

IN THE SUPREME COURT OF OHIO

THE OHIO ORGANIZING COLLABORATIVE, <i>et al.</i> ,	:	Case No. 2021-1210
	:	
	:	
<i>Petitioners,</i>	:	APPORTIONMENT CASE
	:	
v.	:	Filed pursuant to S.Ct.Prac.R. 14.03(A)
	:	and Section 9 of Article XI of the Ohio
OHIO REDISTRICTING COMMISSION, <i>et al.</i> ,	:	Constitution to challenge a plan of
	:	apportionment promulgated pursuant to
	:	Article XI.
<i>Respondents.</i>	:	
	:	

**PETITIONERS’ MOTION FOR AN ORDER DIRECTING RESPONDENTS TO
SHOW CAUSE WHY THEY SHOULD NOT BE HELD IN CONTEMPT**

Alicia L. Bannon (PHV 25409-2022)
Yurij Rudensky (PHV 25422-2022)
Harry Black (PHV 25544-2022)
BRENNAN CENTER FOR JUSTICE
AT NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
Tel: (646) 292-8310
Fax: (212) 463-7308
alicia.bannon@nyu.edu

Brian A. Sutherland (PHV 25406-2022)
REED SMITH LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
Tel: (415) 543-8700
Fax: (415) 391-8269
bsutherland@reedsmith.com

Peter M. Ellis (0070264)
Counsel of Record
M. Patrick Yingling (PHV 10145-2022)
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606
Tel: (312) 207-1000
Fax: (312) 207-6400
pellis@reedsmith.com

*Attorneys for Petitioners
The Ohio Organizing Collaborative, et al.*

(listing of counsel for petitioners continued on next page)

Ben R. Fliegel (PHV 25411-2022)
REED SMITH LLP
355 South Grand Avenue, Suite 2900
Los Angeles, CA 90071
Tel: (213) 457-8000
Fax: (213) 457-8080
bfliegel@reedsmith.com

Brad A. Funari (PHV 3139-2022)
Danielle L. Stewart (0084086)
Reed Smith Centre
REED SMITH LLP
225 Fifth Avenue
Pittsburgh, PA 15222
Tel: (412) 288-4583
Fax: (412) 288-3063
bfunari@reedsmith.com
dstewart@reedsmith.com

*Attorneys for Petitioners
The Ohio Organizing Collaborative, et al.*

(counsel for respondents listed on next page)

Counsel for Respondents

W. Stuart Dornette (0002955)
Beth A. Bryan (0082076)
Philip D. Williamson (0097174)
TAFT STETTINIUS & HOLLISTER LLP
425 Walnut St., Suite 1800
Cincinnati, Ohio 45202-3957
Tel: (513) 381-2838
Fax: (513) 381-0205
dornette@taftlaw.com
bryan@taftlaw.com
pwilliamson@taftlaw.com

Phillip J. Strach (PHV 25444-2021)
Thomas A. Farr (PHV 25461-2021)
John E. Branch, III (PHV 25460-2021)
Alyssa M. Riggins (PHV 25441-2021)
Greg McGuire (PHV 25483)
NELSON MULLINS RILEY &
SCARBOROUGH LLP
4140 Parklake Ave., Suite 200
Raleigh, North Carolina 27612
Tel: (919) 329-3812
Fax: (919) 329-3799
phil.strach@nelsonmullins.com
tom.farr@nelsonmullins.com
john.branch@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
greg.mcguire@nelsonmullins.com

Counsel for Respondents
Senate President Matt Huffman and
House Speaker Robert Cupp

Senator Vernon Sykes, *pro se*
Sd28@ohiosenate.gov

Minority Leader Allison Russo, *pro se*
Allison.Russo@ohiohouse.gov
Rep24@ohiohouse.gov

Erik J. Clark (0078732)
Counsel of Record
Ashley Merino (0096853)
ORGAN LAW LLP
1330 Dublin Road
Columbus, Ohio 43215
T: (614) 481-0900
F: (614) 481-0904
ejclark@organlegal.com
amerino@organlegal.com

Counsel for Respondent
Ohio Redistricting Commission

OHIO ATTORNEY GENERAL
Bridget C. Coontz (0072919)
Counsel of Record
Julie M. Pfeiffer (0069762)
Michael A. Walton (0092201)
Assistant Attorneys General
Michael J. Hendershot (0081842)
Deputy Solicitor
30 E. Broad Street, 16th Floor
Columbus, OH 43215
Tel: (614) 466-2872
Fax: (614) 728-7592
bridget.coontz@ohioago.gov
julie.pfeiffer@ohioago.gov
michael.walton@ohioago.gov
michael.hendershot@ohioago.gov

Counsel for Respondents
Governor Mike DeWine,
Secretary of State Frank LaRose, and
Auditor Keith Faber

Counsel for *Amici Curiae*

Subodh Chandra (0069233)
Donald Screen (0044070)
Counsel of Record
THE CHANDRA LAW FIRM LLC
The Chandra Law Building
1265 West 6th Street
Cleveland, Ohio 44113
Tel: (216) 578-1700
subodh.chandra@chandrafirm.com
donald.screen@chandrafirm.com

Janette McCarthy Wallace (0066257)
Anthony P. Ashton*
Anna Kathryn Barnes*
NAACP
Office of the General Counsel
4805 Mount Hope Drive
Baltimore, MD 21215
Tel.: (410) 580-5777
jlouard@naacpnet.org
aashton@naacpnet.org
abarnes@naacpnet.org

Jon Greenbaum*
Ezra D. Rosenberg*
Pooja Chaudhuri*
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street, N.W., Ste. 900
Washington, D.C. 20005
Tel.: (202) 662-8600
jgreenbaum@lawyerscommittee.org
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org

*Not Admitted to the State Bar of Ohio

*Counsel for Amicus Curiae The Ohio
State Conference of the NAACP*

Stephanie Marie Chmiel (0087555)
Mary Elizabeth Csarny (0097682)
THOMPSON HINE LLP
41 S. High Street, Suite 1700
Columbus, OH 43215
Tel.: (614) 469-3247
Fax: (614) 469-3361
stephanie.chmiel@thompsonhine.com
mary.csarny@thompsonhine.com

Counsel for Amicus Curiae David Niven

Andrew William Garth (0088905)
City Solicitor
Emily Smart Woerner (0089349)
Deputy City Solicitor
Shannon Doyle Price (0100744)
Assistant City Solicitor
CITY OF CINCINNATI
801 Plum Street, Room 214
Cincinnati, Ohio 45202
Tel.: (513) 352-3307
Fax: (513) 352-1515
emily.woerner@cincinnati-oh.gov
shannon.price@cincinnati-oh.gov

*Counsel for Amicus Curiae City of
Cincinnati*

Donald C. Brey (0021965)
Ryan C. Spitzer (0093515)
ISAAC WILES & BURKHOLDER, LLC
Two Miranova Place, Suite 700
Columbus, Ohio 43215-5098
Tel.: (614) 221-2121
Facsimile: 614-365-9516
dbrey@isaacwiles.com

Counsel for Amicus Curiae Renew Ohio

**MOTION FOR AN ORDER DIRECTING RESPONDENTS TO SHOW CAUSE WHY
THEY SHOULD NOT BE HELD IN CONTEMPT**

This Court ordered the Ohio Redistricting Commission to reconvene and draft and adopt an entirely new General Assembly district plan that conforms with the Ohio Constitution, including Article XI, Sections 6(A) and 6(B), by February 17, 2022. The Commission undisputedly has not complied with the Court’s order. Instead, it has filed a “notice of impasse,” stating that “a majority of the Commission has not been able to adopt a new plan.” The notice of impasse is nothing less than a shocking attempt to nullify this Court’s orders, dispense with Article XI, and move the redistricting process into federal court for “impasse litigation” under federal law.¹ That is not what Ohio voters demanded nor what this Court ordered. This Court should order the Commission, and all of its members, to show cause why they should not be held in contempt of court, with appropriate remedies to follow.

An order to show cause is appropriate here. Not only did the Commission not comply with the Court’s orders, it did not even attempt to do so. The Commission did not even meet until the date that the maps were due to be filed with the Secretary of State. It apparently refused to draw maps as a Commission, and instead only considered a plan that Senator Sykes and Leader Russo proposed, albeit without any input from any other commissioners. Senate President

¹ On February 18, 2022, eight plaintiffs filed suit in federal court against the Commission and the Ohio Secretary of State. *See Gonidakis et al v. Ohio Redistricting Commission et al.*, No. 2:22-cv-773-ALM-EPD (S.D. Ohio). The complaint asks the federal court to declare that the current state legislative districts in Ohio (or lack thereof) violate the U.S. Constitution. The complaint further asks the federal court to adopt the Second Plan previously adopted by the Redistricting Commission for the 2022 election cycle—that is, *the plan that this Court invalidated*. The circumstances of this case strongly suggest that the Commissioners knew, or reasonably should have anticipated, that if they purported to declare an “impasse,” federal litigation would immediately follow.

Huffman and Auditor Faber stated that the proposed plan did not comply with the Ohio Constitution. These objections appear to be meritless, and they are completely unexplained. Nor did the Commission seek to adopt or adapt the map produced by Professor Rodden, or any of the other maps submitted to the Commission. In any event, this Court ordered the Commission to adopt a map, so if any commissioner believed that the proposed plan had defects, then they should have worked with the other commissioners to improve the plan, so that the Commission could enact a constitutional plan. Instead, Senate President Huffman, Speaker Cupp, Auditor Faber, Secretary LaRose, and Governor DeWine chose impasse and defiance of the rule of law. Nothing in the record shows that they lifted a finger to try to comply with the Court's order. Making after-the-fact statements about how any one of them would have preferred to enact a plan, or criticizing the plan proposed by Senator Sykes and Leader Russo, does not change that basic fact.

At this point, and sadly, good faith on the Commission's part cannot be assumed. This Court should order the Commission and each of the individual commissioners to show, with sworn affidavits, what each of them did to comply with the Court's orders to draft and adopt a new plan and why they did not adopt a new plan as ordered by this Court. If the Commission and individual commissioners cannot show that they attempted to comply with this Court's orders *and* show that it was impossible to do so, then this Court should hold the Commission and/or individual commissioners in contempt of court, with remedies to follow based on the parties' respective showings.

For these reasons and those stated below, petitioners respectfully ask this Court to order the Commission, and all of its members, to show cause by 9:00 am on February 22, 2022, as to

why they should not be held in contempt of court, with appropriate remedies to follow.

Petitioners request the opportunity to respond three days later, by 9:00 am on February 25, 2022.

RESPONDENTS' ACTIONS WARRANT AN ORDER DIRECTING THE COMMISSIONERS TO SHOW WHY THEY SHOULD NOT BE HELD IN CONTEMPT

This Court has inherent contempt power, and Respondents undisputedly violated this Court's order—thus warranting this Court to order Respondents to show why they should not be held in civil contempt. “[C]ourts have inherent authority—authority that has existed since the very beginning of the common law—to compel obedience of their lawfully issued orders.” *Cramer v. Petrie*, 70 Ohio St.3d 131, 133, 637 N.E.2d 882 (1994). More than a century ago, this Court explained, “Such [contempt] powers, from both their nature and their ancient exercise, must be regarded as inherent. They do not depend upon express constitutional grant, nor in any sense upon the legislative will. * * * Without such power no other [power] could be exercised.” *Hale v. State*, 55 Ohio St. 210, 213, 45 N.E. 199 (1896); *City of Cleveland v. Bright*, 2020-Ohio-5180, 162 N.E.3d 153, ¶ 17 (8th Dist.) (same).

“Fundamentally, the law of contempt is intended to uphold and ensure the effective administration of justice. Of equal importance is the need to secure the dignity of the court and to affirm the supremacy of law.” *Cramer* at 133. “If courts are to be maintained and if they are to function properly in carrying out their constitutional and statutory duties, the defiance of court authority * * * cannot be tolerated. Courts must vigorously protect the dignity of their judgments, orders, and process. All those who would by misconduct obstruct the administration of justice must be on notice that they do so at their peril.” *Hale* at 89-90; *Bright* at ¶ 18 (same).

Although the General Assembly has codified this Court’s inherent contempt power, *see, e.g.*, ORC 2705.01–.05, “[t]hese statutes are merely cumulative to a court’s inherent contempt power, and they do not in any way abridge that inherent power.” *Bright* at ¶ 35; *Hale* at 215 (“A power which the legislature does not give, it cannot take away. If power, distinguished from jurisdiction, exists independently of legislation, it will continue to exist notwithstanding legislation.”). In particular, Ohio courts “are not bound by the sanction limits set forth in R.C. 2705.05 when imposing a penalty for contempt.” *Bright* at ¶ 45; *City of Cleveland v. Bryce Peters Fin. Corp.*, 8th Dist. Cuyahoga No. 98006, 2013-Ohio-3613, ¶ 48 (“R.C. 2705.05(A) prescribes sanctions for contempt violations, but courts are not required to follow it.”).

Respondents unquestionably violated this Court’s order and all available evidence shows that they did not even attempt to comply with it—thus making an order to show cause appropriate. “[M]ost courts distinguish between civil and criminal contempt proceedings.” *Corn v. Russo*, 90 Ohio St. 3d 551, 554, 740 N.E.2d 265 (2001). Civil contempt is warranted when clear and convincing evidence shows: “(1) a prior order of the court, (2) proper notice to the alleged contemnor, and (3) a failure to abide by the court order.” *Judd v. Meszaros*, 10th Dist. Franklin, No. 10AP-1189, 2011-Ohio-4983, ¶ 41; *State ex rel. Doner v. Zehring*, 134 Ohio St. 3d 326, 2012-Ohio-5637, 982 N.E.2d 664, ¶ 3 (applying “clear and convincing evidence” standard for civil contempt). “[P]roof of *intent* is not required in *civil* contempt.” *Windham Bank v. Tomaszczyk*, 27 Ohio St. 2d 55, 58, 271 N.E.2d 815 (1971) (emphasis in original). “An act does not cease to be a violation of a law and of a decree merely because it may have been done innocently.” *Id.* (quoting *McComb v. Jacksonville Paper Co.*, 336 U.S. 187, 191, 69 S.Ct. 497, 93 L.Ed. 599 (1949)).

Here, it is unfortunately obvious that respondents did not even attempt to comply with this Court’s February 7 order. The Commission had ten days to adopt a constitutional plan, but it did not even meet until 1:30 pm on the day of the deadline. *See Ohio Redistricting Commission, Previous Commission Meetings.*² During that ten-day period, the Commission did not seek out independent mapmakers—despite this Court’s emphasis that using partisan mapmakers is not what the Constitution envisions. *See* January 12, 2022 Opinion ¶ 119; February 7, 2022 Opinion ¶ 34. The majority of the Commission also did not provide early comments on the plan submitted by Senator Sykes and Leader Russo—despite this Court’s repeated emphasis that the Commissioners should work collaboratively, in good faith, to produce a plan. *See* February 7, 2022 Opinion ¶¶ 44, 48.

Instead, the majority of the Commission chose an “impasse.” Impasse, however, was not an option under this Court’s February 7 order. Governor DeWine acknowledged as much after the hearing, stating, “We have an obligation under law to give them a third map. I think it is a mistake for this commission to stop and to basically say that we’re at an impasse. I don’t think that that is an option that the law gives us.”³ Jarrod Clay, *Facing deadline, Ohio Redistricting Commission fails to draft new House, Senate maps* Dayton Now (Feb. 17, 2022). The Commission was not blind to this fact. Governor DeWine acknowledged it during the hearing as well, stating:

² <https://redistricting.ohio.gov/meetings> (accessed on Feb. 18, 2022).

³ <https://bit.ly/3IhtBPD> (accessed Feb. 18, 2022)

If we leave here without getting a map, we are giving the Court absolutely nothing to react to. No one said this is easy, but I believe that we can—giving the mapmakers specific instructions—we can come up with a map that fits better the Constitution as well as the Court Order. I think that’s our obligation. We have an obligation to follow the Constitution. We have an obligation to follow the Court Order. And, and, we have an obligation to produce a map.

Feb. 17, 2022 Ohio Redistricting Comm’n Hrg, Part 2, at 24:42–25:33 (Gov. DeWine).⁴

Less than 15 minutes later, however, in the afternoon of February 17, the Commission’s Co-Chair, House Speaker Cupp, declared an “impasse” without passing any maps. Feb. 17, 2022 Ohio Redistricting Comm’n Hrg, Part 2, at 36:41–36:47.⁵ To be clear, the majority of the Commission did not buckle down over the remaining hours of the day and commit to do what they could to comply with this Court’s order. Instead, in stunning fashion, the majority of the Commission chose defiance, under circumstances that strongly suggest they knew that federal litigation would follow. That challenge to this Court’s authority cannot stand. This Court should make respondents explain in detail why they chose a defiant course of action. It has been the law for well over a century that “[i]f courts are to be maintained and if they are to function properly in carrying out their constitutional and statutory duties, the defiance of court authority * * * cannot be tolerated. Courts must vigorously protect the dignity of their judgments, orders, and

⁴ <https://ohiochannel.org/video/ohio-redistricting-commission-2-17-2022-part-2> (accessed Feb. 18, 2022).

⁵ *Id.* Afterwards, Governor DeWine stated, “I think we should have produced a map. It might not have been everything that the Court said, but I think we could have gotten closer to what the Court was ordering us to do.” <https://bit.ly/3rVHtJs> (accessed Feb. 18, 2022).

process. All those who would by misconduct obstruct the administration of justice must be on notice that they do so at their peril.” *Hale* at 89-90; *Bright* at ¶ 18 (same).

Petitioners respectfully ask this Court to order the Commission, and all of its members, to show cause by 9:00 am on February 22, 2022, as to why they should not be held in contempt of court, with appropriate remedies to follow. In particular, the Commission and each of its members should be required to explain in detail:

- Why a constitutionally compliant map could not be drawn, including a map that meets the proportionality requirement of Section 6(B), and what steps the Commission and its members took to produce compliant maps;
- Why the Commission and its members did not consider or adopt the maps submitted by Senator Sykes and Leader Russo, the Rodden maps submitted by the Bennett petitioners, or any other maps submitted, and if they identified any defects in those maps, why those defects could not be remedied; and
- Whether the Court can order an extension of the candidate filing deadline to accommodate a revised plan.

Petitioners request the opportunity to respond three days later, by 9:00 am on February 25, 2022.

Dated: February 18, 2022

Respectfully submitted,

/s/ Brian A. Sutherland

Alicia L. Bannon (PHV 25409-2022)
Yurij Rudensky (PHV 25422-2022)
Harry Black (PHV 25544-2022)
BRENNAN CENTER FOR JUSTICE
AT NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
Tel: (646) 292-8310
Fax: (212) 463-7308
alicia.bannon@nyu.edu

Brian A. Sutherland (PHV 25406-2022)
REED SMITH LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
Tel: (415) 543-8700
Fax: (415) 391-8269
bsutherland@reedsmith.com

Peter M. Ellis (0070264)
Counsel of Record
M. Patrick Yingling (PHV 10145-2022)
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606
Tel: (312) 207-1000
Fax: (312) 207-6400
pellis@reedsmith.com

Ben R. Fliegel (PHV 25411-2022)
REED SMITH LLP
355 South Grand Avenue, Suite 2900
Los Angeles, CA 90071
Tel: (213) 457-8000
Fax: (213) 457-8080
bfliegel@reedsmith.com

Brad A. Funari (PHV 3139-2022)
Danielle L. Stewart (0084086)
Reed Smith Centre
REED SMITH LLP
225 Fifth Avenue
Pittsburgh, PA 15222
Tel: (412) 288-4583
Fax: (412) 288-3063
bfunari@reedsmith.com
dstewart@reedsmith.com

*Attorneys for Petitioners
The Ohio Organizing Collaborative, et al.*

CERTIFICATE OF SERVICE

I, Danielle L. Stewart, hereby certify that on February 18, 2022, I caused a true and correct copy of the foregoing Motion for an Order Directing Respondents to Show Cause Why They Should Not be Held in Contempt to be served by email upon the counsel listed below:

Counsel for Respondents

W. Stuart Dornette (0002955)
Beth A. Bryan (0082076)
Philip D. Williamson (0097174)
TAFT STETTINIUS & HOLLISTER LLP
425 Walnut St., Suite 1800
Cincinnati, Ohio 45202-3957
Tel: (513) 381-2838
Fax: (513) 381-0205
dornette@taftlaw.com
bryan@taftlaw.com
pwilliamson@taftlaw.com

Phillip J. Strach (PHV 25444-2021)
Thomas A. Farr (PHV 25461-2021)
John E. Branch, III (PHV 25460-2021)
Alyssa M. Riggins (PHV 25441-2021)
Greg McGuire (PHV 25483)
NELSON MULLINS RILEY &
SCARBOROUGH LLP
4140 Parklake Ave., Suite 200
Raleigh, North Carolina 27612
Tel: (919) 329-3812
Fax: (919) 329-3799
phil.strach@nelsonmullins.com
tom.farr@nelsonmullins.com
john.branch@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
greg.mcguire@nelsonmullins.com

Counsel for Respondents
Senate President Matt Huffman and
House Speaker Robert Cupp

(counsel listing continued on next page)

Erik J. Clark (0078732)
Counsel of Record
Ashley Merino (0096853)
ORGAN LAW LLP
1330 Dublin Road
Columbus, Ohio 43215
T: (614) 481-0900
F: (614) 481-0904
ejclark@organlegal.com
amerino@organlegal.com

Counsel for Respondent
Ohio Redistricting Commission

OHIO ATTORNEY GENERAL
Bridget C. Coontz (0072919)
Counsel of Record
Julie M. Pfeiffer (0069762)
Michael A. Walton (0092201)
Assistant Attorneys General
Michael J. Hendershot (0081842)
Deputy Solicitor
30 E. Broad Street, 16th Floor
Columbus, OH 43215
Tel: (614) 466-2872
Fax: (614) 728-7592
bridget.coontz@ohioago.gov
julie.pfeiffer@ohioago.gov
michael.walton@ohioago.gov
michael.hendershot@ohioago.gov

Counsel for Respondents
Governor Mike DeWine,
Secretary of State Frank LaRose, and
Auditor Keith Faber

Senator Vernon Sykes, *pro se*
Sd28@ohiosenate.gov

Minority Leader Allison Russo, *pro se*
Allison.Russo@ohiohouse.gov
Rep24@ohiohouse.gov

Counsel for *Amici Curiae*

Subodh Chandra (0069233)
Donald Screen (0044070)
Counsel of Record
THE CHANDRA LAW FIRM LLC
The Chandra Law Building
1265 West 6th Street
Cleveland, Ohio 44113
Tel: (216) 578-1700
subodh.chandra@chandralaw.com
donald.screen@chandralaw.com

Janette McCarthy Wallace (0066257)
Anthony P. Ashton*
Anna Kathryn Barnes*
NAACP
Office of the General Counsel
4805 Mount Hope Drive
Baltimore, MD 21215
Tel.: (410) 580-5777
jlouard@naacpnet.org
aashton@naacpnet.org
abarnes@naacpnet.org
*Not Admitted to the State Bar of Ohio

*Counsel for Amicus Curiae The Ohio
State Conference of the NAACP*

(counsel listing continued on next page)

Stephanie Marie Chmiel (0087555)
Mary Elizabeth Csarny (0097682)
THOMPSON HINE LLP
41 S. High Street, Suite 1700
Columbus, OH 43215
Tel.: (614) 469-3247
Fax: (614) 469-3361
stephanie.chmiel@thompsonhine.com
mary.csarny@thompsonhine.com

Counsel for Amicus Curiae David Niven

Andrew William Garth (0088905)
City Solicitor
Emily Smart Woerner (0089349)
Deputy City Solicitor
Shannon Doyle Price (0100744)
Assistant City Solicitor
CITY OF CINCINNATI
801 Plum Street, Room 214
Cincinnati, Ohio 45202
Tel.: (513) 352-3307
Fax: (513) 352-1515
emily.woerner@cincinnati-oh.gov
shannon.price@cincinnati-oh.gov

*Counsel for Amicus Curiae City of
Cincinnati*

Jon Greenbaum*
Ezra D. Rosenberg*
Pooja Chaudhuri*
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street, N.W., Ste. 900
Washington, D.C. 20005
Tel.: (202) 662-8600
jgreenbaum@lawyerscommittee.org
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org
*Not Admitted to the State Bar of Ohio

*Counsel for Amicus Curiae The Ohio
State Conference of the NAACP*

Dated: February 18, 2022

By: /s/ Danielle L. Stewart
Danielle L. Stewart
Ohio Sup. Ct. Reg. No. 0084086
Reed Smith LLP
Reed Smith Centre
225 Fifth Avenue
Pittsburgh, PA 15222
Tel: 412-288-4583
Fax: 412-288-3063
dstewart@reedsmith.com

*Attorneys for Petitioners
The Ohio Organizing Collaborative, et al.*

Donald C. Brey (0021965)
Ryan C. Spitzer (0093515)
ISAAC WILES & BURKHOLDER, LLC
Two Miranova Place, Suite 700
Columbus, Ohio 43215-5098
Tel.: (614) 221-2121
Facsimile: 614-365-9516
dbrey@isaacwiles.com

Counsel for Amicus Curiae Renew Ohio