

IN THE
Supreme Court of the United States

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

**BRIEF OF REPRESENTATIVES TROY CARTER,
TERRI SEWELL, BENNIE THOMPSON,
AND VALERIE FOUSHEE AS *AMICI CURIAE*
IN SUPPORT OF APPELLANTS**

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INTEREST OF *AMICI CURIAE*¹

Representative Troy Carter represents Louisiana's 2nd Congressional district, which currently spans most of the Orleans and Jefferson Parishes and snakes up the Mississippi River to include many of Louisiana's River Parishes. Representative Carter is deeply connected to the region and its people. He grew up in New Orleans, served on its city council, and then represented portions of the city as a member of the Louisiana Senate. Representative Carter began serving the 2nd Congressional district in 2021, and has served the 2nd District as a member of the House Homeland Security Committee as well as the House Transportation and Infrastructure Committee. In the course of advocating for his constituents, Representative Carter has partnered with members of both parties, including Majority Leader Steve Scalise on a bipartisan proposal that would increase Louisianians' share of energy revenues. Representative Carter graduated from Oliver Perry Walker High School in Algiers, New Orleans before earning degrees in business administration and political science from Xavier University of Louisiana as well as a Master of Business Administration from the University of Holy Cross.

Representative Terri Sewell represents Alabama's 7th Congressional District, which encompasses portions of the rural Black Belt as well as Birmingham, which is one of the state's largest cities. First elected to the House in 2010,

1. Pursuant to Supreme Court Rule 37.6, counsel for *amici curiae* states that no counsel for a party authored this brief in whole or in part. No counsel or party made a monetary contribution intended to fund the preparation or submission of this brief, and no person other than *amici* or their counsel made such a contribution.

she is currently serving her seventh consecutive term in office. Representative Sewell's longtime commitment to election integrity and voter protection is reflected by her current appointments, which include ranking member of the House Subcommittee on Elections, co-chair of the Congressional Voting Rights Caucus, and chair of the Congressional Black Caucus's Voting Rights Task Force. Her other assignments in the 118th Congress include the House Ways & Means Committee and the House Armed Services Committee. Representative Sewell grew up in the 7th District and graduated as valedictorian from Selma High School before later attending Princeton University, Oxford University, and Harvard Law School.

Representative Bennie Thompson represents Mississippi's 2nd Congressional district, which is a majority-minority district that spans the bulk of western Mississippi along the northern portion of the state's border with Louisiana. He is the only minority and Democratic member in Mississippi's congressional delegation. Representative Thompson assumed office in 1993, serving his district continuously for 31 years. During his tenure, he has served both as a ranking member and the chair of the House Homeland Security Committee. In the aftermath of Hurricane Katrina, which disproportionately devastated minority communities in both Louisiana and Mississippi, he worked diligently to support funding for the Federal Emergency Management Agency. Representative Thompson was raised and educated in Mississippi, with degrees from Tugaloo College and Jackson State University.

Since 2023, Representative Valerie Foushee has represented North Carolina's 4th Congressional district,

which is a mixed-rural and urban region in the central-northern portion of the state, encompassing the cities of Chapel Hill and Durham, and commonly referred to as North Carolina's "Research Triangle" region. The population of North Carolina's 4th Congressional district is predominately white. From 2013 to 2023, Representative Foushee was a member of the North Carolina State Senate. As the Research Triangle's representative, Representative Foushee has an eye towards the future, and has been a long-term champion of equality in education. Earlier this year, she co-hosted an Alternative Intelligence roundtable at Duke University, where she discussed the need to combine innovation with commitment to social equity and diversity in our fast-changing society. Representative Foushee earned a Bachelor's degree at the University of North Carolina, Chapel Hill.

Amici are honored to represent an array of Americans in the Southern region of our nation, all of whom could be impacted by the Court's decision in this case. Representative Carter represents Louisiana's 2nd Congressional district, and what would have been one of two majority-minority districts in that state but for the court's decision below. Representative Carter believes that a second majority-minority district is important to ensure that Louisiana's Black citizens have the congressional representation of their choice. These *amici* are all members of the Congressional Black Caucus ("CBC"), which is and has been committed to using the full constitutional power, statutory authority, and financial resources of the federal government to ensure that African Americans and other marginalized communities in the United States have the opportunity to achieve the American Dream. An important part of this

effort includes combatting voter suppression. Through their work in Congress, as members of the CBC, and in discussions with their constituents, *amici* understand the discriminatory effects of voting systems, and the crucial roles that the Voting Rights Act (“VRA”) and redistricting plans drawn in accordance with it play in remedying such discrimination.

SUMMARY OF ARGUMENT

The redistricting plan at issue in this litigation is incredibly significant to Louisianians as it impacts their representation in the United States Congress. This case also has national importance as Appellees’ argument effectively seeks to render efforts to comply with Section 2 of the VRA unconstitutional, which could thereby impact the redistricting processes of legislatures across our nation. Granting the requests that Appellees seek would dilute the representation of minorities and Black Americans in Congress and in state legislatures nationwide.

Appellees’ argument also fails to account for the practices and political participation that majority-minority districts foster. *Amici* urge this Court to consider the manner in which majority-minority districts contribute to interracial integration and communication and bipartisanship. As a group of elected officials from both majority-minority and non-majority-minority districts, *amici* offer their perspective regarding the advantages of majority-minority districts, including significantly advancing political participation and opportunities for Black Americans.

ARGUMENT**I. THIS COURT SHOULD REVERSE THE PANEL'S JUDGMENT BECAUSE APPELLEES FAILED TO DISENTANGLE RACE FROM POLITICS.**

Amici agree with Appellants' merits argument that Appellees and Western District of Louisiana panel (the "Panel") failed to disentangle race and politics in considering the constitutionality of Senate Bill 8 ("SB8"). See Br. for Appellants 4–6 (hereinafter, "App. Br."). As this Court has held, "a party challenging a map's constitutionality must disentangle race and politics if it wishes to prove that the legislature was motivated by race as opposed to partisanship." *Alexander v. S.C. State Conf. of the NAACP*, 602 U.S. 1, 6 (2024).

Allowing legislatures to draw their own districts is vitally important. Redistricting informs political power by influencing how electoral districts are drawn. For example, redistricting can determine the matters that legislatures choose to address. Legislators are keenly aware of their constituents' needs and priorities. Allowing them to draw their own districts helps to ensure that local interests are adequately represented.

Here, the record clearly reflects that in enacting SB8, Louisiana's Legislature (the "Legislature") sought to achieve its political goals—maintaining its incumbent preferences—while also adopting a map that addressed the Fifth Circuit and the Middle District of Louisiana's findings in *Robinson v. Ardoin* concerning the VRA. The Panel was presented with a plethora of evidence that the Legislature enacted SB8 with its political goals top of

mind. For example, the Panel received the transcripts from the Legislature’s January 16, 2024 Special Session, in which the Legislature considered SB8. During that session, Senator Glen Womack explained that “the congressional voting boundaries represented in [SB8] best achieve the [Legislature’s] goals of protecting Congresswoman Letlow’s seat, maintaining strong districts for Speaker Johnson and Majority Leader Scalise, ensuring four Republican districts, and adhering to the command of the federal court in the Middle District of Louisiana.” App. 394a–95a. And when asked whether race was the predominant factor in the creation of District 6, Senator Womack testified that it was not. App. 395a. Representative Beau Beaulieu’s testimony before the Panel is consistent with Senator Womack’s statements. Representative Beaulieu explained to the Panel that SB8 ensured that: (1) “Congresswoman Letlow remains both unimpaired with any other incumbents, and in a congressional district that should continue to elect a Republican Congress for the remainder of this decade[;]” and (2) four of Louisiana’s six congressional districts would be “safe Republican seats,” while also addressing the Middle District of Louisiana’s VRA concerns. App. 538a–39a.

Moreover, had race predominated the Legislature’s considerations, then the Legislature could have allowed the *Robinson* court to draw a new map itself with two majority-minority districts.² But instead, the Legislature

2. See App. 60a (“Republicans were afraid that if they didn’t [draw a map], that the court would draw one that wouldn’t be as politically advantageous for them.”); App. 362a–63a (Attorney General Elizabeth Murrill testifying that if the Legislature did not draw a new map, then there would be a trial on the merits in

intentionally decided to draw the map because a map drawn by the *Robinson* court would not likely have accounted for the political goals that the Legislature wanted to achieve. This is evidenced by Governor Jeff Landry’s statement that SB8 would “satisfy the [Middle District of Louisiana] and ensure that the congressional districts of our State are made . . . in th[e] Legislature and not by some heavy handed federal judge. . . . [The Legislature does] not need a federal judge to do for [the Legislature] what the people of Louisiana have elected [the Legislature] to do for them.” App. 560a; *see also* App. 60a, 362a–63a. Despite this and the abundance of other evidence that politics was the driving force behind the SB8 map, the Panel improperly found that race predominated the enactment of SB8.³ Because Appellees and the Panel failed to disentangle race from politics, this Court should reverse the Panel’s judgment.

Appellees’ failure to disentangle politics and race continues even in their brief filed in this Court. Therein, Appellees seek to render unconstitutional the Legislature’s attempt to comply with what federal courts determined the VRA requires. *See* App. Br. 18. Specifically, Appellees argue the “State’s claim that SB8 was motivated by VRA litigation in the Middle District of Louisiana that would purportedly lead to a two-Black-majority seat mandate . . . provides conclusive direct evidence” that race predominated. *Id.* But under Appellees’ logic, any legislature’s redistricting plan that seeks to comply with

the Middle District of Louisiana that would be “very quick” to consider the HB1 map, and the Legislature would run the risk of the court saying it still did not like the HB1 map and draw a new map itself).

3. App. 171a, 175a.

the VRA could be deemed unconstitutional. In fact, if Appellees' reasoning is adopted by this Court, Louisiana might not have a single majority-Black Congressional district, which would have a devastating impact on the political power of Black citizens in Louisiana. This is particularly problematic given Louisiana's history of racial bloc voting,⁴ a large Black population,⁵ and long history of discrimination against Black citizens. As at least one court has opined, throughout much of Louisiana's history, "dominant white citizens[] [have shown a] firm determination to maintain white supremacy in state and local government by denying [Black citizens] the right to vote." *United States v. Louisiana*, 225 F. Supp. 353, 363 (E.D. La. 1963), *aff'd sub nom. Louisiana v. United States*, 380 U.S. 145 (1965).

For these reasons, this Court should reject Appellees' argument, reverse the Panel's judgment, and find that race did not predominate Legislature considerations in enacting SB8.

II. MAJORITY-MINORITY DISTRICTS PLAY AN IMPORTANT ROLE IN ADVANCING INTERRACIAL COLLABORATION AND INTEGRATION AS WELL AS BIPARTISANSHIP.

In their brief, Appellees attack the creation of a second majority-minority Congressional district in the state of

4. See *Robinson v. Ardoin*, 86 F.4th 574, 595–97 (5th Cir. 2023) (finding district court did not err with respect to its finding that Louisiana's white majority sufficiently voted as a bloc to beat out candidates preferred by the state's minority population).

5. *QuickFacts Louisiana*, UNITED STATES CENSUS BUREAU (July 1, 2023) <https://www.census.gov/quickfacts/LA>.

Louisiana, while seemingly resting on the assumption that majority-minority districts are something to be bemoaned. Representatives Carter, Sewell, Thompson, and Foushee write to respectfully but strongly urge the Court to consider the manner in which majority-minority districts function and the benefits that such districts have on interracial collaboration and integration as well as bipartisanship. Together, Representatives Carter, Sewell, Thompson, and Foushee have amassed nearly 50 years of Congressional experience, serving districts across four different states.

Based on the totality of their experiences, *amici* know that majority-minority districts can and do advance interracial communication and integration as well as bipartisanship amongst elected officials. Although Appellees take issue with the creation of a new majority-minority district in Louisiana, the truth is that majority-minority districts foster benefits for both minority and majority communities alike, and can serve as catalysts to propel our country forward toward equality.

a. Majority-Minority Districts Foster Integration and Cross-Racial Communication.

Majority-minority districts and their representatives have eased racial tensions both within legislative and institutional levels and between representatives and their constituents. For one, statistics show an increase in majority-minority districts has led to an increase in minority representatives.⁶ Members of Congress,

6. Geoffrey Skelley, *How Majority-Minority Districts Fueled Diversity in Congress*, ABC NEWS: FIVETHIRTYEIGHT (Aug. 14, 2023, 2:14 PM), <https://fivethirtyeight.com/features/majority-minority-congressional-districts-diversity-representation/>.

including those who are minorities, share their experiences and concerns related to a myriad of political issues, many of which touch on the topic of race. These *amici* have witnessed and participated in such conversations, which have occurred both publicly and privately. These *amici* have shared their own experiences and concerns with respect to race with people on both sides of the political aisle and of various races. These conversations do not always come with ease or bear immediate fruit. But these *amici* have witnessed that over time, the representation and dialogue incubated by majority-minority districts have led to meaningful communication and mutual respect amongst legislators.

And not only do majority-minority districts fuel cross-racial communication within the walls of Congress, they also promote cross-racial communication between representatives and the people they represent. Majority-minority districts are defined as those in which the “total population is less than 50 percent non-Hispanic white[.]”⁷ Representatives of such districts are required to listen to, understand, and advocate for the needs of all of their constituents—minority and non-minority constituents alike. In this way, majority-minority districts foster cross-racial dialogue because they encourage minority representatives of majority-minority districts to engage in dialogue with their non-minority constituents. These *amici* know that representatives of majority-minority districts provide outstanding constituent services to all of their constituents, irrespective of race.

7. *Id.*

And not all representatives of majority-minority districts look like the majority of constituents they represent. Representatives Shri Thanedar (MI-13), Jim Costa (CA-16), Steven Cohen (TN-09), Ed Case (HI-01), Michael Cloud (TX-27), and David Valadao (CA-21) all represent majority-minority districts, but are not minorities themselves. While they may not be part of the majority that makes up their constituency, they represent all of their constituents as a whole—both those that are part of the district’s majority as well as its minority—and do so effectively. As Representative Thanedar has stated, he has to do his best to understand the history and the legacy of the people that he represents, and to do so, it is important to him to be open to talking to everyone.⁸ The diversity of representatives of majority-minority districts exemplify another way in which those districts encourage interracial communication.

b. Majority-Minority Districts Advance Bipartisan Cooperation.

Majority-minority districts also foster bipartisan cooperation in that representatives of such districts regularly reach across the aisle to negotiate and achieve the goals of their constituents. *Amici* here do this work every day. Representative Troy Carter certainly is no stranger to bipartisan work. He has introduced bipartisan

8. See Malachi Barrett, *Thanedar Assures Black Detroiters: ‘This Seat is Owned by the People’*, BRIDGE DETROIT (Aug. 7, 2022, 2:51 PM), <https://www.bridgedetroit.com/thanedar-assures-black-detroiters-this-seat-is-owned-by-the-people/>.

legislation to expunge marijuana convictions,⁹ increase Louisiana’s share of offshore oil and gas revenues,¹⁰ and require the Department of Transportation to take action to prevent disabled roadside vehicle accidents.¹¹ Representative Carter has also secured more than \$70 million in federal funding for the Port of Orleans, which then-governor John Bel Edwards regarded as a “testament to the great things that can happen” with bipartisan efforts in Louisiana.¹²

Representative Sewell ranks in the top 25 percent of all of the members of the House of Representatives

9. A.J. Herrington, *U.S. Lawmakers File Bipartisan Bill to Expunge Marijuana Convictions*, FORBES (July 5, 2024, 3:01 PM), <https://www.forbes.com/sites/ajherrington/2024/07/05/us-lawmakers-file-bipartisan-bill-to-expunge-marijuana-convictions/>.

10. Representatives Steve Scalise & Troy Carter, *Louisiana should get its fair share of revenues from offshore energy—wind included*, THE ADVOCATE (July 21, 2022), https://www.theadvocate.com/baton_rouge/opinion/article_4582356c-0845-11ed-86ff-e7c526788108.html.

11. Michael Scheidt, *US rep. for Louisiana wants to help stop injuries, deaths tied to roadside accidents*, FOX 59 (Sept. 16, 2024, 6:41 PM), <https://fox59.com/news/us-rep-for-louisiana-wants-to-help-stop-injuries-deaths-tied-to-roadside-accidents/> (quoting Representative Rudy Yakym (IN-2) as saying “I am proud to partner with Congressman Carter on this commonsense, bipartisan legislation.”).

12. Mike Schuler, *Port of New Orleans Receives Federal Funding for New Mississippi River Container Terminal*, GCAPTAIN (Dec. 26, 2023), <https://gcaptain.com/port-of-new-orleans-receives-federal-funding-for-new-mississippi-river-container-terminal/>.

with respect to bipartisanship.¹³ She has worked with Republican representatives from Alabama to introduce a bill seeking federal recognition of the Alabama Black Belt National Heritage Area,¹⁴ and has worked with Senator Richard Shelby to expand the Port of Mobile—a major seaport in Alabama.¹⁵ Representative Sewell collaborated with Representative Bradley Byrne to promote and protect historically black colleges and universities (“HBCUs”), an effort that led to the development of a “Congressional HBCU Caucus.”¹⁶ Representative Sewell has also led and participated in a host of other bipartisan efforts, further demonstrating the critical role that majority-minority districts and their representatives play in championing bipartisanship.¹⁷

13. The Lugar Center, *The Lugar Center – McCourt School of Bipartisan Index, 2023 House Scores*, <https://www.thelugarcenter.org/ourwork-Bipartisan-Index.html> (last visited Dec. 23, 2024).

14. GovTrack, *H.R. 3222: Alabama Black Belt National Heritage Area Act*, <https://www.govtrack.us/congress/bills/117/hr3222/cosponsors> (last visited Dec. 23, 2024).

15. Todd Stacy, *Deep and Wide: Alabama delegation unanimous in support of Mobile channel improvements*, ALABAMA DAILY NEWS (Sept. 10, 2018), <https://aldailynews.com/deep-and-wide-alabama-delegation-unanimous-in-support-of-mobile-channel-improvements/>.

16. Tiffany Thomas Smith, *Alabama congressional delegates join bipartisan effort to boost HBCUs*, ALABAMA TODAY (Apr. 28, 2015), <https://altoday.com/archives/1401-alabama-congressionaldelegates-join-bipartisan-effort-to-boost-hbcus>.

17. *See, e.g.*, Press Release, Representative Terri Sewell, On National Rural Health Day, Reps. Sewell and Miller Introduce Bipartisan Legislation to Support Rural Hospitals (Nov. 21,

Representative Thompson’s work demonstrates how majority-minority districts further bipartisanship too. Representative Thompson introduced the 9/11 Commission Recommendations Act, which was co-sponsored by over 100 representatives—Republicans and Democrats alike—and was signed into law.¹⁸ Representative Thompson also introduced bipartisan legislation to ensure that transportation security officers are afforded the same rights and protections as other federal workers.¹⁹

And *amici* are not alone. Other representatives of majority-minority districts have demonstrated a commitment to working with those fostering bipartisanship. Representative Jim Clyburn (SC-6) has penned an op-ed arguing that “[a] bipartisan way

2024), <https://sewell.house.gov/2024/11/on-national-rural-health-day-reps-sewell-and-miller-introduce-bipartisan-legislation-to-support-rural-hospital> (discussing the bipartisan legislation Representative Sewell introduced to support rural hospitals); Meghashyam Mali, *Pelosi leads delegation on Afghanistan visit*, THE HILL (May 13, 2012), <https://thehill.com/policy/international/114216-pelosi-leads-delegation-on-afghanistan-visit/> (discussing the Congressional delegation, including Representative Sewell, that visited Afghanistan to meet with American servicemembers and discuss security and women’s issues with local officials).

18. *About Ranking Member Thompson*, COMMITTEE ON HOMELAND SECURITY, <https://democrats-homeland.house.gov/about/ranking-member> (last visited Dec. 23, 2024).

19. Press Release, Bennie Thompson and Brian Schatz, Thompson and Schatz Introduce Bipartisan Legislation to Improve TSA’s Frontline Workforce (May 14, 2024), <https://democrats-homeland.house.gov/news/legislation/thompson-and-schatz-introduce-bipartisan-legislation-to-improve-tsas-frontline-workforce>.

forward is the salve we need to heal this fractious political system.”²⁰ Representative Sanford Bishop (GA-2), who ranks in the top 15 percent of all members of the House in bipartisanship, introduced bipartisan legislation to establish Georgia’s first national park at Ocmulgee Mounds.²¹

* * *

Louisiana’s history demonstrates why majority-minority districts are important in our country. Despite Louisiana’s consistently large Black population, in the 212 years that Louisiana has been a state, it has only had a total of five Black congressional representatives.²² On the eve of Louisiana’s statehood, nearly half of Louisiana’s

20. Jim Clyburn, *A time for bipartisanship*, NEW PITTSBURGH COURIER (Oct. 20, 2023), <https://newpittsburghcourier.com/2023/10/20/clyburn-a-time-for-bipartisanship/>.

21. The Lugar Center, *The Lugar Center—McCourt School of Bipartisan Index, 2023 House Scores*, <https://www.thelugarcenter.org/ourwork-Bipartisan-Index.html> (last visited Dec. 23, 2024) (listing Representative Bishop 63 out of the 436 ranked representatives); Jessica Payne, *Will Macon be home to GA’s first national park? This bipartisan bill would make it happen*, THE TELEGRAPH (May 1, 2024), <https://www.macon.com/news/local/article288187575.html> (discussing the park at Ocmulgee Mounds and quoting Macon-Bibb Mayor Lester Miller as stating, “[t]his bipartisan effort is what we so desperately need all across America”).

22. See Wikipedia, *List of African-American United States representatives*, https://en.wikipedia.org/wiki/List_of_African-American_United_States_representatives (last updated Nov. 30, 2024).

population was reported to be Black.²³ The same was true just before the Civil War.²⁴ And just last year, 32 percent of Louisianians identified themselves as Black to the United States Census Bureau.²⁵ Notwithstanding the continuous presence of Black Louisianians, the first Black person that ever represented Louisiana in Congress was Charles E. Nash who held office during the Reconstruction era (1867–1877).²⁶ But even in that era “[a]s newly registered black voters propelled the Republican party to electoral victories across Louisiana, irate whites responded with increased terror,” which ultimately contributed to the end of the Reconstruction era.²⁷

The next time that a Black person represented one of Louisiana’s Congressional districts was in 1991, just following the 1982 VRA amendments.²⁸ In 1991, William

23. Bill Quigley & Maha Zaki, *The Significance of Race: Legislative Racial Discrimination in Louisiana, 1803–1865*, 24.2 S. U. L. Rev. 145, 148 (1997) (“By 1810 the census showed 45,135 whites, 7,585 free persons of color, and 4,660 slaves residing in the Territory of Orleans.”).

24. *Id.* at 157 n.88 (1997).

25. *QuickFacts Louisiana*, UNITED STATES CENSUS BUREAU (July 1, 2023) <https://www.census.gov/quickfacts/LA>.

26. See Wikipedia, *List of African-American United States representatives*, https://en.wikipedia.org/wiki/List_of_African-American_United_States_representatives (last visited Dec. 23, 2024).

27. Quigley, *supra* note 23, at 18, 25.

28. See Wikipedia, *List of United States representatives from Louisiana*, https://en.wikipedia.org/wiki/List_of_United_States_representatives_from_Louisiana (last visited Dec. 23, 2024).

Jefferson was elected to represent Louisiana's 2nd District in Congress.²⁹ The 2nd District had just been drawn as a majority-minority district in 1984.³⁰ Representative Carter represents that district today.

Today, there are 22 Congressional districts in the United States with a Black majority.³¹ These districts are in all geographic areas of the country and in both states that typically lean Democratic and those that often lean Republican.³² Each of these districts plays an important role in increasing racial integration, cross-racial communication, and bipartisanship. These districts also give meaningful representation to communities that have historically been disenfranchised. All of these districts' representatives aim to advocate for their constituents—irrespective of their race or political leanings.

Accordingly, *amici* ask this Court to review the ways in which majority-minority districts function and the manner in which they have spurred and can continue to spur the change our country needs.

29. *See id.*

30. *See* Wikipedia, *Louisiana's 2nd congressional district*, https://en.wikipedia.org/wiki/Louisiana%27s_2nd_congressional_district#cite_ref-5 (last visited Dec. 23, 2024).

31. *See* Wikipedia, *List of majority-minority United States congressional districts*, https://en.wikipedia.org/wiki/List_of_majority-minority_United_States_congressional_districts (last visited Dec. 23, 2024).

32. *See id.*

CONCLUSION

For the foregoing reasons, this Court should deny Appellees' motion, note probable jurisdiction, and reverse.

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