

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

TERREBONNE PARISH BRANCH NAACP,  
REVEREND VINCENT FUSILIER, SR.,  
LIONEL MYERS, WENDELL DESMOND  
SHELBY, JR., and DANIEL TURNER,

*Plaintiffs,*

v.

JOHN BEL EDWARDS, the GOVERNOR of the  
STATE OF LOUISIANA, in his official capacity,  
and JEFFREY MARTIN LANDRY, the  
ATTORNEY GENERAL for the STATE OF  
LOUISIANA, in his official capacity,

*Defendants.*

Civil Action. No. 3:14-cv-69-SSD-EWD

**PLAINTIFFS' CORRECTED MEMORANDUM REGARDING SPECIAL MASTER'S  
REPORT AND RECOMMENDED REMEDY (DOC. 396)**

Plaintiffs, Terrebonne Parish Branch NAACP, Reverend Vincent Fusilier, Sr., Lionel Myers, Wendell Desmond Shelby, Jr., and Daniel Turner (collectively, "Plaintiffs"), through their undersigned counsel, respectfully submit this corrected memorandum in response to the Special Master's Report and Recommended Remedy ("Special Master's Report"), Doc. 396, as permitted by this Court's orders, Docs. 385 at 4, 394, & 397. For the reasons explained below, Plaintiffs notify the Court that they do not object to the Special Master's recommended remedial redistricting plan ("Special Master Plan 2"). That plan will cure the long-standing statutory and constitutional violations by providing Plaintiffs and other Black voters in Terrebonne Parish with an equal opportunity to participate politically and elect representatives of their choice for elections for the 32nd Judicial District Court ("32nd JDC") for the first time since Louisiana created that state court in 1968.

## I. Liability Phase Overview

Plaintiffs filed this voting rights challenge to Louisiana’s discriminatory at-large method of electing members for the 32nd JDC under Section 2 of the Voting Rights Act, 52 U.S.C § 10301 (“Section 2”) and the Fourteenth and Fifteenth Amendments to the U.S. Constitution on February 3, 2014. Doc. 1. After an 8-day bench trial, and considering the testimony of 27 witnesses and over 350 exhibits, this Court concluded in a 91-page opinion that Louisiana’s at-large electoral method for members of the 32nd JDC, in combination with enhancing factors and racially polarized voting patterns (“RPV”), “deprives black voters of the equal opportunity to elect candidates of their choice in violation of Section 2, and it has been maintained for that purpose, in violation of Section 2 and the United States Constitution.” Doc. 289 at 2; *id.* at 46, 55-56, 76, 91. Indeed, this Court found: “there is clearly a Section 2 violation in this case.” *Id.* at 38; *see also id.* at 75-76 (“the Court has found a strong case of vote dilution”). This Court bifurcated the issues of liability and remedy. *Id.* at 91.

In determining liability, this Court made a number of other key findings that bear upon the current remedial phase:

- “Since 1997, the Terrebonne NAACP and black Terrebonne voters have advocated for a majority-black subdistrict. This advocacy has spanned six different legislative proposals.” *Id.* at 12; *see also id.* at 10, 70;
- “Since the late 1970s, the Terrebonne Parish Council has had a district electoral plan, which includes two majority black-subdistricts. The School Board also has a nine-district electoral plan which includes two majority-black subdistricts.” *Id.* at 16;

- Based on the plan offered by Plaintiffs to establish liability, the Illustrative Plan, “the black population is sufficiently numerous and geographically compact [in Terrebonne Parish] to comprise a majority of the voting age population in one single member district in a five-district plan for the 32nd JDC.” *Id.* at 17; *id.* at 26;
- “[D]istricting is hardly a science” and there will often be “more than one way to draw a district so that it can reasonably be described as meaningfully adhering to traditional principles.” *Id.* at 22;
- Plaintiffs’ “Illustrative Plan respects communities of interest,” *id.* at 28, “adequately minimizes precinct splits,” *id.* at 31, and “protects incumbent judges,” on the 32nd JDC. *Id.* at 31-32;
- “[T]he black population in [the majority-Black single-member] District 1 [in the Illustrative Plan] is sufficiently concentrated and compact, and the District itself adheres to traditional districting principles,” *id.* at 33; *see also id.* at 38;
- “Defendants’ argument—that the Plaintiffs cannot satisfy *Gingles* One because the Illustrative District is a racial gerrymander—is meritless.” *Id.* at 34;<sup>1</sup>
- Plaintiffs’ Illustrative Plan, as a potential remedy, would “be sufficiently effective in providing black voters a reasonable opportunity to elect a candidate of their choice,” based on the Court’s review of “the voting age populations of black and white voters in Illustrative District 1, the rates of black voter support for black

---

<sup>1</sup> The two primary reasons for this finding, according to this Court, were that: “the Court need not undertake an equal protection analysis,” at the liability stage, and, “even if this analysis were required, the Court finds that the [Illustrative] plan is not invalid under the Equal Protection Clause.” Doc. 289 at 34; *see also id.* at 36, 38-39. This is, in part, because the plan would satisfy strict scrutiny, as the Fifth Circuit has recognized that “compliance with Section 2 of the Voting Rights Act constitutes a compelling governmental interest.” *Id.* at 38 (citing *Clark v. Calhoun*, 88 F.3d 1393, 1406 (5th Cir. 1996)).

candidates / non-black voter support for black candidates, and the average turnout rates for black and white voters in Terrebonne.” *Id.* at 33-34 n. 187;<sup>2</sup>

- “Terrebonne elections are characterized by significant patterns of [RPV],” and “this pattern can be explained by race rather than other factors.” *Id.* at 41; *see also id.* at 55;
- “[S]even of the nine Senate Factors weigh in favor of a finding that at-large voting for the 32nd JDC interacts with social and historical factors to cause an inequality in the political process for black voters.” *Id.* at 52; *id.* at 76;
- Two of the most important of these Factors, RPV and “black electoral defeat over many years and for many positions,” weigh overwhelmingly in favor of a finding of vote dilution. *Id.* at 55, 60, 70;
- “[N]o black candidate who has faced opposition in Terrebonne has been elected to an at-large position, and black candidates have received incredibly minimal support from white voters, a pattern which has been consistent over the course of more than twenty years,” *id.* at 75-76;
- “[T]here is no [Louisiana] constitutional prohibition on district-based voting.” *Id.* at 73;
- [S]ubdistricts are now common in Louisiana, and a majority of the JDC judges in Louisiana are elected by subdistrict.” *Id.* at 74;

---

<sup>2</sup> Indeed, this Court found that: “[e]ven at current turnout rates for black voters, which are lower than the turnout for white voters, black voters would have a realistic opportunity to elect a candidate of their choice, albeit by a small margin.” Doc. 289 at 33-34 & n.187. Further, this Court recognized that it is appropriate to consider “the substantial increase in turnout of black voters that usually follows the creation of an opportunity district in its effectiveness analysis.” *Id.* (citation omitted).

- Prior to this litigation, the Louisiana Legislature has drawn black-majority subdistricts for the 32nd JDC as part of separate, unsuccessful bills. *Id.* at 81-83, 87; and,
- “District-based voting was rejected for the 32nd JDC on at least six occasions between 1997 and 2011. Taken as a whole, this timeline shows discriminatory intent.” *Id.* at 89.

## II. Remedial Phase Overview

On April 3, 2019 this Court appointed a Special Master to assist this Court by “proposing a legally sound remedy that conforms to this Court’s previous *Ruling* of August 17, 2017 and complies with the Federal and State Constitutions and the Voting Rights Act.” Doc. 385 at 2; Doc. 391; Doc. 396 at 1; Doc. 367 at 1. This Court provided that the “Special Master may consider all the evidence in making his recommendation to the Court and is free to develop his own plan if necessary.” Doc. 385 at 2; *see also* Doc. 392.

This Court appointed a Special Master after providing (a) Plaintiffs and Defendants, and (b) the Louisiana Legislature, at the behest of the parties, the opportunity to propose a remedial redistricting plan for the 32nd JDC. *See* Docs. 297 & 332; *see also* Doc. 318 at 2 n.4; Doc. 320 at 2; Doc. 323 at 2; Doc. 324 at 2.

Plaintiffs accepted the Court’s opportunity and offered the Illustrative and Alternative Plans as two potential remedies. Doc. 319 at 9-11; Doc. 319-1.

Neither Defendant Governor nor Defendant Attorney General offered any proposed remedy, including an alternative to a single-member redistricting plan. *See generally* Docs. 323-24. Instead, Defendant Attorney General has resorted to merely and primarily contending that developing a remedial plan consistent with traditional redistricting principles is impossible, despite

that (i) the Legislature in past years, as noted above, (ii) this Court, and, (iii) most recently, the Special Master have shown otherwise. *See, e.g.*, Doc. 323 at 2 & 11-15; Doc. 343 at 1 & 12-18; *see also* Doc. 396 at 4.

Moreover, since its August 2017 *Ruling*, this Court has provided the Louisiana Legislature with at least two opportunities during regular sessions to respond to this Court's finding of constitutional and statutory violations. In advance of the 2018 legislative session, as this Court noted, "[t]he Parties represented to the Court ... that they all believed the Legislature might take action pursuant to the Court's *Ruling* and moot the remedy phase of this matter." Doc. 364 at 2 n.6; *see also* Doc. 333-1 at 3-4 (describing Plaintiffs' counsel's understanding that a member of Terrebonne's local delegation planned to file a bill related to the 32nd JDC). However, Attorney General Attorney General himself met with Terrebonne's legislative delegation members and other officials and urged them not to introduce any legislation to respond to this Court's liability ruling. Doc. 333-1 at 5; Doc. 349-1 at 2.

And this came to pass. The Legislature did not adopt any bill during the 2018 regular session in response to this Court's *Ruling*. Doc. 333-1 at 3; Doc. 340 at 1-2; Doc. 342 at 1. Notably, the Chair of Louisiana's Legislative Black Caucus sponsored a bill that responded to this Court's ruling. Doc. 333-1 at 5. But that bill failed in committee with no amendments to it, though the Black members present at the hearing, who are elected from majority-Black single-member districts, voted in support of the bill. *Id.* at 3, 8-9; *see also* 364 at 2. That represented the *seventh* time since 1997 during which the Louisiana Legislature maintained the discriminatory electoral system for the 32nd JDC. Doc. 333-1 at 9; Doc. 342 at 2; *Cf.* Doc. 289 at 90 (finding that "this pattern shows that a motivating purpose in maintaining the at-large electoral scheme for the 32nd

JDC was to limit the opportunity of black individuals to participate meaningfully and effectively in the political process to elect judges of their choice”).

During the 2019 regular session, no bill related to the 32nd JDC procedurally made it up for consideration.<sup>3</sup>

Overall, the failure to respond to the Court’s ruling stands in stark contrast to how the Louisiana Legislature and Governor acted following liability findings stemming from judicial redistricting litigation brought in the 1980s. Doc. 289 at 73. As this Court recognized, decades ago, the Legislature and the Governor acted in response to post-trial findings of Voting Rights Act violations by “propos[ing] a package of measures to change the electoral method for judges which included the use of [majority-Black] subdistricts to elect district court judges.” *Id.*

The regular legislative session is scheduled to end on June 6, 2019. Thus, two legislative sessions over nearly two years will have passed without any legislative fix to the violations.

#### **A. Special Master’s Report**

The Special Master’s Report considered four potential remedial districting plans. Doc. 396 at 3, 13. These plans included two plans developed by Plaintiffs (*i.e.*, the Illustrative and Alternative plans), as well as two plans developed by the Special Master (*i.e.*, Special Master’s Plans 1 and 2). *Id.* at 3.

In reviewing these remedial redistricting plans, the Special Master considered a mountain of evidence and other information considered by this Court and provided by the parties and their experts. *Id.*; *see also id.* at 4-5. The Special Master also made “findings that guided the evaluation

---

<sup>3</sup> During the 2019 and 2018 legislative sessions, judicial redistricting bills related to the 24th JDC and juvenile court for Jefferson Parish were introduced by members of Louisiana’s Legislative Black Caucus. *See* House Bill 516 (2019 Reg. Sess.), <http://www.legis.la.gov/legis/ViewDocument.aspx?d=1122136>; Doc. 333-1 at 9-10 & n.6.

and drafting of potential remedial plans, and the eventual selection of a recommendation.” *Id.* at 3-4. For example, the Special Master found that each of these four plans:

- “includes a majority black district which generally complies with traditional redistricting criteria.” *Id.* 396 at 3; *see also id.* at 7, 13; and,
- “[t]he majority black district in each plan is likely to provide an effective remedy,” *id.* at 4 *see also id.* at 12-13.

The Special Master ultimately recommended that this Court adopt Special Master’s Plan 2. *Id.* at 4, 13. This plan is based on Terrebonne Parish Council districts, and, thus, “the consistent grouping of communities should allow for easier election administration and less confusion among voters in the initial election by district.” *Id.* at 13. Special Master’s Plan 2, as compared to the plans developed by Plaintiffs, “include[s] the same communities in District 1,” the majority black district, but, according to the Special Master, “minimiz[es] precinct splits and respect[s] communities of interest in the other four Districts.” *Id.* at 4; *see also id.* at 7-11.<sup>4</sup>

Plaintiffs file this response to notify the Court that Plaintiffs do not object to the Special Master’s proposed redistricting plan (Special Master’s Plan 2) because Plaintiffs agree that it will cure the existing Section 2 and Fourteenth and Fifteenth Amendment violations by providing Black voters in elections for the 32nd JDC with an equal opportunity to participate in the political process and elect representatives of their choice. Thus, Special Master’s Plan 2 is consistent with Section

---

<sup>4</sup> Plaintiffs do not concede the Special Master’s finding that “Plaintiffs’ Illustrative Plan splits more precincts than necessary,” in light of this Court’s finding that the Illustrative Plan “adequately minimizes precinct splits,” as referenced *infra*. Plaintiffs also do not concede the Special Master’s finding that “Plaintiffs’ Illustrative and Alternative Plans each combine distant and not well-connected communities in white-majority District 3,” one of the five districts, since, as the Court acknowledged, these communities already are brought together in House District 51 under the 2011 State House Plan. *Cf.* Doc. 289 at 23-25 *with* Doc. 396 at 10-11, 13. While such state legislators provide direct constituent services to residents of the districts from which they are elected, the five trial court 32nd JDC judges serve all residents over whom the 32nd JDC has jurisdiction.

2, which, as this Court recognized, “is not meant to guarantee electoral success for minority-preferred candidates, but rather,” to provide an equal opportunity for minority voters to elect their preferred candidates. Doc. 289 at 5.

Specifically, Special Master’s Plan 2 includes five-single member districts for electing five 32nd JDC members, including a remedial majority-Black single-member district (District 1). The Special Master found that “[a] single member district election system including a majority black district is the most appropriate remedy.” Doc. 396 at 3; *see also id.* at 4 & n.4. That finding is consistent with U.S. Supreme Court and Fifth Circuit precedent previously cited by Plaintiffs that provides that single-member districts are the preferred remedies in court-ordered plans. *See* Doc. at 319 at 7-8; Doc. 333-1 at 11-12. Indeed, the Fifth Circuit, in *McMillan v. Escambia County, Florida*, acknowledged that the U.S. Supreme Court “has generally disapproved of multimember district and at-large election schemes as components of a judicially fashioned remedy and has admonished district courts to employ single-member districts.” *Id.* at 7 (citing to 688 F.2d 960, 971 (5th Cir. 1982)). A court-ordered remedial plan that includes a mix of single-member districts and at-large seats *requires justification*. *Id.* (citing *Corder v. Kirksey*, 585 F.2d 708, 713-15 (5th Cir. 1978)); *see also* Doc. 333-1 at 11-12 (citing *Citizens for Good Gov’t v. City of Quitman*, 148 F.3d 472, 477 (5th Cir. 1998)). Moreover, by using single-member districts for all seats on the 32nd JDC, the Special Master Plan 2’s is consistent with remedies that other courts have provided; by contrast, courts have rejected plans that create one or two single-member districts while keeping the basic at-large system intact. *See* Doc. 319 at 11-12.

Finally, the recommendation to use a single-member remedial redistricting plan is consistent with the methods of election for other judicial districts in Louisiana. Currently, at least

the 18th, 27th, and 40th JDCs in Louisiana use only single-member subdistricts to elect judicial members. *See id.* at 12-13; Doc. 333-1 at 12.

Ultimately, District 1, the majority-Black district in Special Master Plan 2, will provide Plaintiffs and other Black voters in Terrebonne with the ability to elect a candidate of choice in each election for the 32nd JDC.

### **1. Incumbent Protection and Division Assignments**

As this Court has recognized, under Louisiana, living with Terrebonne Parish is a sufficient residential qualification for a candidate for one of the 32nd JDC's five divisions (A-E). Doc. 289 at 31 ("Louisiana Law 'does not require a candidate for a division of a district court to be domiciled within the precinct boundaries or any other geographic boundaries of that division.'").<sup>5</sup> For the next regularly scheduled election for the 32nd JDC in 2020, only three of the incumbent sitting judges for the 32nd JDC are eligible to run. *Id.*<sup>6</sup> These judges are assigned to divisions C, D, and E. The other divisions, A and B, will be open seats in the 2020 election.

*First*, as the Court acknowledges, the incumbent judges in divisions C, D, and E that should be eligible to run again in 2020 live in close proximity to each other. Under the Illustrative Plan, it is undisputed, as this Court found, that the "Illustrative Plan will not require current incumbents to run against each other." *Id.* at 31-32. However, under the Special Master's Plan 2, Plaintiffs recognize that the three incumbent judges would all reside in District 3. But these incumbents will not be forced to compete against one another; under Louisiana law, it will continue to be the case that these potential candidates, like any other candidate, can qualify for a 32nd JDC seat, including

---

<sup>5</sup> This Court cited *Snyder v. Perilloux*, 198 So. 3d 237, 241 (La. Ct. App. 5th Cir. 2016) (en banc) *aff'd in relevant part and rev'd in part on other grounds*, 197 So. 3d 692 (La. 2016), in which the court found that a candidate who did not reside in the subdistrict for Division B of the 40th JDC, but resided in the 40th JDC, was qualified to run for that seat.

<sup>6</sup> Plaintiffs' understanding is that qualifying for 32nd JDC elections is on July 15-17, 2020; primary and general elections are on November 3 and December 5, 2020, respectively. Doc. 358-6.

District 1 in the Special Master's Plan 2, if they reside in the territorial jurisdiction of the 32nd JDC (*i.e.*, Terrebonne Parish).<sup>7</sup>

Although Plaintiffs accept that any incumbent judge (or any other statutorily qualified candidate) may run in District 1 under Special Master's Plan 2, it is commonly understood that incumbents generally receive a material advantage on Election Day.<sup>8</sup> Plaintiffs, therefore, request that this Court order that incumbency not be noted on the ballot for this initial election for District 1, to avoid giving an incumbent advantage to officials who have secured office under a system that this Court determined violates federal law.

*Second*, Plaintiffs also request that District 1 in Special Master's Plan 2 be assigned to Division A or B, one of the open seats in 2020. This is consistent with how Louisiana has historically assigned newly developed majority-Black districts. Indeed, Plaintiffs' counsel has not been able to identify any instance when a minority judge who had not proven to be the candidate of choice of minority voters or a white judge who wanted to run again was assigned to a newly created majority-minority subdistrict. *See* Doc. 333-1 at 5 n.2. In short, almost always, a newly developed majority-Black judicial district in Louisiana has been assigned to an open judicial seat. *Cf. Garza v. Cty. of Los Angeles*, 918 F.2d 763, 776 (9th Cir. 1990) (acknowledging that the district court objected to a remedial plan that placed the "Hispanic majority district in a section controlled

---

<sup>7</sup> Protecting incumbents, moreover, is a relatively minimal redistricting concern, particularly in the context of court-ordered plans. *See, e.g., Wyche v. Madison Parish Policy Jury*, 769 F.2d 265, 268 (5th Cir. 1985) (*per curiam*) ("Many factors, such as the protection of incumbents, that are appropriate in the legislative development of an apportionment plan have no place in a plan formulated by the courts."); *see also Dillard v. City of Greensboro*, 956 F. Supp. 1576, 1580–82 (M.D. Ala. 1997) (concurring with the Special Master's view "that incumbency protection is a legitimate factor, but one that is subordinate to the traditional districting criteria" that the Special Master was required to consider").

<sup>8</sup> Defendants' expert, Angele Romig, also acknowledges the power of incumbency in Louisiana. Defs.' Trial Ex. 4, Decl. of Angele C. Romig, at 10 (of the thousands of judicial elections considered over a 24-year period, "95.0% of incumbents won their contests or finished within the top two of the field and proceeded to a runoff").

by a powerful incumbent, rather than in the one section that had a naturally occurring open seat, an open seat that was ‘in the heart of the Hispanic core’’).

### **B. Remedial Implementation Schedule**

This Court ruled on liability on August 17, 2017, but this voting rights issue has been percolating for more than two decades. Plaintiffs filed this lawsuit on February 3, 2014, only after years and years of attempting to obtain relief through the political process—attempts that even stretched beyond this Court’s liability ruling into the last few months. Plaintiffs urge this Court to use its equitable power to order the remedial plan’s implementation for the elections of all five members of the 32nd JDC in 2020. There is sufficient time for this Court to enter a final remedial order in this case, for the relevant state actors to notify voters of Terrebonne Parish of the changes in voting districts, precincts, or polling places, finalize all ballots, and hold a 2020 election.

The Voting Rights Act contemplates that federal courts will exercise broad discretionary authority to provide a *full and complete* remedy to an underlying violation. *See* S. Rep. No. 97-417, 97th Cong., 2nd Sess. 31 (1982), reprinted in 1982 U.S.C.C.A.N. 208 (“The court should exercise its traditional equitable powers to fashion the relief so that it *completely* remedies the prior dilution of minority voting strength and *fully* provides equal opportunity for minority citizens to participate and to elect candidates of their choice”) (emphasis added); *Upham v. Seamon*, 456 U.S. 37, 40-42 (1982). Indeed, “the court has not merely the power but the duty to render a decree which will so far as possible eliminate the discriminatory effects of the past as well as bar like discrimination in the future.” *Louisiana v. United States*, 380 U.S. 145, 154 (1965).

### **III. Procedural Next Steps, Including Other Requested Relief**

This Court has indicated its intention to rule on the Special Master’s Report and Recommended Remedy as soon as practicable in June 2019. Doc. 385 at 4.

Plaintiffs refer this Court to steps that other courts adjudicating similar cases have taken toward final judgment. For example, in a Section 2 case arising in Georgia, the trial court issued an injunction, ordered the adoption and implementation of a remedial plan drawn in conjunction with a technical advisor, and administratively closed the case. The court, however, retained jurisdiction to ensure proper implementation of the remedial order and to afford the parties the opportunity to seek further relief. *See* Doc. 358-5 (attaching Order, ECF No. 179, *Georgia State Conference of the NAACP v. Fayette Cty. Bd. of Comm'rs*, 3:11-cv-123-TCB (Feb. 18, 2014)). The court, thereafter, entered final judgment. ECF No. 183, *Georgia State Conference of the NAACP v. Fayette Cty. Bd. of Comm'rs*, 3:11-cv-123-TCB (Mar. 13, 2014)), after which the plaintiffs as prevailing parties moved for attorneys' fees, costs and expenses and appellate proceedings followed.

In a Texas case, which like this case raised both Section 2 and constitutional claims, the trial court ordered the parties to propose an injunctive order. *Patino v. Pasadena*, 230 F. Supp. 3d 667, 730 (S.D. Tex. Jan. 6, 2017). This followed the trial court's issuance of its opinion establishing liability, ordering a remedy because of an imminent election, and retaining jurisdiction under the Voting Rights Act. *Id.* Subsequently, the trial court entered final judgment and an order of injunction. *Patino*, 2017 WL 10242075 (S.D. Tex. Jan. 16, 2017).

Finally, in a case that, as here, required a Special Master to work in conjunction with the trial court, that court issued a decision and order, adopting the Special Master's remedial recommendations. *Navajo Nation v. San Juan Cty.*, 2017 WL 6547635 at \*\*1, 19 (C.D. Utah Dec. 21, 2017). The court subsequently entered final judgment. Judgment, ECF No. 448, *Navajo Nation v. San Juan Cty.*, 2:12-cv-0039 (C.D. Utah Jan. 11, 2018).

## CONCLUSION

For the reasons explained above, Plaintiffs do not object to the Special Master's proposed redistricting plan (Special Master Plan 2) and urge this Court to adopt it, request that District 1 be assigned to one of the soon-to-be open seats (A or B) on the 32nd JDC, and determine an appropriate implementation schedule for that plan that results in an election for remedial District 1 in 2020.

Respectfully submitted this 29th day of May, 2019.

/s/ Ronald L. Wilson

Ronald L. Wilson (LSBN 13575)  
701 Poydras Street, Ste. 4100  
New Orleans, LA 70139  
T: (504) 525-4361 / F: (504) 525-4380  
cabral2@aol.com

Michael de Leeuw\*, Cozen O'Connor  
William Lesser\*  
45 Broadway, 16th Floor  
New York, NY 10006  
T: (212) 908-1131 / F: (646) 461-2042  
MdeLeeuw@cozen.com

/s/ Leah C. Aden

Leah C. Aden\*, \*\*, NAACP LDF  
40 Rector Street, 5th Floor  
New York, NY 10006  
T: (212) 965-2200 / F: (212) 226-7592  
laden@naacpldf.org

Michaele N. Turnage Young\*, NAACP LDF  
700 14th Street NW, Suite 600  
Washington, D.C. 20005  
T: (202) 216-5567 / F: (202) 682-1312  
mturnageyoung@naacpldf.org

\*PRO HAC VICE / \*\*TRIAL ATTORNEY

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing *Plaintiffs' Corrected Memorandum Regarding Special Master's Report and Recommended Remedy (Doc. 396)* with this Court using the CM/ECF system, which provides notice of filing to all counsel of record.

Dated: May 29, 2019

/s/ Leah C. Aden  
LEAH C. ADEN  
NAACP LEGAL DEFENSE  
AND EDUCATIONAL FUND, INC.  
40 Rector Street, 5th Floor  
New York, NY 10006  
(212) 965-2200  
(212) 229-7592 (fax)