

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

DR. DOROTHY NAIRNE, JARRETT
LOFTON, REV. CLEE EARNEST LOWE,
DR. ALICE WASHINGTON, AND DR.
ROSE THOMPSON, 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

Chief Judge Shelly D. Dick

Magistrate Judge Scott D. Johnson

**MOTION TO CONVENE THREE-JUDGE COURT OR, IN THE ALTERNATIVE, TO
CERTIFY AN INTERLOCUTORY APPEAL**

NOW COMES Defendant R. Kyle Ardoin, in his official capacity as Secretary of State for the State of Louisiana, by and through undersigned counsel, and pursuant to 28 U.S.C. § 2284, respectfully moves this Court to convene a three-judge district court. In the alternative, Defendant moves this Court to certify the issue for interlocutory appeal pursuant to 28 U.S.C. § 1292 and stay the matter pending appeal.

In support of this Motion, Defendant concurrently files a Memorandum in Support detailing the reasons why this relief should be granted.

Respectfully submitted, this the 22 day of April, 2022.

/s/ Phillip J. Strach

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*Counsel for Defendant R. Kyle Ardoin, in his official
capacity as Secretary of State of Louisiana*

CERTIFICATE OF SERVICE

I hereby certify that on this 22 day of April, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which I understand will send a notice of electronic filing to all parties of record.

/s/ Phillip J. Strach

Phillip J. Strach