

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GONIDAKIS, MARY PARKER,
MARGARET CONDITT, BETH
VANDERKOOI, LINDA SMITH,
DELBERT DUDUIT, THOMAS W. KIDD
JR., DUCIA HAMM,

Plaintiffs,

BRIA BENNETT, REGINA C. ADAMS,
KATHLEEN M. BRINKMAN, MARTHA
CLARK, SUSANNE L. DYKE, MERYL
NEIMAN, HOLLY OYSTER, CONSTANCE
RUBIN, EVERETT TOTTY,

Intervenor-Plaintiffs,

v.

FRANK LAROSE, in his capacity as Ohio
Secretary of State,

Defendant.

Case No. 2:22-cv-00773

Chief Judge Algenon L. Marbley
Judge Amul R. Thapar
Judge Benjamin J. Beaton

**BENNETT PETITIONERS' NOTICE OF FILING OF EXHIBITS FROM
PRELIMINARY INJUNCTION HEARING**

Intervenor-Plaintiffs Bria Bennett, Regina C. Adams, Kathleen M. Brinkman, Martha Clark, Susanne L. Dyke, Meryl Neiman, Holly Oyster, Constance Rubin, and Everett Totty (the "Bennett Petitioners") hereby file with the Court two exhibits introduced by the Bennett Petitioners that were entered into evidence without objection during from the Preliminary Injunction hearing:

1. Declaration of Rick Neal, Dated March 27, 2022.
2. Comparative Plan Statistics Table prepared by Dr. Jonathan Rodden.

Respectfully submitted,

/s/ Donald J. McTigue
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** Admitted pro hac vice
*** Motion for admission pro hac vice
pending
Counsel for Bennett Petitioners

CERTIFICATE OF SERVICE

This is to certify a copy of the foregoing was served upon all counsel of record by means of the Court's electronic filing system on this 30th Day of March, 2022.

/s/ Donald J. McTigue
Donald J. McTigue (OH 0022849)

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DECLARATION OF RICK NEAL

I, Rick Neal, hereby declare as follows:

1. I am a resident of Columbus, Ohio.
2. In the 2018 general election, I was the Democratic candidate for Ohio's 15th Congressional District, which included portions of Columbus and other parts of Franklin County, along with communities west and south of the city.
3. On February 2, 2022, the statutory deadline, I filed a declaration of candidacy and petition to run in the Democratic primary election for the Ohio House of Representatives.
4. When my declaration of candidacy was due, the Ohio Redistricting Commission's second plan, adopted January 22, was in force. I indicated on my declaration that I was running for House District 1 under the January 22 Plan, which included my residence. But I was also aware that Ohio law allowed me to change my residence, and the district in which I was running, within 30 days of the adoption of the January 22 Plan.

5. On February 7, after I filed my declaration of candidacy, the Ohio Supreme Court held the January 22 Plan unconstitutional. On February 24, the Commission adopted the Third Plan.
6. Under the Third Plan, I intended to run for office in House District 11, in Northwest Franklin County. I do not currently reside in House District 11, but much of House District 11 fell within Congressional District 15 when I ran for office there in 2018, and I have remained active in local communities in that area.
7. Under Ohio law, I had 30 days from the adoption of the Third Plan to become a resident of District 11 in order to run in that district. The deadline for me to establish residency in House District 11 was March 26, 2022.
8. On March 16, 2022, before I made arrangements to move my residence to House District 11, the Ohio Supreme Court held the Third Plan unconstitutional.
9. Because the Ohio Supreme Court had held the Third Plan unconstitutional, and because I did not know what the boundaries would be for any district I might seek to represent in any future, not-yet-enacted General Assembly plan, I did not move my residence to within House District 11 by March 26, 2022.
10. Rather, I remain a resident of Columbus, outside of House District 11.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of March, 2022.

Rick Neal

Rick Neal

Comparative Plan Statistics, Ohio House of Representatives Maps

	Third Plan (Feb. 24)	Fourth Plan (Mar. 28)	Rodden Plan	Independent Map Drawers Plan
Average compactness scores (Higher scores = more compact)				
Reock	0.39	0.39	0.41	0.41
Polsby-Popper	0.31	0.31	0.36	0.33
Area/Convex Hull	0.75	0.74	0.79	0.77
Number of split counties	38	38	32	38
Number of split VTs	135	135	96	118
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# of seats with two-party Democratic vote share >.52				
Expressed as percentage of seats	26 26.3%	28 28.28%	40 40.4%	42 42.4%
# of seats with two-party Democratic vote share <.48				
Expressed as percentage of seats	54 54.55%	54 54.55%	56 56.6%	51 51.5%
# of seats with two-party Democratic vote share between .48 and .5				
Expressed as percentage of seats	0 0.0%	0 0.0%	1 1.0%	3 3.0%
# of seats with two-party Democratic vote share between .5 and .52				
Expressed as percentage of seats	19 19.19%	17 17.17%	2 2.0%	3 3.0%
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% of <i>Democratic</i> seats when excluding all toss-up seats	32.5%	34.1%	41.7%	45.2%
% of <i>Republican</i> seats when excluding all toss-up seats	67.5%	65.9%	58.3%	54.8%