

In the Supreme Court of the United States

STATE OF LOUISIANA,

Appellant,

v.

PHILLIP CALLAIS, ET AL.,

Appellees.

PRESS ROBINSON, ET AL.,

Appellants,

v.

PHILLIP CALLAIS, ET AL.,

Appellees.

**ROBINSON APPELLANTS'
APPLICATION TO EXCEED WORD LIMIT**

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RULE 29.6 DISCLOSURE STATEMENT

The Louisiana State Conference of the NAACP is a non-profit membership organization. There are no parents, subsidiaries or affiliates of the Louisiana State Conference of the NAACP that have issued shares or debt securities to the public.

Power Coalition for Equity and Justice is a non-profit coalition of community organizations. There are no parents, subsidiaries or affiliates of the Power Coalition for Equity and Justice that have issued shares or debt securities to the public.

APPLICATION

Pursuant to Rules 22 and 33.1(d), Appellants in No. 24-110, Press Robinson, Edgar Cage, Dorothy Nairne, Edwin René Soulé, Alice Washington, Clee Earnest Lowe, Martha Davis, Ambrose Sims, Davante Lewis, NAACP Louisiana State Conference, and Power Coalition for Equity and Justice (collectively, the “*Robinson* Appellants”) respectfully request leave to file a supplemental reply brief in excess of the word limit, up to a total of 12,000 words. Appellant the State of Louisiana takes no position, and the Louisiana Secretary of State consents to the application. Appellees oppose the application.

In support of the application, *Robinson* Appellants state:

1. On August 1, 2025, the Court ordered the parties to file supplemental briefs concerning: “Whether the State’s intentional creation of a second majority-minority congressional district violates the Fourteenth or Fifteenth Amendments to the U. S. Constitution.” The Court required Appellants to file their briefs by August 27. Appellees’ brief was due by September 17.

2. In the Court’s Order for supplemental briefing, Appellants’ briefs were not to exceed 13,000 words and were due by August 27. Appellees’ brief was due by September 17 and was likewise not to exceed 13,000 words.

3. On August 27, the State of Louisiana filed its Supplemental Brief. Although it sought reversal of the district court’s decision in its original briefing, Louisiana’s Supplemental Brief seeks affirmance. In that brief, Louisiana argued, for the first time in this litigation, that Section 2 of the Voting Rights Act is

unconstitutional as applied to redistricting, and that Section 2 therefore did not justify the State's creation of S.B. 8. That same day, *Robinson* Appellants filed a brief defending the constitutionality of Section 2 and arguing that it offers a compelling interest sufficient to justify narrowly tailored remedial plans and continuing to seek reversal of the decision below.

4. On September 17, Appellees filed a Supplemental Brief elaborating on their argument, raised for the first time in their merits brief on appeal, that Section 2 is unconstitutional. That same day, the Secretary of State also filed a Supplemental Brief that, like the State's brief, argued for the first time that Section 2 and S.B. 8 are unconstitutional. *Robinson* Appellants have moved to strike the Secretary's brief.

5. *Robinson* Appellants reasonably anticipate that Louisiana will file a reply brief up to 6,000 words by October 3 that will likely seek to both rebut *Robinson* Appellants arguments and defend the position, shared by Appellees and the Secretary, that Section 2 is unconstitutional.

6. In total, Louisiana, the Secretary, and Appellees will have filed no fewer than four supplemental briefs totaling up to 45,000 words in support of the position that Section 2 of the Voting Rights Act is unconstitutional. Even if the *Robinson* Appellants' motion to strike is granted, Louisiana and Appellees will have had up to 32,000 words to support their position. Notably, even if this application is granted, *Robinson* Appellants would still have filed fewer briefs (two) and had far fewer total words (up to 25,000 in total) to defend the constitutionality of the seminal Voting Rights Act.

7. Although this application will not make up for the absence of any determination on the constitutional issue by the district court or the absence of any relevant evidence or factual findings, granting it will provide the Court with a fuller presentation of the issues under these unusual circumstances.

Accordingly, *Robinson* Appellants request that the Court grant their application to exceed word limits for their supplement reply brief.

Respectfully submitted,

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