UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INCLUSIVE LOUISIANA; MOUNT TRIUMPH BAPTIST CHURCH; RISE ST. JAMES, by and through their members *Plaintiffs*, vs. ST. JAMES PARISH; ST. JAMES PARISH COUNCIL; ST. JAMES PARISH PLANNING COMMISSION, *Defendants.*	Civil Action No. 2:23-cv-00987 Section J Judge Carl Barbier Magistrate Judge Janis van Meerveld

PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES

NOW INTO COURT, through undersigned counsel come Plaintiffs Inclusive Louisiana, Mount Triumph Baptist Church, and RISE St. James (collectively, "Plaintiffs") and respectfully move this Court, pursuant to Federal Rules of Civil Procedure 7(b) and 37(a), for an order compelling Defendants ("Defendants" or the "Parish") to fully respond to Plaintiffs' Request for Production No. 65, served on May 11, 2026, seeking "all documents and communications related to the decision to re-district Districts 3 and 4 in the Parish's 2020 Re-Districting Plan."

As set forth more fully in the accompanying Memorandum in Support of this Motion, the requested materials are within the scope of discovery under Rule 26 because they are relevant to Plaintiffs' claims and the Parish's defenses and proportional to the case. Whether, and to what extent, the Parish considered demographic composition and population trends in drawing or redrawing council district lines relates directly to Plaintiffs' allegations that Defendants have a pattern and practice of burdening the majority-Black populations in the 4th and 5th Districts with industrial harms while shielding majority-white areas of the Parish, and on whether any

redistricting has been used, or would operate, to dilute the political power of any of these populations. The Parish's non-specific objections improperly withhold information potentially necessary for Plaintiffs to support their claims and defend against the Parish's defenses. The request asks only for a discrete universe of material, and the Parish has not substantiated its argument of burden. The Parties held a meet and confer but could not reach an agreement about this request.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant this Motion and enter an order: (a) compelling Defendants to fully respond, without objection, to Plaintiffs' Request for Production No. 65 within 30 days of the signing of the order; (b) awarding Plaintiffs their reasonable expenses, including attorneys' fees, incurred in making this Motion pursuant to Federal Rule of Civil Procedure 37(a)(5); and (c) granting such other and further relief as the Court deems just and proper.

Respectfully submitted this 29th day of September, 2026,

/s/ Clara Potter
Clara Potter, La. Bar Roll No. 38377
Devin Lowell, La. Bar Roll No. 36555
Lisa Jordan, La. Bar No. 20451
ENVIRONMENTAL LAW CLINIC
TULANE LAW SCHOOL
6329 Freret St.
New Orleans, LA 70118
Tel.: (504) 865-5789
Fax: (504) 862-8721
cpotter2@tulane.edu
dlowell@tulane.edu
lwjordan@tulane.edu

Attorneys for RISE St. James

/s/ Hailey Green
Hailey Green, Student Attorney
hgreen8@tulane.edu

/s/ Forge Mathes
Forge Mathes, Student Attorney
fmathes@tulane.edu

Student Attorneys for RISE St. James

/s/ Pamela C. Spees
Pamela C. Spees, La. Bar Roll No. 29679
Astha Sharma Pokharel*
Baher Azmy*
Kayla Vinson*
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel. & Fax (212) 614-6462
asharmapokharel@ccrjustice.org
pspees@ccrjustice.org
bazmy@ccrjustice.org
kvinson@ccrjustice.org

** Admitted pro hac vice*

William P. Quigley (cooperating counsel)
La. Bar Roll No. 7769
Professor Emeritus
Loyola University College of Law
7214 St. Charles Avenue
New Orleans, LA 70118
Tel. (504) 710-3074
Fax (504) 861-5440
quigley77@gmail.com

Attorneys for Plaintiffs Inclusive Louisiana and Mount Triumph Baptist Church

CERTIFICATION OF GOOD-FAITH CONFERRAL

Pursuant to Federal Rule of Civil Procedure 37(a)(1) and Magistrate Judge van Meerveld's Order regarding Fed. R. Civ. P. 37(a)(1), undersigned counsel certifies that counsel for Plaintiffs scheduled a conference via their July 31, 2026, deficiency letter and subsequent email correspondence with counsel for Defendants about deficiencies with the Parish's Response to Plaintiffs' First Set of Discovery Requests. The Parties conferred by telephone on August 13, 2026, and again on August 18, 2026, for purposes of resolving the issues raised in that letter. Present at those conferences were counsel for Plaintiffs Astha Sharma-Pokharel, Pamela Spees, Kayla Vinson, Devin Lowell, and Clara Potter, as well as counsel for Defendants, Danielle Borel and John King. Each conference lasted approximately one hour. The topics that were addressed at the conference included all deficiencies that the Plaintiffs identified with the Parish's Response to Plaintiffs' First Set of Discovery Requests, including deficiencies with responses to Interrogatories Nos. 1, 2, and 4, RFPs No. 1-4, 6-10, 33, 38, 47, 50, and 53-58; the Parish's General Objections Nos. 5 and 9; the Parish's responses to Interrogatories Nos. 5, 6, 7, and 8; its responses to Interrogatory No. 9 and RFP No. 50; its responses to RFPs No 5, 8, 9, 10, 11, 22, 23, 33, 28, 47, 56; and finally, the currently-contested RFP No. 65. Through the meet and confer and subsequent correspondence between the Parties, all other issues have been resolved. Specifically, the Parties agreed to narrowing terms on some of the requests and the Parish agreed to search for responsive documents prior to 2014, among other agreements. The only remaining issue for resolution is the Parish's response to RFP No. 65. The Parties could not come to an agreement about the relevancy and proportionality of this request. These details of these exchanges and the Parties' agreements are memorialized in the exhibits attached to the Memorandum in Support of this Motion.

CERTIFICATE OF SERVICE

I hereby certify that on September 29, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Clara Potter