

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

DR. DOROTHY NAIRNE, *et al.*,

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

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

CONSENT MOTION TO MODIFY THE COURT'S REMEDIAL DEADLINES

Defendant Nancy Landry, in her official capacity as Secretary of State of Louisiana, by and through undersigned counsel, files this Consent Motion to Modify the Court's July 17, 2024, Remedial Deadlines. Rec. Doc. 279. Having met and conferred, the Parties¹ jointly submit the proposed order attached as **Exhibit 1** and request the Court modify its remedial deadlines as follows:

- Exchange of the identities and resumes of experts from whom a party will submit a remedial map and/or an affirmative expert report: **May 12, 2025**.
- Exchange of affirmative expert reports of experts disclosed on May 12, 2025: **May 23, 2025**.
- Completion of fact discovery: **May 27, 2025**.
- Exchange of the identities and resumes of rebuttal experts from whom a party will submit a rebuttal to the remedial maps and/or expert reports disclosed on May 23, 2025: **May 30, 2025**.
- Exchange of rebuttal expert reports of experts disclosed on May 30, 2025: **June 13, 2025**.

¹ The parties include Plaintiffs, Defendant, and Intervenor-Defendants. The United States takes no position on the consent motion and proposed order.

- Exchange of surrebuttal expert reports rebutting expert reports disclosed on June 13, 2025: **June 20, 2025.**
- Completion of expert discovery: **July 9, 2025.**
- Deadline for motions in limine: **July 11, 2025.**

This Motion does not alter or affect the remedial hearing or the Court's pretrial conference dates, and the Parties do not seek any additional changes beyond those set forth herein.

Respectfully submitted this, the 9th day of May, 2025.

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*** Withdrawal Pending*

Counsel for Legislative Intervenors

CERTIFICATE OF SERVICE

I hereby certify that on this the 9th day of May, 2025, a copy of the foregoing document was filed electronically with the Clerk of Court via the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Phillip J. Strach

Phillip J. Strach