

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

DO NO HARM, a nonprofit corporation  
incorporated in the State of Virginia,

Plaintiff,

v.

JOHN BEL EDWARDS, in his official  
capacity as Governor of Louisiana,

Defendant.

No. 5:24-cv-00016-JE-MLH

**Judge Edwards  
Magistrate Judge Hornsby**

**RULE 26(f) CASE MANAGEMENT REPORT**

A meeting of counsel (and any unrepresented parties) was held on March 26, 2024, by telephone. The following persons participated:

Plaintiff Do No Harm through counsel Laura D’Agostino (Trial Attorney) and Caleb Trotter;

Defendant Jeff Landry, in his official capacity as Governor of Louisiana, through counsel Carey T. Jones.

1. Nature of Plaintiff’s Claim:

**Discrimination on the basis of race**

2. Bench or Jury Trial:

**Bench trial**

2. Initial Disclosures:

**Plaintiff served its initial disclosures on March 29, 2024.  
Defendant expects to serve his initial disclosures by April 4, 2024.**

4. Jurisdiction:

**No party challenges the Court’s subject matter jurisdiction over  
this case.**

5. Joinder of Parties and Amendment of Pleadings:

A. Does any party anticipate seeking leave to amend a pleading or add a party?

**No party anticipates amending a pleading or adding a party.**

B. If so, describe briefly the anticipated amendments and identify any potential new parties and the nature of the claim against them.

**N/A**

C. State a proposed deadline for all amendments. If any party requests a deadline that is more than 30 days after the date of the scheduling conference, provide a detailed explanation.

**May 10, 2024.**

6. Discovery Issues:

A. Each party shall briefly describe (i) any discovery disputes the party anticipates may arise and (ii) any relief the party requests from the court in connection with the discovery issues.

**Given the parties' general agreement as to the expected plan for discovery, no discovery disputes are anticipated.**

B. State a proposed deadline for completion of all discovery. If any party requests a deadline that is more than 5 months after the date of the scheduling conference, provide a detailed explanation.

**August 1, 2024.**

7. Motion Practice:

A. Identify all pending motions.

**N/A**

B. Does either party anticipate filing a case dispositive motion? If so, (i) identify the proposed motion and (ii) state a proposed deadline for dispositive motions.

**The parties anticipate filing cross-motions for summary judgment. The proposed deadline for both parties' motions is September 16, 2024.**

8. Alternative Dispute Resolution:

**Given that this case raises a facial constitutional challenge to a statute, the parties agree that the case is not amenable to ADR.**

9. Related Cases:

**N/A**

10. Trial by Magistrate Judge:

**The parties do not consent to trial by magistrate judge.**

DATED: April 3, 2024

Respectfully submitted,

/s/ Carey T. Jones

Carey T. Jones (#07474)  
Assistant Attorney General  
Louisiana Dept. of Justice  
P.O. Box 94005  
Baton Rouge, LA 70802  
Telephone: (225) 326-6000  
Facsimile: (225) 326-6098  
JonesCar@ag.louisiana.gov

*Attorney for Defendant*

/s/ James S. C. Baehr

James S. C. Baehr  
La. Bar No. 35431  
*Local Counsel*  
BAEHR LAW  
609 Metairie Rd, #8162  
Metairie, LA 70005  
Telephone: (504) 475-8407  
Fax: (504) 828-3297  
james@baehr.law

/s/ Caleb R. Trotter

CALEB R. TROTTER  
Cal. Bar No. 305195\*  
PACIFIC LEGAL FOUNDATION  
555 Capitol Mall, Suite 1290  
Sacramento, CA 95814  
Telephone: (916) 419-7111  
Fax: (916) 419-7747  
CTrotter@pacificlegal.org

Laura M. D'Agostino

Va. Bar No. 91556\*

*Trial Attorney*

PACIFIC LEGAL FOUNDATION  
3100 Clarendon Boulevard, Suite 1000  
Arlington, VA 22201  
Telephone: (202) 888-6881  
Fax: (916) 419-7747  
LDAgostino@pacificlegal.org

*Attorneys for Plaintiff Do No Harm*

*\*pro hac vice*

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2024, I presented the foregoing document to the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to the following:

Carey T. Jones  
Assistant Attorney General  
Louisiana Dept. of Justice  
P.O. Box 94005  
Baton Rouge, LA 70802  
JonesCar@ag.louisiana.gov  
*Counsel for Defendant*

*/s/ Caleb R. Trotter*  
CALEB R. TROTTER