

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

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| <p>INCLUSIVE LOUISIANA; MOUNT TRIUMPH BAPTIST CHURCH; RISE ST. JAMES, by and through their members</p> <p><i>Plaintiffs,</i></p> <p>vs.</p> <p>ST. JAMES PARISH; ST. JAMES PARISH COUNCIL; ST. JAMES PARISH PLANNING COMMISSION,</p> <p><i>Defendants.</i></p> | <p>Civil Action No. 2:23-cv-00987 Section D/1 Judge Carl J. Barbier Magistrate Judge Janis van Meerveld</p> |
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PLAINTIFFS' MOTION FOR LEAVE TO SUPPLEMENT COMPLAINT

NOW INTO COURT, through undersigned counsel, come Plaintiffs, who respectfully submit this Motion for Leave to Supplement Complaint pursuant to Federal Rule of Civil Procedure 15(d). The proposed Second Amended Complaint includes new allegations concerning events that have occurred, or information obtained, since the filing of the First Amended Complaint and that further demonstrate St. James Parish's unlawful and racially discriminatory practice of steering harmful industry into majority-Black parts of the Parish, impacting Plaintiffs' health, property, environment, as well as historic, cultural, and religious sites, including cemeteries, and contributing to stigmatic harm.

Defendant St. James Parish opposes this motion.

WHEREFORE, Plaintiffs respectfully pray that this Court grant it leave to file a Second Amended Complaint.

Date: July 1, 2025

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Respectfully submitted,

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***Application for admission forthcoming*

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