

IN THE SUPREME COURT OF OHIO

LEAGUE OF WOMEN VOTERS OF OHIO, ET
AL.,

MERYL NEIMAN, ET AL.,

v.

SECRETARY OF STATE FRANK LAROSE, ET
AL.

Case No. 2022-0303

Case No. 2022-0298

Consolidated

Original Action Filed Pursuant to
Ohio Constitution, Article XIX, Section
3(A)

AFFIDAVIT OF FREDA J. LEVENSON
PETITIONERS' EVIDENCE - NATIVE FILES

Freda J. Levenson (0045916)

Counsel of Record

ACLU OF OHIO FOUNDATION, INC.
4506 Chester Avenue
Cleveland, OH 44103
(614) 586-1972 x125
flevenson@acluohio.org

David J. Carey (0088787)

ACLU OF OHIO FOUNDATION, INC.
1108 City Park Avenue, Suite 203
Columbus, OH 43206
(614) 586-1972 x2004
dcarey@acluohio.org

Alora Thomas (PHV 22010-2022)

Julie A. Ebenstein (PHV 25423-2022)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street
New York, NY 10004
(212) 519-7866
athomas@aclu.org

Dave Yost

OHIO ATTORNEY GENERAL
Julie M. Pfeiffer (0069762)
Jonathan D. Blanton (0070035)
Michael A. Walton (0092201)
Allison D. Daniel (0096186)
Constitutional Offices Section
30 E. Broad Street, 16th Floor
Columbus, OH 43215
(614) 466-2872
Julie.Pfeiffer@OhioAGO.gov

*Counsel for Respondent Ohio Secretary of
State Frank LaRose*

Phillip J. Strach (PHV 25444-2022)

Thomas A. Farr (PHV 25461-2022)
John E. Branch, III (PHV 25460-2022)
Alyssa M. Riggins (PHV 25441-2022)
NELSON MULLINS RILEY & SCARBOROUGH
LLP
4140 Parklake Avenue, Suite 200
Raleigh, NC 27612
(919) 329-3800
phillip.strach@nelsonmullins.com

FILED

APR 25 2022

CLERK OF COURT
SUPREME COURT OF OHIO

Robert D. Fram (PHV 25414-2022)
Donald Brown (PHV 25480-2022)
David Denuyl (PHV 25452-2022)
Janelle Lamb (PHV 25909-2022)*
COVINGTON & BURLING LLP
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
(415) 591-6000
rfram@cov.com

James Smith (PHV 25421-2022)
Sarah Suwanda (PHV 25602-2022)
Alex Thomson (PHV 25462-2022)
Kimberly Plumer (PHV 25888-2022)*
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
(202) 662-6000
jmsmith@cov.com

Anupam Sharma (PHV 25418-2022)
Yale Fu (PHV 25419-2022)
COVINGTON & BURLING LLP
3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306-2112
(650) 632-4700
asharma@cov.com

*Counsel for League of Women Voters
Petitioners*

**Pro Hac Vice motions forthcoming*

W. Stuart Dornette (0002955)
Beth A. Bryan (0082076)
Philip D. Williamson (0097174)
TAFT STETTINUS & HOLLISTER LLP
425 Walnut Street, Suite 1800
Cincinnati, OH 45202-3957
(513) 381-2838
dornette@taftlaw.com

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

Erik J. Clark (0078732)
Ashley T. Merino (0096853)
ORGAN LAW LLP
1330 Dublin Road
Columbus, OH 43215
(614) 481-0900
ejclark@organlegal.com

*Counsel for Respondent Ohio Redistricting
Commission*



85FA9D61-F085-4D31-B5FC-C1899FB15B77 --- 2022/04/25 12:54:01 -8:00 --- Remote Notary

Abha Khanna (PHV 2189-2022)
Ben Stafford (PHV 25433-2022)
ELIAS LAW GROUP, LLP
1700 Seventh Avenue, Suite 2100
Seattle, WA 98101
(206) 656-0176
akhanna@elias.law

Jyoti Jasrasaria (PHV 25401-2022)
Spencer W. Klein (PHV 25432-2022)
Harleen K. Gambhir (PHV 25587-2022)
Raisa Cramer (PHV 25880-2022)
ELIAS LAW GROUP, LLP
10 G St. NE, Suite 600
Washington, DC 20002
(202) 968-4490
jjasrasaria@elias.law

Donald J. McTigue (0022849)
Derek S. Clinger (0092075)
MCTIGUE COLOMBO & CLINGER, LLC
545 East Town Street
Columbus, OH 43215
(614) 263-7000
dmctigue@electionlawgroup.com

Counsel for Neiman Petitioners

85FA9D61-F085-4D31-B5FC-C1899FB15B77 --- 2022/04/25 12:54:01 -8:00 --- Remote Notary





Native Files Affidavit.pdf

DocVerify ID: 85FA9D61-F085-4D31-B5FC-C1899FB15B77
 Created: April 25, 2022 12:54:01 -8:00
 Pages: 7
 Remote Notary: Yes / State: OH

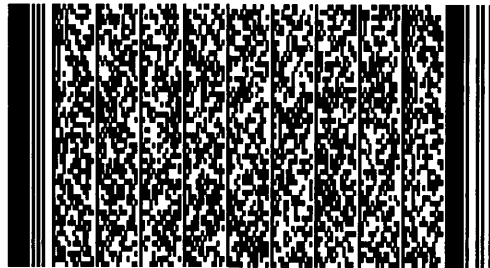
This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

E-Signature Summary

E-Signature 1: Freda Levenson (FJL)
 April 25, 2022 13:02:59 -8:00 [DF70BDF10AAB] [98.97.176.160]
 flevenson@acluohio.org (Principal) (Personally Known)

E-Signature Notary: Theresa M Sabo (TMS)
 April 25, 2022 13:02:59 -8:00 [046F681E1B9D] [74.142.214.254]
 tess.sabo@gmail.com
 I, Theresa M Sabo, did witness the participants named above electronically sign this document.



DocVerify documents cannot be altered or tampered with in any way once they are protected by the DocVerify VeriVault System. Best viewed with Adobe Reader or Adobe Acrobat. All visible electronic signatures contained in this document are symbolic representations of the persons signature, and not intended to be an accurate depiction of the persons actual signature as defined by various Acts and/or Laws.



Affidavit of Freda J. Levenson

I, Freda J. Levenson, having been duly sworn and cautioned according to law, hereby state that I am over the age of eighteen years and am competent to testify as to the facts set forth below based on my personal knowledge and having personally examined all records referenced in this affidavit, and further state as follows:

1. The Ohio Supreme Court entered an order in the above-captioned consolidated cases, *League of Women Voters of Ohio, et al. v. Secretary of State Frank LaRose, et al.*, No. 2022-0303, and *Meryl Neiman, et al., v. Secretary of State Frank LaRose, et al.*, No. 2022-0298, providing that the parties shall file any evidence they intend to present no later than Monday, April 25, 2022.
2. I am one of the counsel for Petitioners in the above-captioned case, No. 2022-0303.
3. Petitioners have delivered to the Court on a DVD a copy of the native files for the proposed amendments by Senator Vernon Sykes and Minority Leader Allison Russo to the March 1, 2022 Republican-proposed congressional district plan. These files can be accessed at <https://redistricting.ohio.gov/maps>.
4. Petitioners have delivered to the Court on a DVD a copy of the native files for Senate Bill 237, the Ohio Senate Democratic Caucus's February 8, 2022 proposed congressional district plan. These files can be accessed at <https://redistricting.ohio.gov/maps>.
5. Petitioners have delivered to the Court on a DVD a copy of the native files for the proposed congressional district plan crafted by Dr. Kosuke Imai on February 22, 2022. These files can be accessed at <https://redistricting.ohio.gov/maps>.

85FA9D61-F085-4D31-B5FC-C1899FB15B77 --- 2022/04/25 12:54:01 -8:00 --- Remote Notary



EXHIBITS APPENDIX - NATIVE FILES
Volume 1 of 1

Index of Documents

ITEM	DESCRIPTION
1	Proposed Amendments by Senator Sykes and Minority Leader Russo to the March 1, 2022 Republican-Proposed Map
2	Senate Bill 237, the Ohio Senate Democratic Caucus's February 8, 2022 Proposal For a Congressional District Plan
3	Example Congressional District Plan, Crafted by Dr. Imai on February 22, 2022
4	Congressional District Plan, Adopted by the Ohio Redistricting Commission on March 2, 2022
5	Proposed Congressional District Plan, Introduced on March 1, 2022

35FA9D61-F085-4D31-B5FC-C1899FB15B77 --- 2022/04/25 12:54:01 -8:00 --- Remote Notary



CERTIFICATE OF SERVICE

I, Freda J. Levenson, hereby certify that on this 25th day of April 2022, I caused a true and correct copy of the foregoing to be served by email upon the counsel below:

Julie M. Pfeiffer, Julie.Pfeiffer@OhioAGO.gov
Bridget C. Coontz, bridget.coontz@ohioago.gov
Jonathan Blanton, jonathan.blanton@ohioago.gov
Michael Walton, michael.walton@ohioago.gov
Allison Daniel, allison.daniel@ohioago.gov

Counsel for Respondent Secretary of State Frank LaRose

Phillip J. Strach, phil.strach@nelsonmullins.com
Thomas A. Farr, tom.farr@nelsonmullins.com
John E. Branch, III, john.branch@nelsonmullins.com
Alyssa M. Riggins, alyssa.riggins@nelsonmullins.com

W. Stuart Dornette, dornette@taftlaw.com
Beth A. Bryan, bryan@taftlaw.com
Philip D. Williamson, pwilliamson@taftlaw.com

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

Erik J. Clark, ejclark@organlegal.com

Counsel for Respondent Ohio Redistricting Commission

/s/ Freda J. Levenson
Freda J. Levenson (0045916)

*Counsel for League of Women Voters
Petitioners*

85FA9D61-F085-4D31-B5FC-C1899FB15B77 --- 2022/04/25 12:54:01 -8:00 --- Remote Notary

