

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

DR. DOROTHY NAIRNE, JARRETT
LOFTON, REV. CLEE EARNEST LOWE,
DR. ALICE WASHINGTON, STEVEN
HARRIS, ALEXIS CALHOUN, BLACK
VOTERS MATTER CAPACITY
BUILDING INSTITUTE, and THE
LOUISIANA STATE CONFERENCE OF
THE NAACP,

Plaintiffs,

v.

R. KYLE ARDOIN, in his official capacity
as Secretary of State of Louisiana,

Defendant.

Civil Action No. 3:22-cv-00178
SDD-SDJ

PLAINTIFFS' MOTION TO VACATE STAY

Plaintiffs, Dr. Dorothy Nairne, Jarrett Lofton, Rev. Clee Earnest Lowe, Dr. Alice Washington, Steven Harris, Alexis Calhoun, Black Voters Matter Capacity Building Institute, and the Louisiana State Conference of the NAACP, by and through undersigned counsel, move this court for an order vacating the stay of proceedings granted on August 30, 2022.

For the reasons stated in the accompanying memorandum in support, Plaintiffs respectfully request that this Court grant the motion to vacate the stay of proceedings. And for the reasons explained in Plaintiffs' simultaneously-filed motion for an expedited briefing schedule, Plaintiffs request that the Court resolve this motion on an expedited basis.

Date: June 9, 2023

Respectfully submitted,

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**Pro Hac Vice Motion Forthcoming