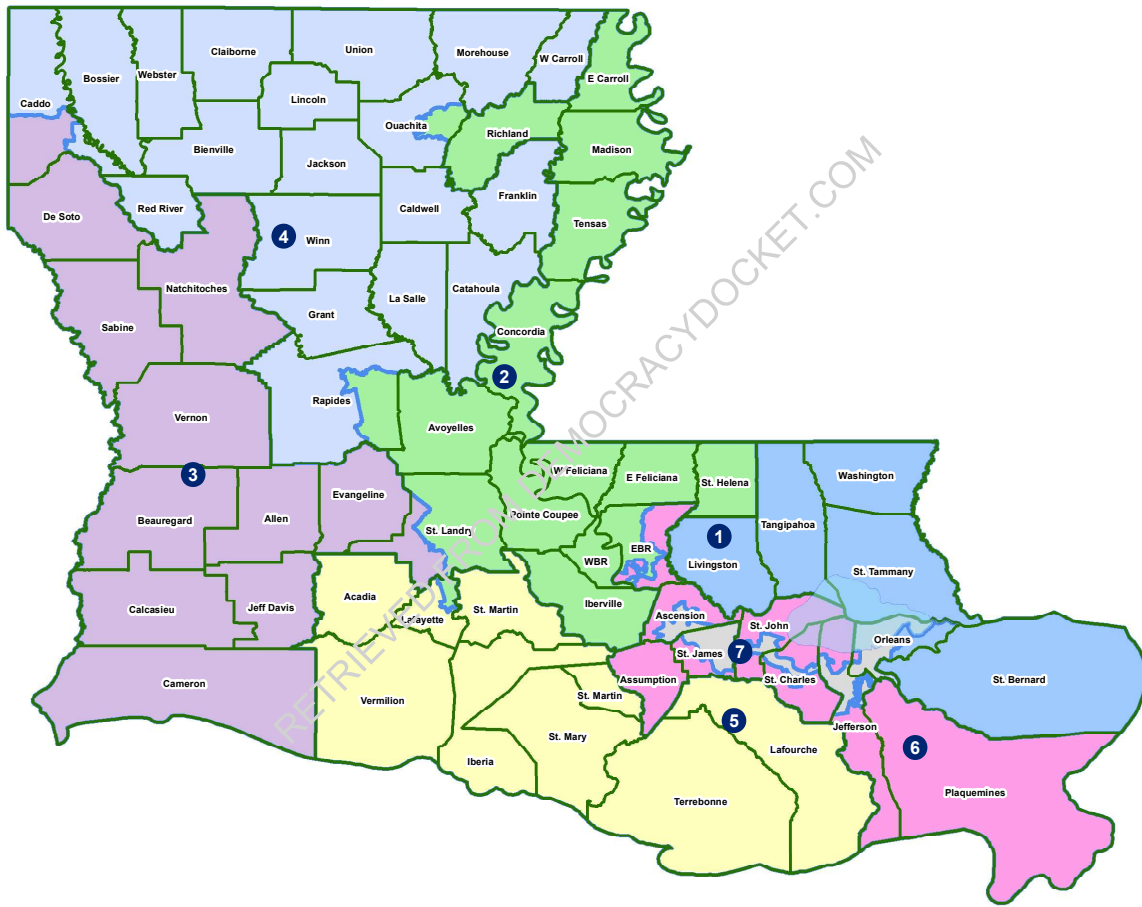
	Total Population	Total White	Total Black	Total Asian	Total American Indian	Total Other	VAP Total	VAP White	VAP Black	VAP Asian	VAP American Indian	VAP Other	Reg Total Dec 2023	Reg White Dec 2023	Reg Black Dec 2023	Reg Other Dec 2023
District 3																
Evangeline	32,350	21,354	9,235	241	280	1,240	24,408	16,460	6,483	187	217	1,061	20,388	14,274	5,744	370
Jefferson Davis	32,250	25,066	5,837	183	472	692	24,039	19,121	4,006	111	325	476	18,733	15,509	2,784	440
Natchitoches	37,515	19,361	15,725	255	861	1,313	29,349	16,010	11,415	198	683	1,043	20,675	11,761	8,016	898
Sabine	22,155	15,036	3,861	94	2,723	441	17,064	12,054	2,655	36	1,970	319	13,570	10,287	1,912	1,371
*St. Landry	44,902	25,785	16,952	346	409	1,410	33,462	20,149	11,828	245	303	937	27,559	16,777	9,974	808
Vernon	48,750	35,087	7,611	1,442	1,600	3,010	36,261	26,765	5,133	1,074	1,160	2,129	22,409	18,129	2,608	1,672
District 3	667,574	386,819	233,046	9,312	14,486	23,911	504,908	303,472	166,874	6,807	10,709	17,046	364,685	231,934	116,902	15,849
	100.000%	57.944%	34.909%	1.395%	2.170%	3.582%	100.000%	60.104%	33.050%	1.348%	2.121%	3.376%	72.228%	63.598%	32.056%	4.346%
District 4																
Bienville	12,981	6,950	5,600	57	207	167	10,073	5,486	4,284	30	162	111	8,336	4,509	3,728	99
Bossier	128,746	81,052	32,551	3,492	3,273	8,378	95,876	62,931	22,440	2,448	2,477	5,580	65,726	48,229	13,555	3,942
*Caddo	96,709	64,471	24,102	2,780	2,049	3,307	75,045	51,906	17,177	2,001	1,534	2,334	57,519	41,832	12,662	3,025
Caldwell	9,645	7,646	1,632	51	150	166	7,478	5,969	1,224	46	116	123	5,813	4,959	762	92
Catahoula	8,906	5,776	2,395	46	119	570	6,951	4,557	1,736	33	87	538	6,113	4,363	1,695	55
Claiborne	14,170	7,263	6,360	88	185	274	11,507	6,258	4,824	55	140	230	8,390	4,557	3,677	156
Franklin	19,774	12,492	6,802	70	205	205	15,028	9,901	4,779	44	153	151	12,350	8,524	3,718	108
Grant	22,169	17,709	3,335	133	644	348	17,327	13,964	2,717	97	507	242	12,226	10,764	1,120	342
Jackson	15,031	9,967	4,166	175	255	468	11,753	7,967	3,125	140	174	377	9,375	6,570	2,610	195
La Salle	14,791	11,348	1,422	283	372	1,366	11,563	8,636	1,065	264	271	1,327	8,380	7,633	583	164
Lincoln	48,396	26,034	19,364	892	662	1,444	38,655	21,306	15,119	744	526	960	24,408	15,139	8,357	912
Morehouse	25,629	12,281	12,484	160	370	334	20,062	10,095	9,300	117	279	271	15,440	7,806	7,377	257
*Ouachita	107,147	79,382	19,744	2,092	2,279	3,650	81,386	61,988	13,575	1,506	1,790	2,527	65,166	53,307	9,406	2,453
*Rapides	83,146	60,583	14,789	1,917	2,395	3,462	63,527	47,716	10,158	1,407	1,824	2,422	48,485	39,311	6,813	2,361
Red River	7,620	4,195	3,106	25	171	123	5,714	3,338	2,164	3	116	93	5,475	3,034	2,358	83
Union	21,107	14,460	5,224	62	338	1,023	16,632	11,807	3,861	39	254	671	14,802	10,847	3,497	458
Webster	36,967	22,735	12,679	208	587	658	28,753	18,144	9,464	154	558	433	21,259	14,068	6,744	447
West Carroll	9,751	7,894	1,425	27	180	225	7,532	6,223	1,010	20	136	143	6,871	5,770	1,013	88
Winn	13,755	8,594	3,727	210	263	961	10,906	6,932	2,695	170	207	902	8,262	5,916	2,218	128
District 4	696,440	460,832	180,907	12,768	14,804	27,129	535,998	365,217	130,717	9,318	11,311	19,435	404,396	297,138	91,893	15,365
	100.000%	66.170%	25.976%	1.833%	2.126%	3.895%	100.000%	68.138%	24.388%	1.738%	2.110%	3.626%	75.447%	73.477%	22.724%	3.799%
District 5																
Acadia	57,576	44,480	10,864	238	573	1,421	42,943	34,071	7,383	173	400	916	36,151	29,438	5,995	718
Iberia	69,929	39,206	24,556	2,123	794	3,250	52,791	31,295	17,069	1,562	581	2,284	42,188	26,848	13,441	1,899
*Lafayette	202,797	141,520	39,915	6,173	2,875	12,314	154,583	111,851	27,622	4,472	2,165	8,473	124,207	97,762	19,164	7,281
Lafourche	97,557	71,710	15,855	1,025	4,224	4,743	74,619	56,838	11,077	738	2,777	3,189	54,238	45,481	6,277	2,480

Splits

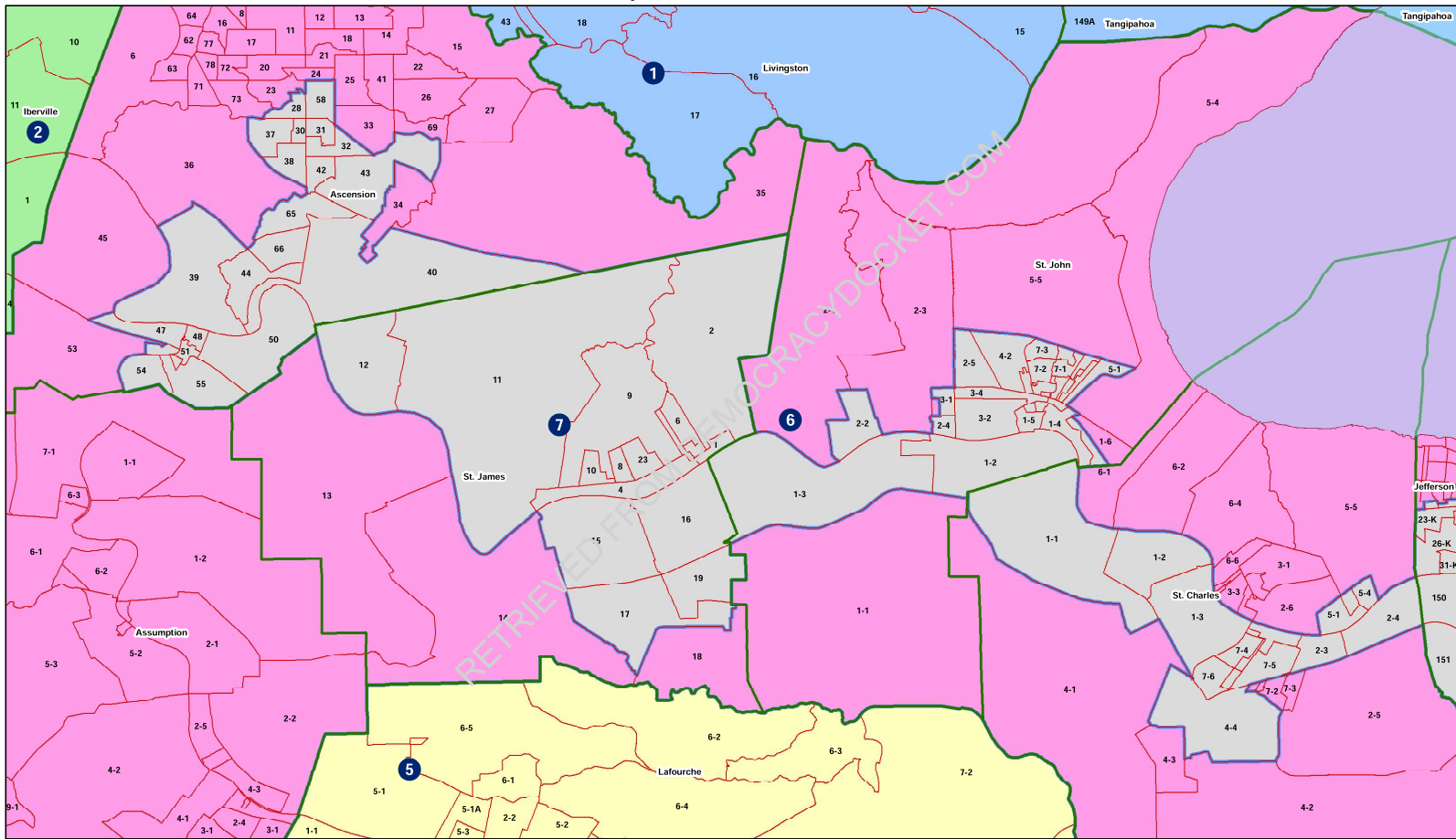
Plan: Senate Bill 255 Enrolled (Fields)

	Total Population	Total White	Total Black	Total Asian	Total American Indian	Total Other	VAP Total	VAP White	VAP Black	VAP Asian	VAP American Indian	VAP Other	Reg Total Dec 2023	Reg White Dec 2023	Reg Black Dec 2023	Reg Other Dec 2023
District 5																
St. Martin	51,767	33,259	15,921	597	539	1,451	39,404	26,278	11,293	407	413	1,013	33,997	23,306	9,880	811
St. Mary	49,406	26,949	15,991	835	1,670	3,961	37,521	21,594	11,520	593	1,173	2,641	29,204	17,999	9,570	1,635
Terrebonne	109,580	69,934	23,147	1,743	8,637	6,119	82,505	55,631	15,796	1,229	5,750	4,089	55,810	41,601	9,910	4,299
Vermilion	57,359	44,477	8,810	1,447	623	2,002	43,012	34,363	5,787	1,037	488	1,337	35,511	29,693	4,555	1,263
District 5	695,971	471,535	155,059	14,181	19,935	35,261	527,378	371,921	107,547	10,221	13,747	23,942	411,306	312,128	78,792	20,386
	100.000%	67.752%	22.280%	2.038%	2.864%	5.066%	100.000%	70.523%	20.393%	1.538%	2.607%	4.540%	77.991%	75.887%	19.157%	4.956%
District 6																
*Ascension	94,977	68,853	15,652	2,036	1,629	6,807	68,466	51,105	10,532	1,305	1,114	4,409	58,870	46,540	8,948	3,382
Assumption	21,039	13,722	6,220	96	258	743	16,616	11,145	1,707	57	197	510	13,323	8,977	4,131	215
*East Baton Rouge	207,792	138,419	42,920	10,246	2,868	13,339	165,636	114,592	31,356	7,815	2,298	9,575	129,050	97,762	21,868	9,420
*Jefferson	264,261	168,896	36,620	13,365	4,864	40,516	211,587	141,440	26,886	10,113	3,702	29,446	157,106	121,191	14,666	21,249
*Orleans	27,590	22,397	1,610	1,099	340	2,144	21,732	17,916	1,205	789	263	1,559	19,098	16,373	903	1,822
Plaquemines	23,515	14,287	5,428	1,317	697	1,786	17,334	10,255	3,857	925	500	1,196	13,143	8,996	2,934	1,213
*St. Charles	33,440	24,922	4,954	553	686	2,325	24,982	19,209	3,352	352	467	1,602	21,601	17,595	2,727	1,279
*St. James	3,366	1,081	2,213	5	16	51	2,599	868	1,676	2	15	38	2,525	734	1,752	39
*St. John the Baptist	6,275	3,610	2,003	33	108	521	5,004	3,072	1,476	25	84	347	4,012	2,506	1,334	172
District 6	682,255	456,187	117,620	28,750	11,466	68,232	512,996	370,203	85,048	21,383	8,640	48,682	418,728	320,674	59,263	38,791
	100.000%	66.865%	17.240%	4.214%	1.681%	10.001%	100.000%	69.332%	15.928%	4.005%	1.618%	9.117%	78.420%	76.583%	14.153%	9.264%
District 7																
*Ascension	31,523	12,288	16,564	264	375	2,032	23,491	10,031	11,606	209	276	1,369	19,776	9,002	9,880	894
*Jefferson	176,520	52,039	89,697	9,659	2,822	22,405	133,067	42,695	65,289	7,579	2,133	15,371	96,327	31,745	51,536	13,046
*Orleans	352,399	103,267	216,125	10,482	3,280	19,245	281,560	91,643	164,136	8,685	2,655	14,441	217,481	69,304	129,166	19,011
*St. Charles	19,109	8,628	8,974	284	239	984	14,559	6,945	6,538	177	200	699	11,981	5,816	5,543	622
*St. James	16,826	8,892	7,549	55	60	264	12,906	7,015	5,621	29	49	192	12,006	6,382	5,444	180
*St. John the Baptist	36,202	10,267	23,193	370	357	2,015	27,499	8,550	16,961	298	266	1,424	23,472	6,832	15,319	1,321
District 7	632,579	195,381	362,002	21,114	7,139	46,943	493,082	166,879	270,151	16,977	5,579	33,496	381,043	129,081	216,888	35,074
	100.000%	30.886%	57.226%	3.338%	1.129%	7.421%	100.000%	33.844%	54.788%	3.443%	1.131%	6.793%	77.278%	33.876%	56.920%	9.205%

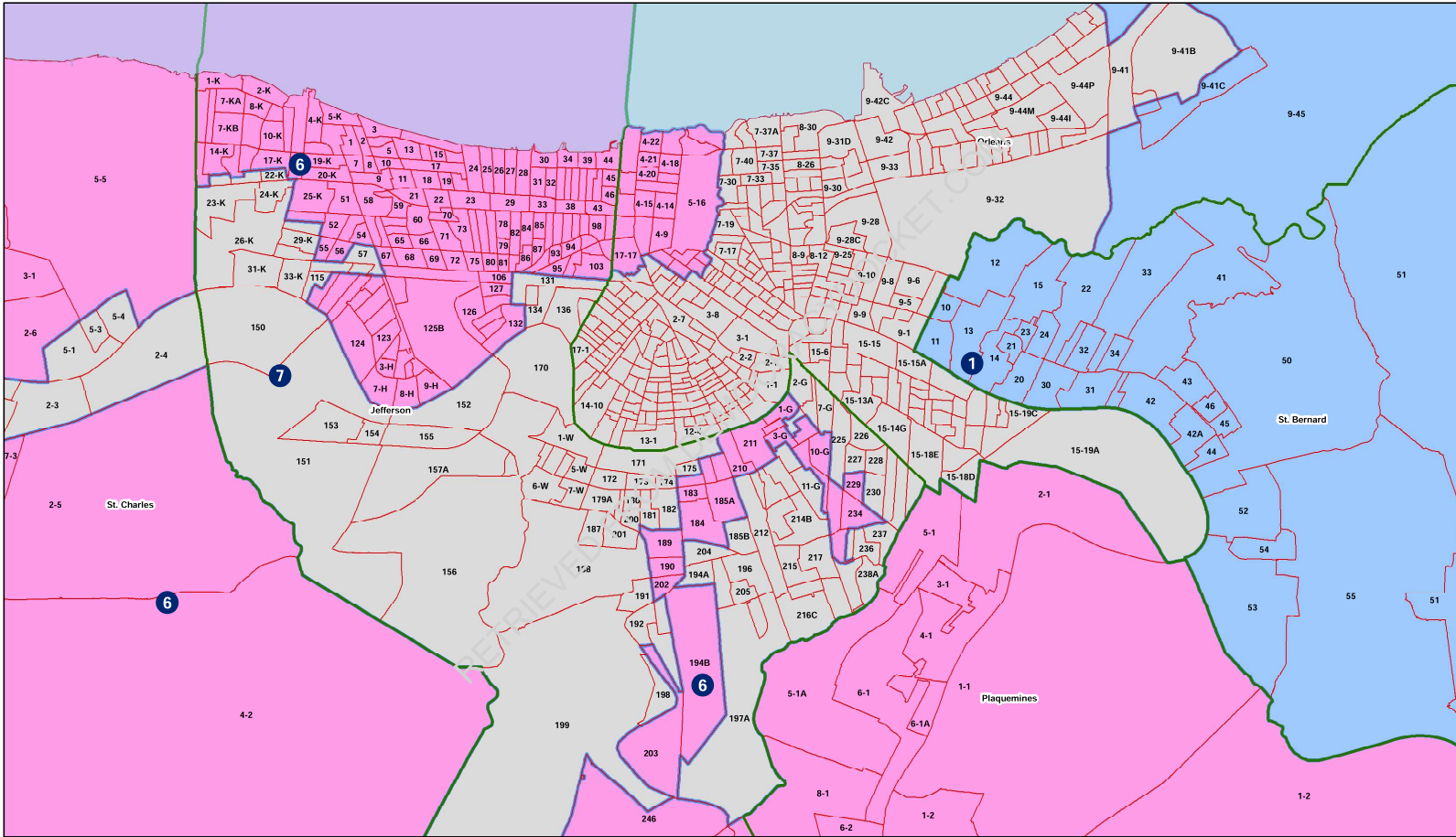
Supreme Court (7) - Statewide



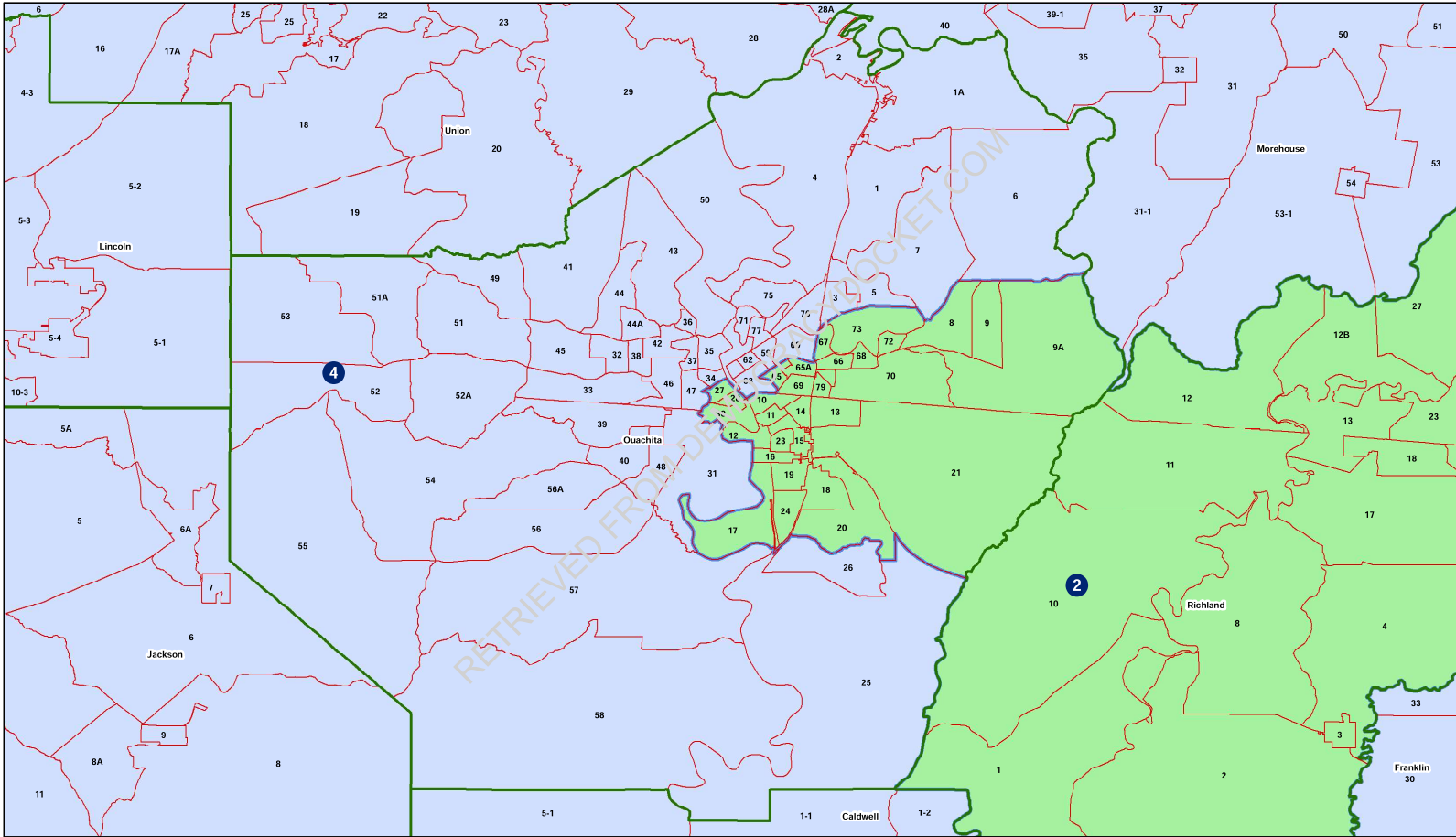
Supreme Court (7) - River



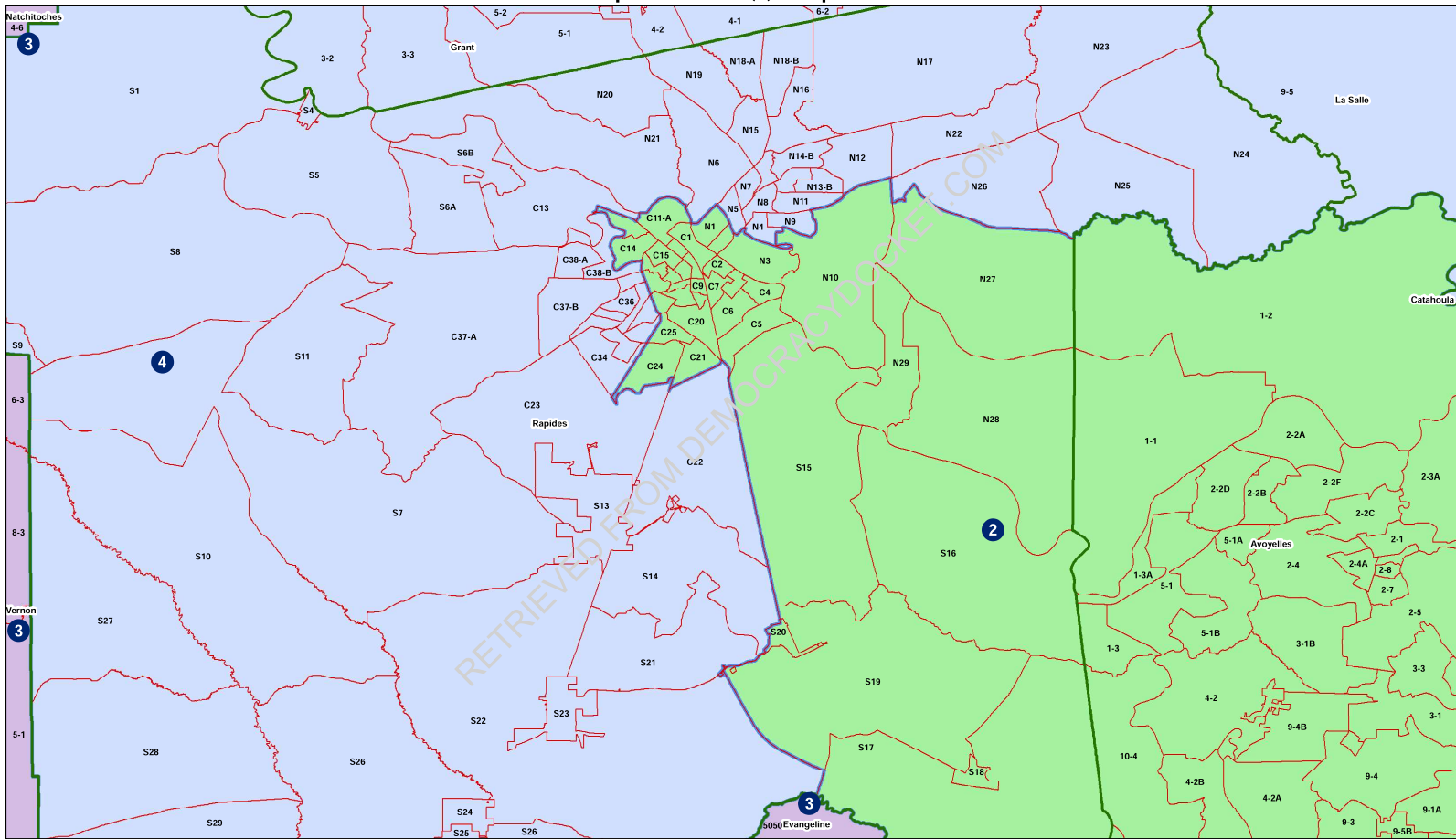
Supreme Court (7) - Jefferson-Orleans



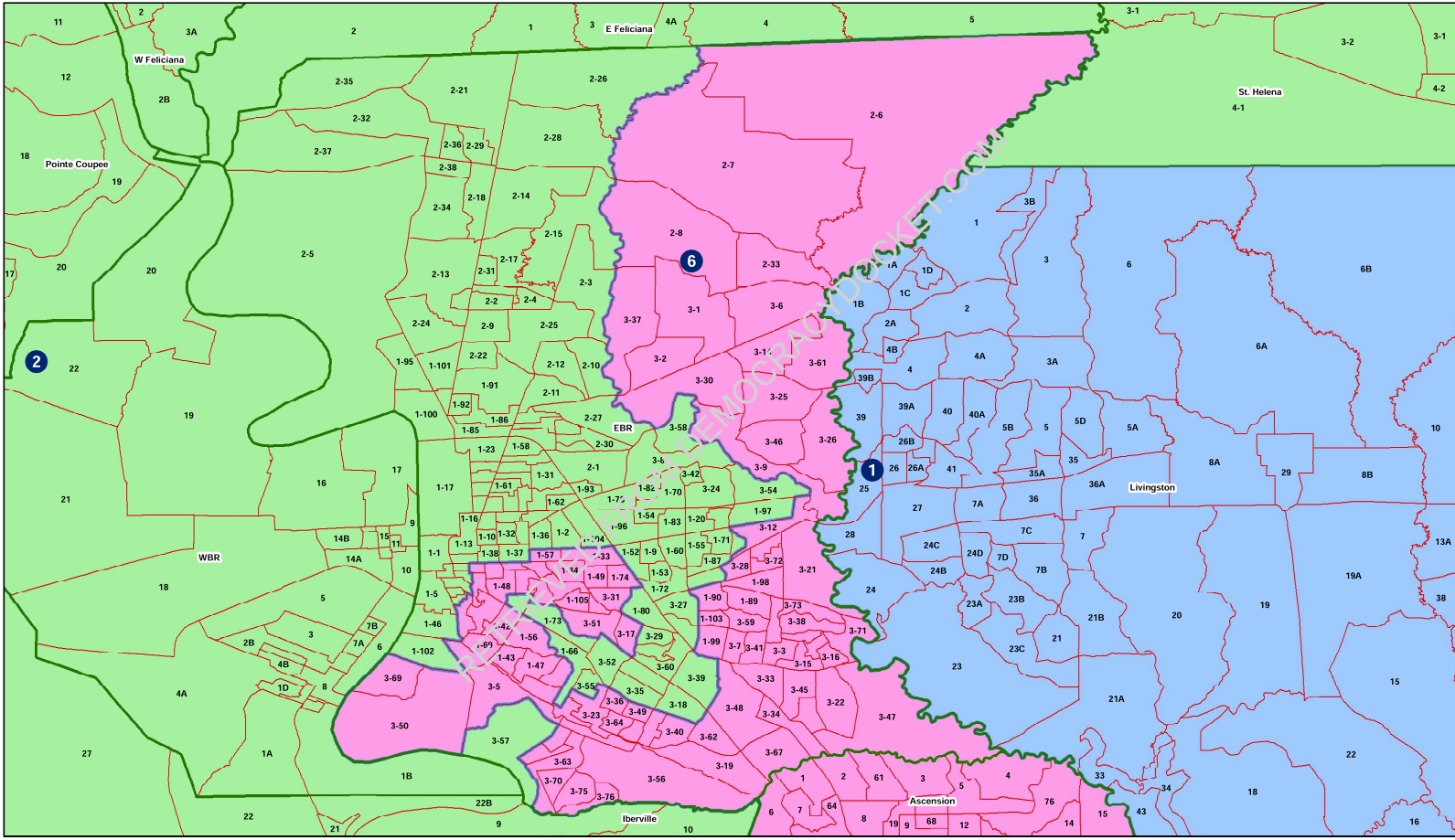
Supreme Court (7) - Ouachita



Supreme Court (7) - Rapides



Supreme Court (7) - EBR



Supreme Court (7) - Lafayette-St. Landry

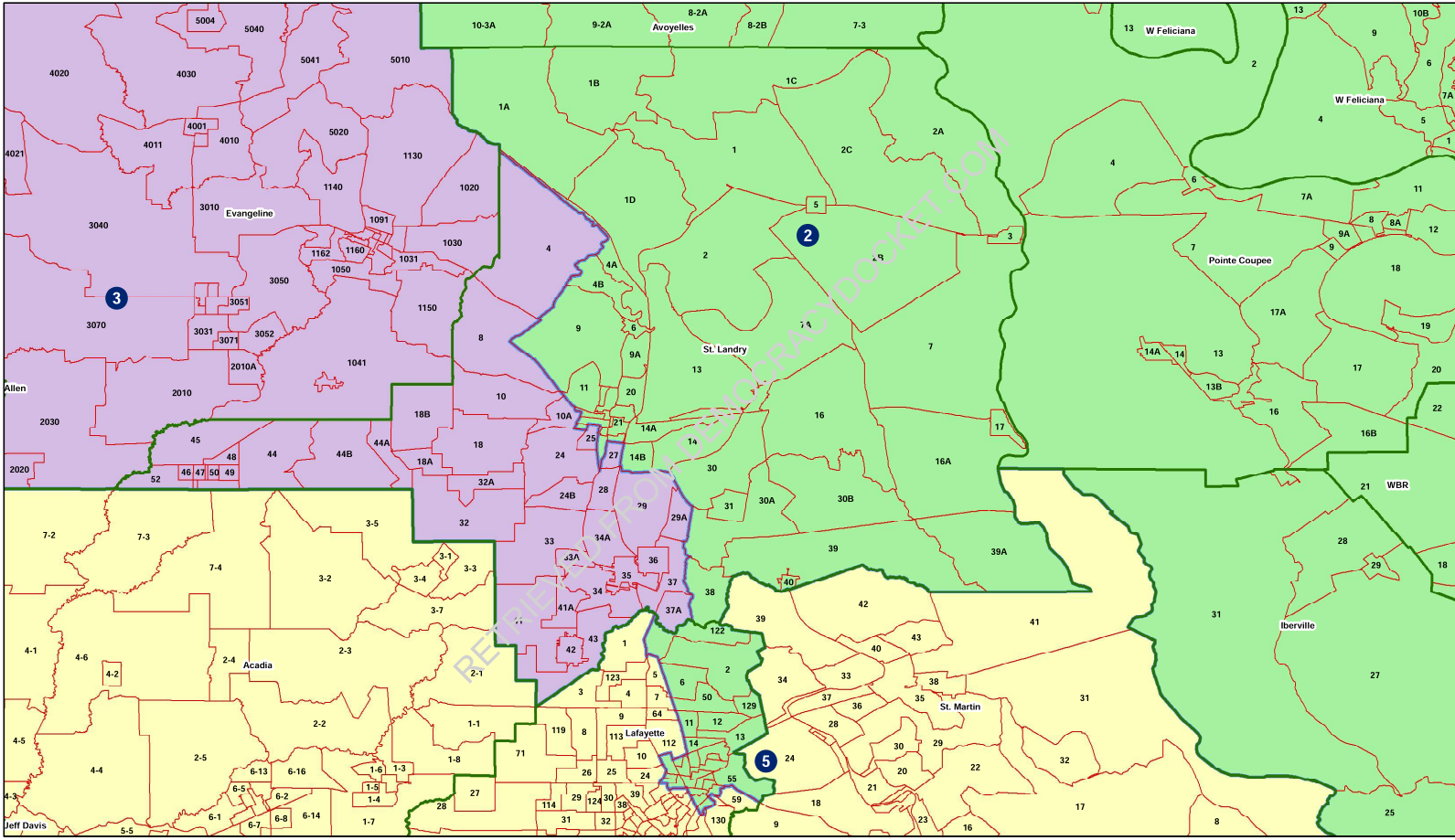


EXHIBIT C

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

RONALD CHISOM, *et al.*,

Plaintiffs,

BERNETTE J. JOHNSON,

Plaintiff-Intervenor,

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

STATE OF LOUISIANA, ex rel. Jeff
Landry, *et al.*,

Defendants.

Civil Action No. 86-cv-4075 (SM)(SS)

**RULE 60(B)(5) MOTION TO DISSOLVE CONSENT DECREE AND
REQUEST FOR INDICATIVE RULING UNDER RULE 62.1**

Pursuant to Federal Rules of Civil Procedure 60(b)(5) and 62.1, Plaintiffs Ronald Chisom, Marie Bookman, and the Urban League of Louisiana (“Chisom Plaintiffs”), and Plaintiff-Intervenor Justice Johnson (collectively “Movants”) respectfully move this Court to (i) dissolve the Consent Decree under Fed. R. Civ. P. 60(b)(5), and (ii) issue an indicative ruling stating that it would grant Movants’ Rule 60(b)(5) Motion if the Fifth Circuit Court of Appeals were to remand this matter now pending before it. Fed. R. Civ. P. 60(b)(5), 62.1. The United States supports the present motion to dissolve the Consent Decree given the facts stated herein. The Defendant Attorney General takes no position on this motion.

On December 2, 2021, Defendant Attorney General filed a Motion to Dissolve Consent Decree entered by U.S. District Judge for the Eastern District of Louisiana Charles Schwartz on August 21, 1992—and which, in 1997—the parties jointly moved to modify to incorporate implementing legislation (“Consent Decree”). ECF. No. 257. This Court denied the Attorney General’s motion on May 24, 2022, and the case is now pending on appeal before the Fifth Circuit Court of Appeals (“Fifth Circuit”). *Chisom v. Louisiana ex rel. Landry*, No. 22-30320, 2024 WL 323496 (Jan. 29, 2024). Oral argument is scheduled for May 16, 2024.

On May 1, 2024, Louisiana enacted Act 7 into law, which redraws the Supreme Court districts and preserves an Orleans Parish-based district that is majority-Black in voting-age population and that Movants agree provides Black voters in Orleans Parish an equal opportunity to elect candidates of choice to the Louisiana Supreme Court. S.B. 255, 2024 Leg., Reg. Sess. (La. 2024) (“Act 7”). In view of this significant change in the factual circumstances, Movants request dissolution of the Consent Decree under Rule 60(b)(5). Movants also respectfully request that this Court issue an indicative ruling stating that it would grant Movants’ Rule 60(b) Motion to Dissolve the Consent Decree if the Fifth Circuit remanded the case for this purpose. *See Fed. R. Civ. P. 60(b)(5), 62.1*. In support of this Motion, Movants have contemporaneously filed a Memorandum of Law and copies of Act 7 attached thereto.

Date: May 10, 2024

Respectfully submitted,

William P. Quigley, #07769
LOYOLA UNIVERSITY
SCHOOL OF LAW
7214 St. Charles Avenue
New Orleans, Louisiana 70118
Tel. (504) 710-3074
quigley77@gmail.com

s/ Leah C. Aden

Leah C. Aden*
Alaizah Koorji*
NAACP LEGAL DEFENSE & EDUCATIONAL
FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Tel. (212) 965-7715
laden@naacpldf.org

Ronald L. Wilson, #13575
701 Poydras Street, Suite 4100
New Orleans, Louisiana 70139
Tel. (504) 525-4361
cabral2@aol.com

Andrew D. Linz*
COZEN O'CONNOR
Liberty Place, 1650 Market Street
Suite 2800
Philadelphia, Pennsylvania 19103

Michael de Leeuw*
Amanda Giglio*
COZEN O'CONNOR
3 WTC, 175 Greenwich Street
55th Floor
New York, New York 10007
Tel. (212) 908-1131
mdeleeuw@cozen.com

*Admitted *pro hac vice*

Counsel for Plaintiffs Ronald Chisom, Marie Bookman, and Urban League of Louisiana

Tracie L. Washington, #25925
LOUISIANA JUSTICE INSTITUTE
3157 Gentilly Blvd., Suite 132
New Orleans LA, 70122
tracie.washington.esq@gmail.com

James M. Williams, #26141
CHEHARDY SHERMAN WILLIAMS
RECILE & HAYES, LLP
1 Galleria Blvd, Suite 1100
Metairie, LA 70001
(504) 962-4287
james@thetrialteam.com

Nora Ahmed*
AMERICAN CIVIL LIBERTIES UNION OF
LOUISIANA
1340 Poydras Street, Suite 2160
New Orleans, LA 70112
(504) 522-0628
nahmed@laaclu.org

*Admitted *pro hac vice*

Counsel for Plaintiff-Intervenor Justice Bernette J. Johnson

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Defendants.

Civil Action No. 86-cv-4075 (SM)(SS)

**MEMORANDUM IN SUPPORT OF RULE 60(B)(5) MOTION TO DISSOLVE
CONSENT DECREE AND REQUEST FOR INDICATIVE RULING UNDER
FED. R. CIV. P. 62.1**

Plaintiffs Ronald Chisom, Marie Bookman, and the Urban League of Louisiana and Plaintiff-Intervenor Justice Johnson (collectively “Movants”) submit the following memorandum of law in support of their Rule 60(b)(5) Motion to Dissolve the Consent Decree and Request for an Indicative Ruling under Federal Rule of Civil Procedure 62.1. Fed. R. Civ. P. 60(b)(5), 62.1. The United States supports the present motion to dissolve the Consent Decree given the facts stated herein. Defendant Attorney General takes no position on this motion.

PROCEDURAL BACKGROUND AND NEW LEGISLATION

This litigation began in 1986, when several plaintiffs sued the State of Louisiana under Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, challenging the method of electing justices to the Louisiana Supreme Court. *See generally* Compl., ECF No. 1. The United States intervened as a plaintiff. Order on Mot. to Intervene, ECF No. 58. The parties resolved the litigation in 1992 with a Consent Decree that, among other things, required Louisiana to reapportion the Supreme Court districts to include one district that encompasses Orleans Parish and is majority Black in voting-age population, thereby establishing an electoral method that provides Black voters in Orleans Parish an equal opportunity to elect a candidate of choice. *See generally* Consent Decree, ECF No. 257-4. The Legislature enacted such a reapportionment plan in 1997, and it was incorporated into the Consent Decree upon joint motion of the parties. Jt. Mot. to Am. Consent Judgment ¶ 4, ECF No. 135.

On December 2, 2021, Louisiana's Attorney General moved under Rule 60(b)(5) to Dissolve the Consent Decree. ECF No. 257. This Court denied the Attorney General's Motion, holding that the State had not met its Rule 60(b)(5) burden to show that if the Consent Decree were dissolved, it would maintain a district that provided Black voters in Orleans Parish an equal opportunity to elect candidates of choice to the Supreme Court, or, alternatively, that continued enforcement of the Consent Decree was inequitable. *See generally* Order and Reasons, ECF No. 324. The Attorney General appealed. ECF No. 325. A majority of a three-judge panel affirmed the District Court's denial, *Chisom v. Louisiana ex rel. Landry*, 85 F.4th 288 (5th Cir. 2023), but that decision was later vacated. *Chisom v. Louisiana ex rel. Landry*, No. 22-30320, 2024 WL 323496 (Jan. 29, 2024). The Fifth Circuit Court of Appeals ("Fifth Circuit") granted re-hearing en banc, and argument is scheduled for May 16, 2024. 5th Cir. ECF No. 198.

Under the Consent Decree, the legislature retains the authority to redraw the Supreme Court Districts following a decennial census, including redrawing the *Chisom* district provided such changes are non-dilutive for Black voters in Orleans Parish. *See, e.g.*, ECF No. 257 at 97-113 (Consent Decree, Joint Motion to Amend Consent Decree); ECF No. 135 (Amendment to the Consent Decree reflecting incorporation of Act No. 776, 1997 La. Acts 1265 § 101.1(e)). On May 1, 2024, Louisiana enacted Act 7 into law, which redraws the Supreme Court districts for the first time since 1997. *See* S.B. 255, 2024 Leg., Reg. Sess. (La. 2024) (“Act 7”), attached hereto as **Exhibit A**. Act 7 preserves an Orleans Parish-based district that is majority-Black in voting-age population, and that Movants agree provides Black voters in Orleans Parish an equal opportunity to elect candidates of choice to the Louisiana Supreme Court. *See id.*; Enrolled Senate Bill 255, attached hereto as **Exhibit B**. Further, Act 7 addresses the existing malapportionment in Supreme Court election districts, an issue raised in support of the Attorney General’s Motion to Dissolve the Consent Decree and in briefing before this Court. *See* Attorney General’s Dec. 2021 Motion to Dissolve Consent Decree, ECF No. 257 at 8-9; *See* 4/4/24 Louisiana House and Governmental Affairs Committee Session, https://house.louisiana.gov/H_Video/VideoArchivePlayer?v=house/2024/apr/0404_24_HG. Act 7 represents a significant change in circumstance, warranting dissolution of the Consent Decree under Rule 60(b)(5).

ARGUMENT

In light of the recent passage of Act 7, Movants respectfully request that this Court issue an indicative ruling stating that it would grant Movants’ Rule 60(b)(5) Motion to Dissolve the Consent Decree. *See* Fed. R. Civ. P. 60(b), 62.1. Although this Court may not grant relief pursuant to Rule 60(b) while an appeal is pending, it may nevertheless issue an indicative ruling stating

“either that it would grant the motion if the court of appeals remands for that purpose or that the motion raises a substantial issue.” Fed. R. Civ. P. 62.1(a)(3). This Court may then decide the motion “if the court of appeals remands for that purpose.” Fed. R. Civ. P. 62.1(c); *see Lopez v. Dominguez v. Gulf Coast Marine & Assoc., Inc.* 607 F.3d 1066, 1074 (5th Cir. 2010) (although a district court may not grant a Rule 60(b) motion while an appeal is pending, the district court retains jurisdiction to consider them, “and if it indicates that it will grant the motion, the appellant [may] then make a motion in the Court of Appeals for a remand of the case in order that the district court may grant such motion.”).

Dissolution of the Consent Decree pursuant to Rule 60(b)(5) is now warranted given the enactment of Act 7. Among other things, Act 7 maintains a majority-Black district centered around Orleans Parish. Ex. B, at 9. Based on voting patterns in past elections, Movants believe that this district will provide Black voters in Orleans Parish an equal opportunity to participate in the political process and elect candidates of choice to the Louisiana Supreme Court. *See id.* Thus, Movants and the United States are satisfied that Act 7 both (i) adequately protects the rights of Black voters in an Orleans Parish-based district, and (ii) demonstrates prospective compliance with Section 2 of the Voting Rights Act in that area and with the State’s obligations under the Consent Decree. In short, the State has now “shown there will continue to be a Black opportunity district in Orleans Parish in the future.” Order Denying Mot. to Dissolve, ECF No. 324 at 15. Dissolution of the Consent Decree in lieu of rehearing en banc is thus warranted, balances the interests of the parties, and supports judicial economy.

CONCLUSION

For the foregoing reasons, Movants request that this Court issue an indicative ruling pursuant to Rule 62.1 stating that it would grant Movants’ Rule 60(b)(5) Motion to Dissolve the Consent Decree in light of Act 7.

Date: May 10, 2024

Respectfully submitted,

s/ Leah C. Aden

William P. Quigley, #07769
LOYOLA UNIVERSITY
SCHOOL OF LAW
7214 St. Charles Avenue
New Orleans, Louisiana 70118
Tel. (504) 710-3074
quigley77@gmail.com

Leah C. Aden*
Alaizah Koorji*
NAACP LEGAL DEFENSE & EDUCATIONAL
FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Tel. (212) 965-7715
laden@naacpldf.org

Ronald L. Wilson, #13575
701 Poydras Street, Suite 4100
New Orleans, Louisiana 70139
Tel. (504) 525-4361
cabral2@aol.com

Michael de Leeuw*
Amanda Giglio*
COZEN O’CONNOR
3 WTC, 175 Greenwich Street
55th Floor
New York, New York 10007
Tel. (212) 908-1131
mdeleeuw@cozen.com

Andrew D. Linz*
COZEN O’CONNOR
Liberty Place, 1650 Market Street
Suite 2800
Philadelphia, Pennsylvania 19103

*Admitted *pro hac vice*

Counsel for Plaintiffs Ronald Chisom, Marie Bookman, and Urban League of Louisiana

Tracie L. Washington, #25925
LOUISIANA JUSTICE INSTITUTE
3157 Gentilly Blvd., Suite 132
New Orleans LA, 70122
tracie.washington.esq@gmail.com

Nora Ahmed*
AMERICAN CIVIL LIBERTIES UNION OF
LOUISIANA
1340 Poydras Street, Suite 2160
New Orleans, LA 70112
(504) 522-0628
nahmed@laaclu.org

James M. Williams, #26141
CHEHARDY SHERMAN WILLIAMS
RECILE & HAYES, LLP

1 Galleria Blvd, Suite 1100
Metairie, LA 70001
(504) 962-4287
james@thetrialteam.com

*Admitted *pro hac vice*

Counsel for Plaintiff-Intervenor Justice Bernette J. Johnson

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Defendants.

Civil Action No. 86-cv-4075 (SM)(SS)

[PROPOSED] ORDER

Considering Movants' Motion Pursuant to Fed. R. Civ. P. 60(b)(5) and 62.1:

IT IS ORDERED that the Movants' Rule 60(b)(5) Motion to Dissolve the Consent and Request for an Indicative Ruling is **GRANTED**.

If the U.S. Court of Appeals for the Fifth Circuit remands *Chisom v. State of Louisiana*, No. 22-30320, this Court would grant Movants' Rule 60(b) Motion to Dissolve the Consent Decree entered on August 21, 1992 and amended on January 3, 2000.

UNITED STATES DISTRICT JUDGE