

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF LOUISIANA

JAMILA JOHNSON, *et al.*

Plaintiffs,

v.

KYLE ARDOIN, IN HIS OFFICIAL
CAPACITY AS LOUISIANA SECRETARY
OF STATE,

Defendant.

Case No.: 3:18-cv-00625-SDD-EWD

DEFENDANT SECRETARY OF STATE'S
MOTION FOR CERTIFICATION OF ORDER FOR INTERLOCUTORY APPEAL

Pursuant to Local Rule 7 and 28 U.S.C. § 1292(b), Defendant moves for an interlocutory appeal of this Court's May 9, 2019 Order denying Defendant's Motion to Dismiss. ECF No. 68.

For the reasons set forth in the attached Memorandum of Law in Support, Defendant Secretary of State respectfully requests this Court GRANT this Motion for Interlocutory Appeal and so indicate by amending its May 9th Order. Plaintiffs OBJECT to this motion.

DATED: May 20, 2019

Respectfully Submitted,

/s/Celia R. Cangelosi
Celia R. Cangelosi
Bar Roll No. 12140
5551 Corporate Blvd., Suite 101
Baton Rouge, LA 70808
Telephone: (225) 231-1453
Facsimile: (225) 231-1456
Email: celiacan@bellsouth.net

Jeff Landry
Louisiana Attorney General
/s/ Elizabeth B. Murrill
Elizabeth B. Murrill
Solicitor General
Angelique Duhon Freel
Carey Tom Jones
David Jeddie Smith
Jeffery M. Wale
OFFICE OF THE ATTORNEY GENERAL
LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766

murrille@ag.louisiana.gov
freela@ag.louisiana.gov
walej@ag.louisiana.gov
jonescar@ag.louisiana.gov
smithda@ag.louisiana.gov

Jason Torchinsky (VSB 47481)*
Phillip M. Gordon (TX 24096085)*
HOLTZMAN VOGEL JOSEFIK
TORCHINSKY PLLC
45 N. Hill Drive, Suite 100
Warrenton, VA 20186
Telephone: (540) 341-8808
Facsimile: (540) 341-8809
Email: jtorchinsky@hvjt.law
pgordon@hvjt.law
*admitted *pro hac vice*
Counsel for the Defendant

CERTIFICATE OF SERVICE

I do hereby certify that, on this 20th day of May 2019, the foregoing Motion for Interlocutory Appeal was electronically filed with the Clerk of Court using the CM/ECF system, which gives notice of filing to all counsel of record.

/s/ Angelique Duhon Freel
OFFICE OF THE ATTORNEY GENERAL
LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766
freela@ag.louisiana.gov

Counsel for the Defendant

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**MEMORANDUM IN SUPPORT OF DEFENDANT SECRETARY OF STATE'S
MOTION FOR CERTIFICATION OF INTERLOCUTORY APPEAL**

On May 9, 2019, this Court issued an Order Denying Defendant's Motion to Dismiss ("Order") "for reasons to be assigned." (ECF No. 68). The Court's Order denied, *inter alia*, Defendant's request for dismissal for lack of jurisdiction because Plaintiffs failed to request a three-judge court under 28 U.S.C. § 2284 as well as on the equitable defense of laches. Irrespective of the Court's forthcoming reasons, it is a near certainty that the Court's resolution of the three-judge court and laches issues would benefit from interlocutory review by the United States Court of Appeals for the Fifth Circuit. The only Circuit Court merits panel to have addressed the three-judge court question concluded that a three-judge court was required, *see Page v. Bartels*, 248 F.3d 175, 189 (3rd Cir. 2001), and a recent Fifth Circuit motions panel sharply divided on the question, *Thomas v. Bryant*, 919 F.3d 298, 316 (5th Cir. 2019) (motions panel) (Clement, J. dissenting in part). Therefore, for the reasons set forth herein, Defendant moves for certification of that Order under 28 U.S.C. § 1292(b).

BACKGROUND

A referral to the United States Court of Appeals for the Fifth Circuit is appropriate here. After seven years and four congressional elections, Plaintiffs seek to upend Louisiana’s congressional districting scheme by attempting, but failing, to only plead a violation of the Voting Rights Act (the “Act”). Plaintiffs allege that the Louisiana Legislature *intentionally* “packed” and “cracked” African American voters to dilute their voting strength. An allegation of intentional discrimination by state officials is the very essence of a racial gerrymandering claim under the Fourteenth and Fifteenth Amendments. *See generally Reynolds v. Sims*, 377 U.S. 533 (1964) (Diluting the weight of votes because of place of residence impairs basic constitutional rights under the Fourteenth Amendment”); *United States v. Raines*, 362 U.S. 17, 25 (1960) (“[D]iscrimination by state officials . . . against the voting rights of United States citizens, on the grounds of race or color [is] subject to the ban of [the Fifteenth] Amendment”); *see also Nevett v. Sides*, 571 F.2d 209 (5th Cir. 1978) (allegations of racially motivated state action that dilutes the right to vote states a cause of action under the Fifteenth Amendment). Even if Plaintiffs somehow did not allege a constitutional violation, the history and purpose of the three-judge statute makes clear that *any* case affecting a congressional reapportionment is subject to 28 U.S.C. § 2284. *See Page v. Bartels*, 248 F.3d 175 (3d Cir. 2001); *Thomas*, 919 F.3d at 321-25 (motions panel) (Clement, J. dissenting in part).

Section 2 of the Voting Rights Act prohibits the creation of barriers to voting on the basis of race. *See* 52 U.S.C. § 10101, *et seq.* The Voting Rights Act is, itself, an outgrowth of the Reconstruction Amendments, specifically the Fourteenth and Fifteenth Amendments. *See, e.g., City of Boerne v. Flores*, 521 U.S. 507, 518 (1997) (“We have also concluded that . . . measures protecting voting rights are within Congress’ power to enforce the Fourteenth and Fifteenth

Amendments, despite the burdens those measures placed on the States.”). The Fifteenth Amendment prohibits the denial or abridgment of the right to vote on the basis of race. U.S. Const. art. XV. To that end, racial considerations cannot predominate when a legislature reapportions. *See Miller v. Johnson*, 515 U.S. 900, 916 (1995). The Voting Rights Act is inextricable linked to the Fourteenth and Fifteenth Amendments because the Amendments themselves place a limit on the scope of the Act. As a legal matter, it is impossible to have a Voting Rights Act claim without invoking the U.S. Constitution. As a practical matter, Plaintiffs’ pled a constitutional violation, even if they did not intend to. In either event, a dismissal or referral to the Court of Appeals is required.

As this case arises in equity, so to must a defense in equity be available. The “[d]octrine of laches is based upon the maxim that equity aids the vigilant and not those who slumber on their rights.” *Kansas v. Colorado*, 514 U.S. 673, 687 (1995). Laches is simply the equitable equivalent to a statute of limitations. *See Hair v. United States*, 350 F.3d 1253, 1257 (Fed. Cir. 2003) (“Even without a specific statutory bar to call into play, courts will impose a parallel bar—under the rubric of laches—in cases in which the plaintiff has failed to act in a reasonably prudent manner to protect and enforce rights, and when a perceived injustice to the defendant exists.”). The mere fact that this is a claim arising under the constitution is immaterial because “[a] constitutional claim can become time-barred just as any other claim can.” *See Block v. N.D.*, 461 U.S. 273, 292 (1983). Furthermore, ongoing harms, including harms under the Voting Rights Act, are not precluded from dismissal on the basis of laches. *See, e.g., Fouts v. Harris*, 88 F. Supp. 2d 1351 (S.D. Fla. October 25, 1999) (three-judge court) (dismissing VRA and constitutional claim on the basis of laches); *Maxwell v. Foster*, 1999 U.S. Dist. LEXIS 23447, *10-11, n.2 (W.D. La. Nov. 24, 1999) (three-

judge court) (dismissing, *inter alia*, VRA and Fourteenth Amendment claims on the basis of laches).

ARGUMENT

The Court’s resolution of the parties’ arguments regarding the mandatory provisions of the three-judge statute, 28 U.S.C. § 2284, and the applicability of the affirmative defense of laches to alleged continuing constitutional harms should be certified for interlocutory appeal.¹ This Court may certify an order for interlocutory appeal under 28 U.S.C. § 1292(b) upon finding that “(1) a controlling question of law is involved, (2) there is substantial ground for difference of opinion about the question of law, and (3) immediate appeal will materially advance the ultimate termination of the litigation.” *Rico v. Flores*, 481 F.3d 234, 238 (5th Cir. 2007); *Jackson v. Louisiana Dep’t of Pub. Safety & Corr.*, No. CV 15-490-JJB-RLB, 2016 WL 6136592, at *1 (M.D. La. May 2, 2016). The purpose of 28 U.S.C. § 1294 was to give the judiciary “considerable flexibility” in order to avoid the “disadvantages of . . . final judgment appeals.” *Hadjipateras v. Pacifica, S.A.*, 290 F.2d 697, 703 (5th Cir. 1961). “Under § 1292(b), it is the order, not the question, that is appealable.” *Castellanos-Contreras v. Decatur Hotels LLC*, 622 F.3d 393, 398 (5th Cir. 2010) (citing *Yamaha Motor Corp. v. Calhoun*, 516 U.S. 199, 205 (1996)).

¹ This motion is timely having been filed only 11 days after the Court’s Order. See *Cazorla v. Koch Foods of Mississippi, LLC*, 2015 U.S. Dist. LEXIS 84924, *8 (S.D. Miss. June 30, 2015) (“While the statute provides a time limit for filing § 1292(b) motions in the appeals court, ‘there is no statutory deadline for the filing of the petition in the district court’; the petition need only be filed in a ‘reasonable time.’” (quoting *Ahrenholz v. Bd. of Trs. of the Univ. of Ill.*, 219 F.3d 674, 676 (7th Cir. 2000) (Posner, C.J.)); see also *Aparicio v. Swan Lake*, 643 F.2d 1109, 1112 (5th Cir. 1981).

I. The Order Involves Controlling Questions of Law to Which There Are Substantial Grounds for Difference of Opinion.

The Court’s disposition of Defendant’s motion to dismiss rests on a set of controlling legal questions that are potentially dispositive of the action. “Whether an issue of law is controlling usually ‘hinges upon its potential to have some impact on the course of the litigation.’” *United States v. La. Generating LLC*, 2012 U.S. Dist. LEXIS 142349, *5 (M.D. La. October 1, 2012) (quoting *Tesco v. Weatherford Intern., Inc.*, 722 F. Supp. 2d 755, 766 (S.D. Tex. 2010)). “[I]t is clear that a question of law is controlling if reversal of the order would terminate the action.” *Id.* (internal quotations omitted).

As highlighted by the extensive briefing at the motion to dismiss stage, there is a substantial ground for difference of opinion as to the applicability of the three-judge statute and laches to this case. “A substantial ground for difference of opinion may exist ‘if novel and difficult questions of first impression are presented.’” *June Med. Servs., LLC. v. Gee*, 2018 U.S. Dist. LEXIS 82504, *3-4 (M.D. La. May 11, 2018) (quoting *Mitchell v. Hood*, 2014 U.S. Dist. LEXIS 61377 (E.D. La. May 2, 2014)); *see also La. Generating LLC*, 2012 U.S. Dist. LEXIS 142349, *5 (“[A] genuine doubt as to the correct applicable legal standard relied on in the order” is a substantial ground). This case raises important and novel issues related to the applicability of § 2284 and laches to VRA and constitutional claims. At this stage the Court need not consider whether the Order is correct, it need only recognize that the law in this area is unsettled.

Defendant has maintained that Plaintiffs were required to request a three-judge panel under 28 U.S.C. § 2284, and that the convening of a three-judge district court is jurisdictional. Plaintiffs’ failure to request a three-judge panel necessitates either dismissal or, alternatively, referral to the chief judge of the Fifth Circuit. *See* 28 U.S.C. § 2284(b)(1). Plaintiffs’ Complaint actually alleges a constitutional violation, *see, e.g.*, ECF No. 33-1 at 2-4, and, in any event, the history and

legislative intent of § 2284 was to capture “any case involving congressional reapportionment,” *see Page v. Bartels*, 248 F.3d 175 (3d Cir. 2001). Plaintiffs have argued that a three-judge court is not required because a claim under the VRA is a statutory claim like any other and, therefore, § 2284 does not apply. On the issue of laches, the controlling question of law at issue is the applicability of laches to claims for prospective relief. If laches is applicable to claims of prospective relief then dismissal of this case is appropriate. By denying Defendant’s motion to dismiss, the Court implicitly agreed with Plaintiffs as to laches and § 2284.

Irrespective of the parties’ positions, it is certain that the failure to request and empanel a three-judge court is a controlling question that has the “potential to have some impact on the course of the litigation.” *See La. Generating LLC*, 2012 U.S. Dist. LEXIS 142349 at *5. The impact goes to the Court’s jurisdiction. *See Stratton v. St. Louis S. R. Co.*, 282 U.S. 10, 16 (1930); *see also . LULAC v. Texas*, 318 Fed. Appx. 261, 264 (2009) (per curiam) (“We agree with our sister circuits that the term ‘shall’ in § 2284 is mandatory and jurisdictional.”). If a three-judge court ought to have been impaneled, then a single-judge lacks the power to issue judgment. *See Stratton*, 282 U.S. at 16; *see also Igartua v. Obama*, 842 F.3d 149, 152 (1st Cir. 2016); *see also Armour v. Ohio*, 925 F.2d 987, 989 (6th Cir. 1991). As the applicability of § 2284 is jurisdictional and foundational to the Court’s authority to rule, it is certainly a controlling question worthy of interlocutory review.

Similarly, laches operates as a time bar for claims in much the same way as a statute of limitations. *See Hair*, 350 F.3d at 1257. Should laches be found applicable to bar prospective relief for VRA and constitutional claims, then a motion to dismiss is appropriate and would effectively end the litigation. *See Fouts*, 88 F. Supp. 2d at 1353-55. As such, interlocutory review is appropriate.

II. An Immediate Appeal Will Materially Advance the Ultimate Termination of the Litigation.

Resolution of the three-judge court and laches issues will materially advance the litigation. “There is no requirement that permitting an interlocutory appeal be certain to materially advance the termination of the litigation; rather, 28 U.S.C. § 1292(b) only requires that permitting such an appeal *may* materially advance the ultimate termination of the litigation.” *Scott v. Ruston Louisiana Hosp. Co.*, 2017 U.S. Dist. LEXIS 56138, *15 (W.D. La. April 12, 2017) (internal quotation omitted) (emphasis in original). Avoiding post-trial appeals on a topic is sufficient to satisfy the “materially advance the ultimate termination” threshold. *See Cazorla v. Koch Foods of Miss., LLC.*, 838 F.3d 540, 548 (5th Cir. 2016). Furthermore, “a key consideration of whether the appeal may advance the ultimate termination of the litigation is if the appeal has the potential to speed up the litigation.” *June Med. Servs., LLC.*, 2018 U.S. Dist. LEXIS 82504 at *4.

If, after final judgment, the Fifth Circuit determines that a three-judge court ought to have been convened or that laches does in fact bar claims for prospective relief, the case will either be dismissed or be re-litigated from its inception. *See e.g., Armour*, 925 F.2d at 989 (reversing district court and remanding with instructions to convene a three-judge panel). The result would be an extraordinary waste of judicial and party resources. In fact, the parties risk mootng the litigation by waiting until after final judgment for the Fifth Circuit to rule on the applicability of § 2284. *See Thomas v. Bryant*, 919 F.3d 298, 316 (5th Cir. 2019) (motions panel) (Clement, J. dissenting in part).² As noted, interlocutory review of the Order may make any further action in this Court either

² *Thomas v. Bryant* only serves to highlight the substantial grounds for difference of opinion that exists as to § 2284 and laches as applied to Voting Rights Act claims. Over the sharp dissent of Judge Clement, the motions panel in *Thomas* found that § 2284 and laches did not apply. However, Judge Clement was adamant that a majority of the Fifth Circuit would likely see these issues differently than the motions panel majority. *See Thomas*, 919 F.3d at 325. Furthermore, *Thomas* is not dispositive here as “[a] motions panel decision is not binding precedent.” *Northshore Dev.*,

futile or unnecessary. *See Mitchell v. Hood*, 2014 U.S. Dist. LEXIS 61377, *18 (E.D. La. May 2, 2014) (avoiding costly and burden of litigation by potential dismissal materially advances the litigation). Therefore, resolution of the Order as it pertains to the laches and three-judge issues will materially advance the ultimate termination of this litigation.

III. The Court Should Stay this Case Pending Appeal.

Section 1292(b) allows a stay of proceedings if the “district judge . . . shall order.” *See* 28 U.S.C. § 1292(b). The stay factors considered in § 1292(b) appeals is the same as in any other stay pending appeal. *See Ministry of Oil of the Republic of Iraq v. 1,032,212 Barrels of Crude Oil*, 2015 U.S. Dist. LEXIS 22980, *11-12 (S.D. Tex. February 26, 2015). The stay factors are as follows: (1) whether the applicant is likely to succeed on the merits; (2) whether the applicant will be irreparably injured; (3) whether the plaintiffs will be substantially injured; and (4) the public interest. *Id.* at *11. All factors support a stay in this case.

Given the jurisdictional and dispositive nature of the questions to be presented on interlocutory appeal, this case should be stayed pending the outcome of that appeal. It is in the interest of all parties to settle this interlocutory dispute now to avoid lengthy and expensive litigation that has every possibility of being relitigated when a three-judge court is empaneled. The parties and the public interest will be furthered by the correct application of the law in this matter. Should the Circuit Court find that the three-judge statute applies, then any actions by this Court would have been in vain or, at the very least, would have to be reviewed by the newly appointed

Inc. v. Lee, 835 F.2d 580, 583 (5th Cir. 1988). And, on the issue of the three-judge panel, the *Thomas* motions panel addressed issues that are related but distinguishable from those at issue here. *See, e.g.*, ECF No. 63 at 2-3. The *Thomas* merits panel granted appellant’s motion to expedite and is set to hear oral argument on June 11, 2019. *Thomas, et al. v. Bryant, et al.*, No. 19-60133. Both laches and the three-judge court jurisdictional question are presented in that appeal. *See* Appellant’s Brief, *Thomas, et al. v. Bryant, et al.*, No. 19-60133 (5th Cir. April 18, 2019).

judges. Such an outcome would result in significant confusion under the best of circumstances. Should the Fifth Circuit find that laches is applicable, the result ought to be dismissal of Plaintiffs' claims, which would negate all subsequent actions in this Court. In either event, a stay is appropriate to conserve judicial and party resources in the event any of the issues raised in the motion to dismiss are reversed.

CONCLUSION

Plaintiffs should not be rewarded for their years long delay in bringing suit that threatens to reshape the Louisiana electoral process shortly before the constitutional mandated reapportionment in 2020. An interlocutory appeal will settle the hotly disputed issues undergirding the Court's jurisdiction and Defendant's laches affirmative defense. The Court should certify this question to the Fifth Circuit by amending its May 9, 2019 Order. Therefore, for the aforementioned reasons, this Court should certify interlocutory appeal to the United States Court of Appeals for the Fifth Circuit pursuant to 28 U.S.C. § 1292(b).

Dated: May 20, 2019

/s/Celia R. Cangelosi
Celia R. Cangelosi
Bar Roll No. 12140
5551 Corporate Blvd., Suite 101
Baton Rouge, LA 70808
Telephone: (225) 231-1453
Facsimile: (225) 231-1456
Email: celiacan@bellsouth.net

Respectfully Submitted,

Jeff Landry
Louisiana Attorney General
/s/ Elizabeth B. Murrill
Elizabeth B. Murrill
Solicitor General
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Jeffery M. Wale
OFFICE OF THE ATTORNEY GENERAL
LOUISIANA DEPARTMENT OF JUSTICE
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Baton Rouge, LA 70804
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murrille@ag.louisiana.gov
freela@ag.louisiana.gov

walej@ag.louisiana.gov
jonescar@ag.louisiana.gov
smithda@ag.louisiana.gov

Jason Torchinsky (VSB 47481)*
Phillip M. Gordon (TX 24096085)*
HOLTZMAN VOGEL JOSEFIK
TORCHINSKY PLLC
45 N. Hill Drive, Suite 100
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Telephone: (540) 341-8808
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Baton Rouge, LA 70804
(225) 326-6766
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MOTION FOR CERTIFICATION OF ORDER FOR INTERLOCUTORY APPEAL

Before the Court is Defendant's Motion for Certification of Order for Interlocutory Appeal and Stay Pending Appeal. After considering the motion, the Court is of the opinion it should be GRANTED.

IT IS THEREFORE ORDERED that Defendant's Motion for Certification of Order for Interlocutory Appeal and Stay Pending Appeal is hereby GRANTED. The Court's order of May 9, 2019 (ECF No. 68), will be amended, pursuant to 28 U.S.C. § 1292(b) and Federal Rule of Appellate Procedure 5(a)(3) to state that the question regarding the applicability of 28 U.S.C. § 2284(b) and the affirmative defense of laches to Plaintiffs' claims, presents a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the order may materially advance the ultimate termination of this litigation.

DATE:_____

UNITED STATES DISTRICT JUDGE
Shelly D. Dick

Respectfully Submitted,

/s/Celia R. Cangelosi
Celia R. Cangelosi
Bar Roll No. 12140
5551 Corporate Blvd., Suite 101
Baton Rouge, LA 70808
Telephone: (225) 231-1453
Facsimile: (225) 231-1456
Email: celiacan@bellsouth.net

Jeff Landry
Louisiana Attorney General
/s/ Elizabeth B. Murrill
Elizabeth B. Murrill
Solicitor General
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OFFICE OF THE ATTORNEY GENERAL
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1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766
murrille@ag.louisiana.gov
freela@ag.louisiana.gov
walej@ag.louisiana.gov
jonescar@ag.louisiana.gov
smithda@ag.louisiana.gov

Jason Torchinsky (VSB 47481)*
Phillip M. Gordon (TX 24096085)*
HOLTZMAN VOGEL JOSEFIK
TORCHINSKY PLLC
45 N. Hill Drive, Suite 100
Warrenton, VA 20186
Telephone: (540) 341-8808
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/s/ Angelique Duhon Freel
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LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766
freela@ag.louisiana.gov

Counsel for the Defendant