

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION

PHILLIP CALLAIS, LLOYD PRICE,  
BRUCE ODELL, ELIZABETH ERSOFF,  
ALBERT CAISSIE, DANIEL WEIR,  
JOYCE LACOUR, CANDY CARROLL  
PEAVY, TANYA WHITNEY, MIKE  
JOHNSON, GROVER JOSEPH REES,  
ROLFE MCCOLLISTER,

*Plaintiffs,*

v.

NANCY LANDRY, in her official capacity as  
Secretary of State of Louisiana,

*Defendant.*

Case No. 3:24-cv-00122-DCJ-CES-RRS

*District Judge David C. Joseph*  
*Circuit Judge Carl E. Stewart*  
*District Judge Robert R. Summerhays*  
  
*Magistrate Judge Kayla D. McClusky*

**THE STATE OF LOUISIANA’S MOTION TO INTERVENE**

The State of Louisiana, by and through Attorney General Elizabeth Murrill, does hereby move to intervene pursuant to Federal Rule of Civil Procedure 24. The Court should grant the State’s motion to intervene because (1) it satisfies the requirements of intervention as of right: (a) it is timely, (b) the State has an interest in the subject of the action, (c) the disposition of the action may substantially impair or impede the State’s interests, and (d) the State’s interests are inadequately represented by the existing parties; and (2) alternatively, the State satisfies the requirements of permissive intervention under Federal Rule of Civil Procedure 24.

The State has reached out counsel for Plaintiffs and the Secretary of State, and they do not oppose the State’s intervention.

For the reasons more fully set forth in the attached memorandum of law, the State of Louisiana respectfully requests that this Court GRANT its Motion to Intervene.

Respectfully submitted, this 20th day of February, 2024.

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*\* pro hac vice motion forthcoming*

/s/ Morgan Brungard  
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*Counsel for Proposed Intervenor-Defendant State  
of Louisiana*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 20th day of February 2024, the foregoing has been filed with the Clerk via the CM/ECF system that has sent a Notice of Electronic filing to all counsel of record.

/s/ Morgan Brungard  
Morgan Brungard