

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

<hr/>)	
NAIRNE, <i>et al</i> ,)	
)	
	Plaintiffs,)	
v.)	Docket No. 3:22-cv-0178-SDD-SDJ
)	
)	
ARDOIN, <i>et al</i> .)	
)	
	Defendants,)	
<hr/>)	

MOTION FOR EXPEDITED CONSIDERATION

NOW INTO COURT, through undersigned counsel, come Plaintiffs to request expedited consideration of their *Motion to Move the Scheduling Conference to an Earlier Date in Order to Prevent a Situation in Which Final Judgment Comes Too Close to the Election Deadlines*. (“Motion”)

The Motion requests an order move forward the scheduling conference to late May 2022. The elections that are the subject of this litigation fall on the latter half of the 2023 calendar. In order to reach a final judgment before those deadlines in time to avoid the risk of potentially coming up against the deadlines, trial would ideally begin early 2023 to allow plenty of time for the appellate process to run its course during the spring and summer of 2023.

In order to move this case forward, Plaintiffs filed a motion to move up scheduling conference with an eye towards expediting this case more generally.

The motion will not be considered until June 6 at the earliest. Therefore, the current timeline does not accommodate the scheduling adjustment requested in the motion. Hence, the need for expedited consideration.

WHEREFORE, for these reasons and any other others apparent to this Court, Plaintiffs request that their motion be heard on an expedited basis.

DATED: May 18, 2022

Respectfully submitted,

/s/ John Adcock
JOHN ADCOCK
Adcock Law LLC
Louisiana Bar No. 30372
3110 Canal Street
New Orleans, LA 701119
Tel: (504) 233-3125
Fax: (504) 308-1266
Email: jnadcock@gmail.com

/s/ Ron Wilson
Louisiana Bar No. 13575
701 Poydras Street, Ste. 4100,
New Orleans, LA 70139
Tel: (504) 525-4361
Fax: (504) 525-4380
Email: cabral2@aol.com

/s/ Sarah Brannon
Sarah Brannon*
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005
sbrannon@aclu.org

Sophia Lin Lakin*
T. Alora Thomas*
Samantha Osaki*
American Civil Liberties Union Foundation

125 Broad Street, 18th Floor
New York, NY 10004
slakin@aclu.org
athomas@aclu.org
sosaki@aclu.org

/s/ Nora Ahmed

Nora Ahmed*
N.Y. Bar. No. 5092374
Megan E. Snider
LA. Bar No. 33392
ACLU Foundation of Louisiana
1340 Poydras St.
St. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
msnider@laaclu.org
NAhmed@laaclu.org

/s/ Michael de Leeuw

Michael de Leeuw***
Amanda Giglio***
Jacqueline Green**
Cozen O'Connor
3 WTC, 175 Greenwich St.
55th Floor
New York, NY 10007
MdeLeeuw@cozen.com
AGiglio@cozen.com
JGreen@cozen.com

/s/ Leah Aden

Leah Aden*
Stuart Naifeh*
Victoria Wenger*
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street
5th Floor
New York, NY 10006
(212) 965-2200
laden@naacpldf.org
snaifeh@naacpldf.org
vwenger@naacpldf.org

Andrew H. Stanko***
Daniel Brobst***
Cozen O'Connor
Liberty Place, 1650 Market St.
Suite 2800
Philadelphia, PA 19103
AStanko@cozen.com
DBrobst@cozen.com

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

Attorneys for Plaintiffs

Janette Louard*
Anthony Ashton*
Anna Kathryn Barnes*
NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF COLORED PEOPLE (NAACP)
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-5777
jlouard@naacpnet.org

aashton@naacpnet.org
barnes@naacpnet.org

Attorneys for Plaintiff Louisiana State Conference of the NAACP

*Admitted Pro hac vice
**Bar admission forthcoming
*** Pro hac vice motion forthcoming

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

_____)	
NAIRNE, <i>et al</i> ,)	
)	
	Plaintiffs,)	
v.)	Docket No. 3:22-cv-0178-SDD-SDJ
)	
)	
ARDOIN, <i>et al</i> .)	
)	
	Defendants,)	
_____)	

**MEMORANDUM IN SUPPORT OF
MOTION FOR EXPEDITED CONSIDERATION**

NOW INTO COURT, through undersigned counsel, come Plaintiffs who file this memorandum in support of their request for expedited consideration of their *Motion to Move the Scheduling Conference to an Earlier Date in Order to Prevent a Situation in Which Final Judgment Comes Too Close to the Election Deadlines*. (“Motion”)

The Motion requests an order move forward the scheduling conference to late May 2022. The elections that are the subject of this litigation fall on the latter half of the 2023 calendar. In order to reach a final judgment before those deadlines in time to avoid the risk of potentially coming up against the deadlines, trial would ideally begin early 2023 to allow plenty of time for the appellate process to run its course during the spring and summer of 2023.

In order to move this case forward, Plaintiffs filed a motion to move up scheduling conference with an eye towards expediting this case more generally.

The motion will not be considered until June 6 at the earliest. Therefore, the current timeline does not accommodate the scheduling adjustment requested in the motion. Hence, the need for expedited consideration.

WHEREFORE, for these reasons and any other others apparent to this Court, Plaintiffs request that their motion be heard on an expedited basis.

DATED: May 18, 2022

Respectfully submitted,

/s/ John Adcock
JOHN ADCOCK
Adcock Law LLC
Louisiana Bar No. 30372
3110 Canal Street
New Orleans, LA 701119
Tel: (504) 233-3125
Fax: (504) 308-1266
Email: jnadcock@gmail.com

/s/ Ron Wilson
Louisiana Bar No. 13575
701 Poydras Street, Ste. 4100,
New Orleans, LA 70139
Tel: (504) 525-4361
Fax: (504) 525-4380
Email: cabral2@aol.com

/s/ Sarah Brannon
Sarah Brannon*
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005
sbrannon@aclu.org

Sophia Lin Lakin*
T. Alora Thomas*
Samantha Osaki*
American Civil Liberties Union Foundation

125 Broad Street, 18th Floor
New York, NY 10004
slakin@aclu.org
athomas@aclu.org
sosaki@aclu.org

/s/ Nora Ahmed

Nora Ahmed*
N.Y. Bar. No. 5092374
Megan E. Snider
LA. Bar No. 33392
ACLU Foundation of Louisiana
1340 Poydras St.
St. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
msnider@laaclu.org
NAhmed@laaclu.org

/s/ Michael de Leeuw

Michael de Leeuw***
Amanda Giglio***
Jacqueline Green**
Cozen O'Connor
3 WTC, 175 Greenwich St.
55th Floor
New York, NY 10007
MdeLeeuw@cozen.com
AGiglio@cozen.com
JGreen@cozen.com

/s/ Leah Aden

Leah Aden*
Stuart Naifeh*
Victoria Wenger*
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street
5th Floor
New York, NY 10006
(212) 965-2200
laden@naacpldf.org
snaifeh@naacpldf.org
vwenger@naacpldf.org

Andrew H. Stanko***
Daniel Brobst***
Cozen O'Connor
Liberty Place, 1650 Market St.
Suite 2800
Philadelphia, PA 19103
AStanko@cozen.com
DBrobst@cozen.com

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

Attorneys for Plaintiffs

Janette Louard*
Anthony Ashton*
Anna Kathryn Barnes*
NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF COLORED PEOPLE (NAACP)
4805 Mount Hope Drive
Baltimore, MD 21215
(410) 580-5777
jlouard@naacpnet.org

aashton@naacpnet.org
barnes@naacpnet.org

Attorneys for Plaintiff Louisiana State Conference of the NAACP

*Admitted Pro hac vice
**Bar admission forthcoming
***Pro hac vice motion forthcoming

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

_____)	
NAIRNE, <i>et al</i> ,)	
	Plaintiffs,)	
v.)	Docket No. 3:22-cv-0178-SDD-SDJ
)	
ARDOIN, <i>et al</i> .)	
	Defendants,)	
_____)	

ORDER

UPON CONSIDERATION of Plaintiff’s *Motion for Expedited Consideration* (“Motion”) of their *Motion to Move the Scheduling Conference to an Earlier Date in Order to Prevent a Situation in Which Final Judgment Comes Too Close to the Election Deadlines*;

IT IS ORDERED that the Motion is GRANTED.

The *Motion to Move the Scheduling Conference to an Earlier Date in Order to Prevent a Situation in Which Final Judgment Comes Too Close to the Election Deadlines* shall be considered on an expedited basis.

IT IS FURTHER ORDERED that Defendants will file their opposition to this Motion no later than May ____, 2022.

Done in New Orleans, Louisiana this ____ day of May, 2022.

HON. SCOTT D. JOHNSON
UNITED STATES MAGISTRATE JUDGE
MIDDLE DISTRICT OF LOUISIANA