

Subject: RE: RE: RE: Public Records Request (LA-GOV-24-0070)
Date: Thursday, March 28, 2024 at 5:57:44 PM Eastern Daylight Time
From: Gov PublicRecords
To: Khahilia Shaw, AO Records
Attachments: image001.png, EDWARDS v. LANDRY 651814 19TH JDC.pdf

EXTERNAL SENDER

Ms. Shaw,

Our office has completed our search and review of records in response to your public records request, below. Our office has identified one public record responsive to your request. That record is attached to this email. Please note we have made the following determinations regarding exceptions, exemptions, and privileges and not produced certain records for the following reasons:

- 4 records have been withheld pursuant to executive privilege, the deliberative process privilege, and La. R.S. 44:5.
- 2 records have been withheld pursuant to executive privilege, the deliberative process privilege, lawyer-client privilege pursuant to La. C.E. 506, attorney work product pursuant to La. R.S. 44:4.1(C), and La. R.S. 44:5.

Thank you.

Jeffrey Wale

From: Gov PublicRecords <GovPublicRecords@la.gov>
Sent: Thursday, March 7, 2024 4:16 PM
To: Khahilia Shaw <khahilia.shaw@americanoversight.org>
Subject: RE: RE: RE: Public Records Request (LA-GOV-24-0070)

Ms. Shaw,

Thank you for the clarification. Our office will proceed with the search pursuant to the parameters set forth in your email below. Our office will begin determining what, if any, records are subject to your request, as well as any whether any exceptions or exemptions apply. Please note that pursuant to La. R.S. 44.1 et seq., and particularly La. R.S. 44:5, certain records may not be disclosed. You will be notified within twenty-one (21) days of this email whether we have located any records responsive to your request, and what, if any, privileges may apply.

Thank you.

Jeffrey Wale

From: Khahilia Shaw <khahilia.shaw@americanoversight.org>
Sent: Thursday, March 7, 2024 12:24 PM
To: Gov PublicRecords <GovPublicRecords@la.gov>
Subject: Re: RE: RE: Public Records Request (LA-GOV-24-0070)

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Mr. Wale,

Thank you for clarifying and apologies for the confusion. Regarding Item xx. of Request 4, please do search the specified custodians' inboxes and outboxes for records containing both (a) the domain name ("ag.louisiana.gov") and (b) each of the key terms listed in Item 3.

Please let me know of any additional questions.

Thank you,

Khahilia Shaw | (she/her)
Counsel | American Oversight
khahilia.shaw@americanoversight.org | 202.539.6507
www.americanoversight.org | @weareoversight

From: Gov PublicRecords <GovPublicRecords@la.gov>
Date: Wednesday, March 6, 2024 at 4:46 PM
To: Khahilia Shaw <khahilia.shaw@americanoversight.org>
Subject: RE: RE: Public Records Request (LA-GOV-24-0070)

EXTERNAL SENDER

Ms. Shaw,

I wanted to confirm that our office did conduct our search for all items except Item #4(xx), "Anyone communicating from an email address ending in ag.louisiana.gov." My response to you below encompasses our search with that exception. Is it possible to narrow your search for Item #4(xx) to certain keywords, such as the keywords listed in Part 3?

Thank you.

Jeffrey Wale

From: Khahilia Shaw <khahilia.shaw@americanoversight.org>
Sent: Tuesday, March 5, 2024 1:37 PM
To: Gov PublicRecords <GovPublicRecords@la.gov>; AO Records <records@americanoversight.org>
Subject: Re: RE: Public Records Request (LA-GOV-24-0070)

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Mr. Wale,

Thank you for your message. In an effort to narrow the scope of Item 4 of this request, we propose that your office search the inboxes and outboxes of the officials listed in Part 3, using the domain names provided in Item 4 as search terms.

So, for example, search Governor Landry's inbox and outbox for the terms "adflegal.org", "aflegal.org", "acped.org" and the other listed domain names. Then repeat the searches for the provided domain names for Kyle Ruckert, Andree, Miller, etc.

Please let me know if you have any additional questions.

Best,

Khahilia Shaw | (she/her)
Counsel | American Oversight
khahilia.shaw@americanoversight.org | 202.539.6507
www.americanoversight.org | @weareoversight

From: Gov PublicRecords <GovPublicRecords@la.gov>
Date: Wednesday, February 28, 2024 at 12:21 PM
To: AO Records <records@americanoversight.org>
Subject: RE: Public Records Request (LA-GOV-24-0070)

EXTERNAL SENDER

Dear Ms. Shaw and Ms. Mayanja,

Our office has completed our search and review of records with respect to your request Items #1, #2, #3, and #4's Sections i-xix. Our office has no public records responsive to your request. Please note we have made the following determinations regarding exceptions, exemptions, and privileges and not produced certain records for the following reasons:

1. 3 records have been withheld due to executive privilege, the deliberative process privilege, and La. R.S. 44:5.

With respect to your request in Item #4(xx), we find that request overly broad and burdensome and ask that you clarify or narrow your request, in accordance with my previous emails to you on February 5 and February 7. Please let me know if you would like to narrow or clarify your request, and I will wait for your response before proceeding.

Thank you.

Jeffrey Wale

From: Gov PublicRecords <GovPublicRecords@la.gov>
Sent: Wednesday, February 7, 2024 4:41 PM
To: AO Records <records@americanoversight.org>
Subject: RE: Public Records Request (LA-GOV-24-0070)

Dear Ms. Shaw and Ms. Mayanja,

With respect to Items #1, #2, and #3, our office will begin determining what, if any, records are subject to your request, as well as any whether any exceptions or exemptions apply. Please note that pursuant to La. R.S. 44.1 et seq., and particularly La. R.S. 44:5, certain records may not be disclosed. You will be notified within twenty-one (21) days of this email whether we have located any records responsive to your request, and what, if any, privileges may apply.

With respect to Item #4, we will await your response to my previous email before commencing our search for records.

Thank you.



Jeffrey Wale

Deputy Executive Counsel
Office of Governor Jeff Landry
Phone: (225) 342-7015
www.Louisiana.gov

From: Gov PublicRecords <GovPublicRecords@la.gov>
Sent: Monday, February 5, 2024 9:53 AM
To: AO Records <records@americanoversight.org>
Subject: RE: Public Records Request (LA-GOV-24-0070)

Dear Ms. Shaw and Ms. Mayanja,

Our office has received your public records request, attached to the email below. Due to the broad nature of your request, I ask that you please narrow or clarify your request so that we may adequately respond further. In particular, our office finds Request #4 overly broad, in particular section xix, “anyone communicating from an email address ending in lsbme.la.gov” and section xx, “anyone communicating from an email address ending in ag.louisiana.gov.” If you could narrow or clarify that the email communications you seek in Request #4 are limited to emails containing the “key terms” from Request #3, or perhaps other key terms, that would assist our office in responding to your request.

Thank you.



Jeffrey Wale

Deputy Executive Counsel
Office of Governor Jeff Landry
Phone: (225) 342-7015
www.Louisiana.gov

From: AO Records <records@americanoversight.org>
Sent: Thursday, February 1, 2024 12:57 PM
To: Gov PublicRecords <GovPublicRecords@la.gov>
Subject: Public Records Request (LA-GOV-24-0070)

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Public Records Officer,

Please find attached a request for records under Louisiana's Public Records Law.

Sincerely,

Eva Mayanja | (she/hers)

Paralegal | American Oversight

records@americanoversight.org

www.americanoversight.org | @weareoversight

Public Records Request: LA-GOV-24-0070

SEC. 26

JOHN BEL EDWARDS, in His
Official Capacity as Governor
of the State of Louisiana

DOCKET NO. 651814, Div. _____

SECTION NO. _____

versus

19th JUDICIAL DISTRICT COURT

JEFF LANDRY, in His Official
Capacity as Attorney General
of the State of Louisiana

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

STATE

SEP 30 2016

BY JP
DEPUTY CLERK OF COURT

FILED: _____

DEPUTY CLERK

PETITION FOR WRIT OF MANDAMUS

The Petition of JOHN BEL EDWARDS, in his official capacity as Governor of the State of Louisiana, whose office is in the Parish of East Baton Rouge, respectfully represents:

1.

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2016 SEP 30 PM 1:45
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Made defendant herein is JEFF LANDRY, in his official capacity as Attorney General of the State of Louisiana.

2.

Petitioner, as the Governor of the State of Louisiana, is "the chief executive officer of the state," and he is charged by the Constitution with "see[ing] that the laws of the state are faithfully executed." La. Const. article IV, § 5(A). In that capacity and to that end, Petitioner has directed and continues to direct various executive agencies and departments of the State to enforce and faithfully execute the laws of the State.

3.

Defendant is the executive head and chief administrative officer of the Department of Justice and "the chief legal officer of the state." La. Const. article IV, § 8; La. R.S. 36:701(B). The Department of Justice is domiciled in Baton Rouge, and it has the power to sue and be sued. La. R.S. 36:701(A). By virtue of

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CIVIL DIVISION

LA-GOV-24-0070-A-000001 THE ATTORNEY GENERAL

his office, the Defendant is charged with “the assertion or protection of any right or interest of the state.” *Id.* He is, however, as the head of a Department within the executive branch, subject to the policy decisions of the head of that branch, i.e., the Governor. And as the State’s lawyer, he is ethically required by the Rules of Professional Conduct promulgated by the Louisiana Supreme Court to “abide by [his] client’s decisions concerning the objectives of representation” and to “consult with [his] client as to the means by which they are to be pursued.” La. S. Ct. Rules, R.P.C. 1.2(a). His *ex officio* representation of the State “does not constitute an endorsement of [his] client’s political, religious, economic, social or moral views or activities.” *Id.*, 1.2(b).

4.

Notwithstanding the grant of representation authority to the Attorney General, Louisiana constitutional law has long recognized the power of the Legislature to authorize, whether explicitly or implicitly, members of the executive branch to retain private counsel other than the Attorney General to advise and represent them in their faithful enforcement and execution of the laws of the State. See, e.g., *Ricks v. Department of State Civil Service*, 200 La. 341, 374, 8 So.2d 49, 60 (1942) (“the framers of the Constitution never intended [La. Const. article VII, § 56 (1921), which empowered the Attorney General to ‘attend to, and have charge of all legal matters in which the State has an interest’] to operate as a limitation upon the Legislature to prohibit it from passing any act, calling for the employment of counsel where it deemed such was necessary”); *Saint v. Allen*, 172 La. 350, 364, 134 So. 246, 250 (1931) (“[t]he commission has the implied power to employ counsel ... arising out of the power to sue and be sued”).

5.

Pursuant to this authority, the Legislature has enacted statutes governing the retention of private counsel by entities within the executive branch and setting forth the procedures for such employment of private counsel, specifically La. R.S. 42:262 and La. R.S. 49:258.

6.

La. R.S. 42:262 is primarily concerned with the method of compensation of private counsel retained by the attorney general or any state agency, board or commission, exclusive of public postsecondary education institutions, bond counsel, and generally, counsel retained to defend the State in tort actions. The statute prohibits contingency fee contracts [§ 262(A)], provides that attorney fee awards are the property of the State [§262(B)], prohibits payment of any private counsel by a third party [§ 262(C)], and requires the keeping of records of hours and expenses and sets a maximum hourly fee [§ 262(D)]. Subsection F provides additional conditions for the retention of a so-called “special attorney or counsel,” providing in Subsection F(1):

In the event it should be necessary to protect the public interest, for any state board or commission to retain or employ any special attorney or counsel to represent it in any special matter for which services any compensation is to be paid, the board or commission may retain or employ such special attorney or counsel solely on written approval of the governor and the attorney general and pay only such compensation as the governor and the attorney general may designate or approve in the written approval. The approval shall be given in their discretion upon the application of the board or commission.

Read alone, this statute would appear to grant the attorney general (along with the governor) discretion in approving the retention of special attorneys or counsel by state boards and commissions, and the statute is silent as to the retention of such counsel by other executive agencies that are not boards or commissions.

7.

But La. R.S. 42:262 cannot be read alone; by its own terms, La. R.S. 49:258 supersedes La. R.S. 42:262:

Notwithstanding the provisions of any other law to the contrary and specifically the provisions of any law that authorizes the state or a state agency to appoint, employ, or contract for private legal counsel to represent the state or a state agency, including but not limited to the provisions of R.S. 42:261, 262, and 263, and R.S. 40:1299.39(E), any appointment of private legal counsel to represent the state or a state agency shall be made by the attorney general with the concurrence of the commissioner of administration in accordance with the following procedure:

(Emphasis added.) The statute then sets forth a procedure whereby appointments are to be made according to a written procedure, with the governor, attorney general, and commissioner of administration together establishing both the procedure and the minimum qualifications for the private attorneys, with both the procedure and the qualifications to be published “at least annually in the Louisiana Bar Journal or such other publication as will reasonably ensure dissemination to the membership of the Louisiana State Bar Association.” La. R.S. 49:258(1).

8.

La. R.S. 49:258 thus, by its terms, supersedes the discretion set forth with respect to boards and commissions in La. R.S. 42:262(F)(1), and replaces it with a ministerial process for approval of private counsel, by both the Division of Administration and the Attorney General, and appointment by the Attorney General. Defendant has at least partially complied with the provisions of La. R.S. 49:258 by publishing the minimum qualifications in the Louisiana Bar Journal, most recently at 64 La. Bar J. 176 (August-September 2016), a copy of which is attached hereto as Exhibit A. (It should be noted, however, that despite the statutory requirements, neither the Governor nor the Commissioner of Administration participated in the development of the purported “conditions” set

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forth therein.) Defendant, through his Chief Deputy Attorney General, has also acknowledged via memorandum that his ministerial function in the appointment of private counsel is limited to the review of the appointed counsel's qualifications and fee arrangements, see Exhibit B.

9.

Notwithstanding his statutory ministerial duty and his acknowledgment of it, Defendant has refused to perform the ministerial task of approving private counsel contracts and appointing private counsel for numerous executive agencies of the State.

10.

Some, but not all, of the private counsel contracts that have been approved by the Division of Administration, but Defendant has refused to approve, are:

- A. A contract between the Department of State and Shows, Cali & Walsh, L.L.P., dated August 1, 2016;
- B. Contracts between the Department of Insurance and Kantrow, Spaht, Weaver & Blitzer, APLC, dated June 7, 2016; and Young, Richaud & Myers, dated June 8, 2016;
- C. A contract between the Louisiana State Bond Commission and Jones Walker, L.L.P., dated August 3, 2016;
- D. Contracts between Offices of the Division of Administration and Frilot, L.L.C., effective August 1, 2016; Kantrow, Spaht, Weaver & Blitzer (A Professional Law Corporation), dated August 8, 2016; and Decuir, Clark & Adams, LLP, dated September 1, 2016;
- E. Contracts between the Department of Economic Development with the Law Offices of Joseph Looney, effective July 10, 2016; and King, Krebs & Jurgens, P.L.L.C., effective August 1, 2016;

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- F. A contract between the Department of Natural Resources and Oats & Marino, APPC, dated July 7, 2016;
- G. An amendment to a pre-existing contract between the Department of Public Safety & Corrections and Patrick Jackson, APLC, dated June 2, 2016;
- H. A contract between the Department of Transportation and Development and Theodore "Ted" L. Jones, effective March 1, 2016;
- I. A contract between the Military Department and Taylor, Porter, Brooks & Phillips L.L.P., dated August 9, 2016;
- J. A contract between the Louisiana Workforce Commission and Cravins Trosclair A PLC, dated August 8, 2016;
- K. A contract between the Coastal Protection and Restoration Authority and Dunlap & Fiore, LLC, dated July 22, 2016;
- L. A contract between the Board of Pharmacy and Celia R. Cangelosi, Attorney at Law, dated August 3, 2016;
- M. Contracts between the Office of Elderly Affairs and the Advocacy Center, dated July 1, 2016; and Jane A. Thomas, dated July 1, 2016;
- N. Contract between Southeastern Louisiana University and Seale and Ross dated May 5, 2016;
- O. Contract between the Louisiana State Licensing Board for Contractors and Bankston and Associates, L.L.C. effective August 1, 2016; and
- P. Eleven contracts between various firms and the Patients Compensation Fund.

11.

The Commissioner of Administration has approved all of these contracts. All of the lawyers and law firms who are parties to the contracts meet, and generally far exceed, the minimum qualifications set forth by Defendant. None of

the fee arrangements set forth in the contract violate La. R.S. 42:262 in any way. Yet Defendant has refused to perform his ministerial duty of approving the contracts and appointing these attorneys.

12.

Defendant has explicitly most of rejected the contracts on the grounds that the contracting attorneys should not have agreed not to discriminate in employment and the rendering of services in accordance with Executive Order No. JBE 2016-11.

13.

As an example, the Attorney General has rejected a contract between the State Bond Commission and the two law firms retained as bond counsel for the issuance of general obligation bonds for the State of Louisiana. In so doing, the Attorney General supplied the following reasoning:

The contracts you submitted to retain outside counsel are being returned to you without approval from our office. The Attorney General requires antidiscrimination clauses in legal contracts to be written in conformity with State and Federal law; therefore, these provisions should not contain language exceeding what the law requires. Additionally, On May 14, 2016, the Attorney General issued an opinion regarding the Governor's Executive Order JBE 16-11, which can be found on our website.

This explanation does not provide any further description of the state or federal laws to which the Attorney General is referring.

14.

Notwithstanding the provisions of R.P.C. 1.2(b), Defendant apparently believes that it is necessary that private attorneys who contract with entities within the executive branch must retain the right to discriminate against persons on the basis of sexual orientation and gender identity, and that state departments, agencies, boards, and commissions cannot comply with Executive Order No. JBE 2016-11.

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15.

Defendant's ongoing refusal to perform his ministerial duty of approving private counsel contracts and appointing the attorneys is causing ever-increasing disruption of the ability of the executive branch to perform the tasks of governing the State.

16.

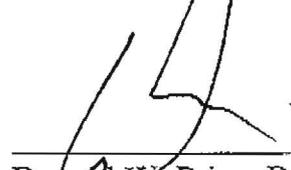
Accordingly, Governor Edwards petitions the Court for the immediate issuance of an alternative writ of mandamus to Defendant, Attorney General Jeff Landry, setting a rule to show cause why the writ of mandamus should not be made peremptory, in accordance with L. C.C.P. article 3782. The writ should compel Defendant to perform his statutory ministerial duty to give written approval of the choice of counsel of the executive branch entities and to appoint said

WHEREFORE, Plaintiff, John Bel Edwards, in his official capacity as Governor of the State of Louisiana, prays that an alternative writ of mandamus issue, stating that the role of Defendant, Jeff Landry, in his official capacity as Attorney General, in approving private counsel contracts is ministerial in nature and limited to a review of private counsel's qualifications and fees; and directing Defendant to approve the pending private counsel contracts for executive branch entities and to appoint said counsel, or alternatively to show cause at a date and time to be set by the Court why this alternative writ should not be made peremptory; that this Petition and said alternative writ be served upon Defendant, Jeff Landry, at 1885 N. Third Street, Baton Rouge, LA 70802; and that all costs of these proceedings be taxed to defendant.

Respectfully submitted,



Matthew F. Block, Bar Roll No. 25577
Executive Counsel
Office of the Governor
900 North Third Street, Fourth Floor
Baton Rouge, Louisiana 70802



Donald W. Price, Bar Roll No. 19452
Special Counsel
P.O. Box 94396
617 North Third Street, 12th Floor
Baton Rouge, Louisiana 70804-9396

Attorneys for Plaintiff
GOVERNOR JOHN BEL EDWARDS

PLEASE SERVE:

Jeff Landry
Attorney General, State of Louisiana
1885 North Third Street
Baton Rouge, LA 70802

Minimum Qualifications, Conditions for Appointment as Special Assistant Attorney General

The minimum qualifications and conditions for appointment as a Special Assistant Attorney General are listed below.

1. The attorney shall be admitted to practice law in the state of Louisiana unless the action is pending in another state, in which event the attorney shall be admitted to practice in the state where the action is pending.
2. If the action is pending before a federal court or other court of special admission requirements, the attorney shall be admitted to practice before such court.
3. The attorney shall not be under suspension by the Louisiana Supreme Court or any court in which the action is pending.
4. The attorney and any attorney with whom he is engaged in the practice of law shall not represent any plaintiff in any tort claim against the state and/or its departments, commissions, boards, agencies, officers, officials or employees unless specifically waived in writing by the Attorney General and the Office of Risk Management.
5. The attorney shall not have a conflict of interest as provided by the Rules of Professional Conduct of the Louisiana State Bar Association.
6. The attorney shall have and maintain professional malpractice insurance with minimum coverage of \$1 million per claim with an aggregate of \$1 million.
7. The attorney must be a subscriber to an electronic billing program designated by the Office of Risk Management.

8. The attorney should have a Martindale-Hubbell rating of "bv" or better.

9. The attorney should have been admitted to and engaged in the practice of law for a minimum of three years.

10. The requirements set forth in 8 and 9 may be waived by the Attorney General, in which event the attorney will be placed in a probationary status for a period of three years. During the period of probation, the attorney's performance will be evaluated annually by the State Risk Administrator-Claims and the Assistant Director for Litigation Management of the Office of Risk Management and the Director of the Litigation Program of the Louisiana Department of Justice.

In the event that the attorney's performance is acceptable during the three-year probationary period, he shall be removed from probationary status. In the event the attorney's performance is unsatisfactory, he may be removed from the probationary list or, at the discretion of the State Risk Administrator-Claims, the Assistant Director for Litigation Management of the Office of Risk Management and the Director of the Litigation Program of the Louisiana Department of Justice, the probationary period may be extended.

Additional Requirements for the Defense of Medical Malpractice Claims

11. The attorney should have three years' experience in the defense of medical malpractice claims.
12. The attorney should have participated as counsel of record in at least two medical malpractice trials.
13. Professional malpractice limits shall be at least \$1 million per claim with an aggregate of \$1 million.
14. Requirements 11 and 12 may be waived by the Attorney General, in which event the attorney will be placed on probation as to medical malpractice defense as provided in paragraph 10 above.

Conditions

1. Any attorney appointed by the Attorney General serves at the pleasure of the Attorney General and may be removed by the Attorney General at any time without cause.
2. Office of Risk Management may withdraw its concurrence of any attorney only for cause.
3. All contracts must comply with the Ethical Standards for Public Servants, Title 42, Section 15, Part II of the Louisiana Revised Statutes, including, but not limited to, La. R.S. 42:1113.

176 August / September 2016

EBR3817837

EXHIBIT A



Jeff Landry
Attorney General

State of Louisiana
DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
P.O. BOX 94005
BATON ROUGE
70804-9005

MEMORANDUM

TO: All Agency Heads, Department Undersecretaries, Business Managers,
Board and Commissions

FROM: Bill Stiles
Chief Deputy Attorney General

DATE: August 9, 2016

RE: Professional Legal Contracts Review Procedure

In accordance with R.S. 49:258, the appointment of private legal counsel to represent the State shall be made by the Attorney General with concurrence of the Commissioner of Administration. Effective immediately, the Office of the Attorney General will be reviewing all Professional Legal Contracts for attorney qualifications and fee arrangements only. All other provisions of the contract will be approved by the Office of State Procurement pursuant to R.S. 39:1595.1

If you have any questions, please contact Lauren Barbalich at 225-326-6000 or barbalichl@ag.louisiana.gov.

EXHIBIT B

JOHN BEL EDWARDS, in His
Official Capacity as Governor
of the State of Louisiana

DOCKET NO. _____, DIV. ____

SECTION NO. _____

versus

19th JUDICIAL DISTRICT COURT

JEFF LANDRY, in His Official
Capacity as Attorney General
of the State of Louisiana

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

FILED: _____

DEPUTY CLERK

ORDER

Considering the Petition for Writ of Mandamus,

IT IS ORDERED that:

1. Certified copies of the Petition and of this Order be served on defendant, Jeff Landry, in his official capacity as Attorney General of the State of Louisiana, at 1885 North Third Street, Baton Rouge, LA 70802;
2. An alternative writ of mandamus issue, stating that the role of Defendant, Jeff Landry, in his official capacity as Attorney General, in approving private counsel contracts is ministerial in nature and limited to a review of private counsel's qualifications and fees; and directing Defendant either to approve the contracts and appoint the counsel as cited in the Petition, or to show cause to the contrary on the ____ day of _____, 2016, at ____ o'clock, ____m.; and
3. Defendant, Jeff Landry, in his official capacity as Attorney General of the State of Louisiana, show cause on the same date and hour why the

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alternative writ of mandamus now ordered to be issued should not be made
peremptory, at his costs.

Baton Rouge, Louisiana, this ____ day of _____, 2016.

JUDGE, 19TH JUDICIAL DISTRICT COURT

PLEASE SERVE:

Jeff Landry
Attorney General, State of Louisiana
1885 North Third Street
Baton Rouge, LA 70802