

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

RONALD CHISOM, et al.,	∞	CIVIL ACTION NO.: 86-4075
Plaintiffs,	∞	
	∞	
UNITED STATES OF AMERICA,	∞	
Plaintiff-Intervenor,	∞	
	∞	
BERNETTE J. JOHNSON,	∞	SECTION E
Plaintiff-Intervenor	∞	JUDGE SUSIE MORGAN
	∞	
Versus	∞	
	∞	
PIYUSH (“BOBBY”) JINDAL, et al.,	∞	
Defendants	∞	MAGISTRATE SALLY SHUSHAN

**PLAINTIFF-INTERVENOR BERNETTE JOHNSON and PLAINTIFFS’  
MARIE BOOKMAN, RONALD CHISOM, AND MARC MORIAL’S  
MOTION TO STAY PROCEEDINGS**

NOW COMES Plaintiff-Intervenor Bernette Joshua Johnson (hereinafter “Justice Johnson”) and Plaintiffs Ronald Chisom, Marie Bookman, and Marc Morial requesting this Court stay any actions by the Louisiana Supreme Court in furtherance of its June 13, 2012 Order, in the matter entitled *In re: Office of Chief Justice, Louisiana Supreme Court*, No. 12-O-1342 (hereinafter “the June 13, 2012 Order”).

On August 21, 1992, and then again on January 3, 2000, all the parties in this action entered into a binding Consent Judgment, which judgment governs many significant terms

of Justice Johnson's tenure on the Louisiana Supreme Court. On July 5, 2012, Justice Johnson was forced to request relief from this Court, through a Motion (1) to Reopen Case, (2) to Join as Defendants Justice Kimball, Victory, Knoll, Weimer, Guidry, and Clark, of the Louisiana Supreme Court; and (3) for Contempt Against Justices Kimball, Weimer, Guidry, and Clark ("Motion to Reopen Case"). As contemplated by the June 13, 2012 Order, the Louisiana Supreme Court and a newly configured panel of Justices will proceed in a manner contrary to this Court's binding Consent Judgment, arbitrarily and improperly usurping this U.S. District Court's sole jurisdiction to resolve any real or imagined issues arising from the Consent Judgment, as amended.

On July 6, 2012, Justice Johnson requested expedited consideration of her Motion to Reopen Case, and asked that this Court hear the Motion to Reopen Case before its August 1, 2012 regularly scheduled civil-motions hearing date. This Motion to Stay Proceedings is a companion motion to the Motion to Reopen Case, specifically now requesting the Court prohibit the Louisiana Supreme Court and Justices Kimball, Weimer, Guidry, and Clark, from proceeding with the matter entitled *In re: Office of Chief Justice, Louisiana Supreme Court*, No. 12-O-1342 dated June 13, 2012 (hereinafter "the June 13, 2012 Order"), until such time as this Court has ruled on Plaintiff-Intervenor's and Plaintiffs'<sup>1</sup> Motion to Reopen Case.

WHEREFORE, Plaintiff-Intervenor and Plaintiffs pray that this Honorable Court issue an order to stay all proceedings planned and contemplated by the Louisiana Supreme Court in furtherance of its June 13, 2012 Order in *In re: Office of Chief Justice, Louisiana Supreme*

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<sup>1</sup> On Tuesday, July 10, 2012, Plaintiffs Marie Bookman, Ronald Chisom, and Marc Morial filed a separate Motion to Reopen Case, joining Justice Johnson in her request for relief from this Court.

*Court*, No. 12-O-1342 until such time as this Court has ruled on the motions filed by Plaintiff-Intervenor and Plaintiffs, now pending before this Court.

Dated: July 18, 2012.

Respectfully submitted:

s/James M. Williams

JAMES M. WILLIAMS, BAR NO. 26141 (T.A.)  
ALANAH O. HEBERT, BAR NO. 31904  
EVAN WILLIAMS, BAR NO. 34153  
INEMESIT U. O'BOYLE, BAR NO. 30007  
**GAUTHIER, HOUGHTALING & WILLIAMS, LLP**  
3500 N. Hullen Street  
Metairie, Louisiana 70002  
504-456-8600 (o)  
504-456-8624 (f)

CLARENCE ROBY, JR. BAR NO. 20345  
**LAW OFFICE OF CLARENCE ROBY, JR.**  
3701 Canal Street, Floor 4, Suite U  
New Orleans, Louisiana 70119  
504-486-7700 (o)  
504-486-8005 (f)

TRACIE WASHINGTON, BAR NO. 25925  
**LOUISIANA JUSTICE INSTITUTE**  
1631 Elysian Fields Avenue  
New Orleans, Louisiana 70117  
T: 504.872.9134  
F: 504.872.9878  
[tlwesq@cox.net](mailto:tlwesq@cox.net)  
[tracie@LouisianaJusticeInstitute.org](http://tracie@LouisianaJusticeInstitute.org)

JON GREENBAUM, DCBN 489887  
MEREDITH HORTON, DCBN 976787  
**LAWYERS' COMMITTEE FOR CIVIL RIGHTS  
UNDER LAW**

1401 New York Avenue, NW  
Suite 400  
Washington, DC 20005  
202-662-8315 (o)  
202-628-2858 (f)  
[jgreenbaum@lawyerscommittee.org](mailto:jgreenbaum@lawyerscommittee.org)  
[mhorton@lawyerscommittee.org](mailto:mhorton@lawyerscommittee.org)

**ATTORNEYS FOR PLAINTIFF-INTERVENOR**

-- AND --

WILLIAM P. QUIGLEY, LSBN 7769 (T.A.)  
DAVIDA FINGER, LSBN 30889  
**LOYOLA UNIVERSITY NEW ORLEANS COLLEGE  
OF LAW**

7214 St. Charles Avenue, Campus Box 902  
New Orleans, Louisiana 70118  
504-861-5591 (o)  
504-861-5440 (f)  
[Quigley77@gmail.com](mailto:Quigley77@gmail.com)  
[dfinger@loyno.edu](mailto:dfinger@loyno.edu)

RONALD L. WILSON, LSBN 13575  
701 Poydras Street  
Suite 400  
New Orleans, Louisiana 70139  
504-525-4361 (o)  
504-525-4361 (f)  
[cabral2@aol.com](mailto:cabral2@aol.com)

**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading has been sent via U.S. Mail postage prepaid to Chief Justice Catherine Kimball, Justice Jeffrey Victory, Justice Jeannette Knoll, Justice John Weimer, Justice Greg Guidry and Justice Marcus Clark at 410 Royal Street, New Orleans, Louisiana 70130; Governor Piyush(“Bobby”) Jindal at 900 N. 3<sup>rd</sup> Street, Baton Rouge, Louisiana 70802;; and all others via this Honorable Court’s CM/ECF notification system, this 18<sup>th</sup> day of July, 2012.

s/James M. Williams

JAMES M. WILLIAMS