

IN THE SUPREME COURT OF OHIO

**Meryl Neiman, et al.,**

**League of Women Voters of Ohio, et al.,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, et al.,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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NEIMAN PETITIONERS' EVIDENCE – VOLUME 4 OF EXHIBITS

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*Petitioners*

<b><u>VOLUME 4</u></b>		
<b>EX.</b>	<b>DESCRIPTION</b>	<b>BATES RANGE</b>
33	AOS_000210	NEIMAN_EVID_00499- NEIMAN_EVID_00500
34	AOS_000464-AOS_000465	NEIMAN_EVID_00501- NEIMAN_EVID_00503
35	AOS_000466-AOS_000467	NEIMAN_EVID_00504- NEIMAN_EVID_00506
36	AOS_000469-AOS_000470	NEIMAN_EVID_00507- NEIMAN_EVID_00509
37	AOS_000483-AOS_000484	NEIMAN_EVID_00510- NEIMAN_EVID_00512
38	AOS_000503-AOS_000505	NEIMAN_EVID_00513- NEIMAN_EVID_00516
39	AOS_000512-AOS_000513	NEIMAN_EVID_00517- NEIMAN_EVID_00519
40	AOS_000525-AOS_000526	NEIMAN_EVID_00520- NEIMAN_EVID_00522
41	AOS_000529-AOS_000531	NEIMAN_EVID_00523- NEIMAN_EVID_00526
42	AOS_000548	NEIMAN_EVID_00527- NEIMAN_EVID_00528
43	AOS_000550	NEIMAN_EVID_00529- NEIMAN_EVID_00530
44	AOS_000552	NEIMAN_EVID_00531- NEIMAN_EVID_00532
45	AOS_000554	NEIMAN_EVID_00533- NEIMAN_EVID_00534
46	AOS_000580-AOS_000583	NEIMAN_EVID_00535- NEIMAN_EVID_00539
47	AOS_000687-AOS_000688	NEIMAN_EVID_00540- NEIMAN_EVID_00542
48	AOS_001290-AOS_001302	NEIMAN_EVID_00543- NEIMAN_EVID_00556
49	AOS_001306-AOS_001312	NEIMAN_EVID_00557- NEIMAN_EVID_00564
50	AOS_001392-AOS_001393	NEIMAN_EVID_00565- NEIMAN_EVID_00567

51	AOS_001444-AOS_001448	NEIMAN_EVID_00568- NEIMAN_EVID_00569
52	AOS_001452	NEIMAN_EVID_00574- NEIMAN_EVID_00575
53	CUPP000001-CUPP000002	NEIMAN_EVID_00576- NEIMAN_EVID_00578
54	CUPP000010 and five images files attached thereto	NEIMAN_EVID_00579- NEIMAN_EVID_00585
55	DiRossi_000078	NEIMAN_EVID_00586- NEIMAN_EVID_00587
56	DiRossi_000125	NEIMAN_EVID_00588- NEIMAN_EVID_00589
57	DiRossi_000154-DiRossi_000155	NEIMAN_EVID_00590- NEIMAN_EVID_00592
58	DiRossi_000165-DiRossi_000166	NEIMAN_EVID_00593- NEIMAN_EVID_00595
59	GOV_000196- GOV_000197	NEIMAN_EVID_00596- NEIMAN_EVID_00598
60	Huffman_001755	NEIMAN_EVID_00599- NEIMAN_EVID_00600
61	Huffman_002038-Huffman_002039	NEIMAN_EVID_00601- NEIMAN_EVID_00603
62	Huffman_002060-Huffman_002061	NEIMAN_EVID_00604- NEIMAN_EVID_00606
63	SOS_000630-SOS_000631	NEIMAN_EVID_00607- NEIMAN_EVID_00609
64	SOS_000780	NEIMAN_EVID_00610- NEIMAN_EVID_00611
65	SOS_000781-SOS_000786	NEIMAN_EVID_00612- NEIMAN_EVID_00618
66	SPRINGHETTI_000032-SPRINGHETTI_000043	NEIMAN_EVID_00619- NEIMAN_EVID_00631
67	SPRINGHETTI_000094-SPRINGHETTI_000095	NEIMAN_EVID_00632- NEIMAN_EVID_00634
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## CERTIFICATE OF SERVICE

I hereby certify that Neiman Petitioners' Evidence – Volume 4 of Exhibits was sent via email this 25<sup>th</sup> day of April 2022 to the following:

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*Counsel for League of Women Voters of Ohio Petitioners*

/s/ Derek S. Clinger  
Derek S. Clinger

# **Neiman Petitioners' Exhibit 33**

**From:** Emily Redman <eredman12@icloud.com>

**To:** Emily Redman <eredman@ohioauditor.gov>

**Subject:** [External]Fwd: CD BAF March 1st

**Date:** Wed, 2 Mar 2022 23:32:44 -0500

**Importance:** Normal

**Attachments:** Faber\_CD\_BAF\_March\_1.xlsx

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You don't often get email from eredman12@icloud.com. [Learn why this is important](#)

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Sent from my iPhone

Begin forwarded message:

**From:** "DiRossi, Ray" <Ray.DiRossi@ohiosenate.gov>

**Date:** March 2, 2022 at 8:08:45 PM EST

**To:** eredman12@icloud.com

**Subject:** CD BAF March 1st

Emily

Auditor Faber asked me to balance this map out and clean up some of the unintentional splits  
I just spoke with him that I was sending it

See attached BAF

I didn't go all the way down to precinct analysis to see if some of the precinct splits could be eliminated and cleaned up  
- he is aware of that

I also think there might be a few districts that he would want to change the geography on

I was just getting it balanced and quick level of clean up

See attached

Ray

# **Neiman Petitioners' Exhibit 34**

**From:** "Pohlabel, Adam" <Adam.Pohlabel@ohiosenate.gov>

**To:** "eeredman@ohioauditor.gov" <eeredman@ohioauditor.gov>

**Subject:** [External]Letter from President Huffman

**Date:** Fri, 25 Feb 2022 18:11:56 +0000

**Importance:** Normal

**Attachments:** Letter\_to\_Auditor\_Faber.pdf

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Emily,

Please see the attached letter from President Huffman.

Best,

**Adam Pohlabel**

Sr. Legislative Aide

Senate President Matt Huffman

614-466-7584

Adam.Pohlabel@OhioSenate.gov



**Matt Huffman**  
Senate President

Statehouse  
1 Capitol Square  
Columbus, Ohio 43215

February 25, 2022

Auditor Faber,

As the Ohio Redistricting Commission completes a Congressional District Plan in accordance with the parameters laid out in the Constitution and the Ohio Supreme Court's opinions, I invite you to share any specific ideas or suggestions for a plan in advance of the Commission's planned meeting next week.

I have directed Ray DiRossi from my office to make himself available to meet with you over the next four days in order to discuss any proposals you may have developed. Please let him know if there are any times that are convenient for you to meet.

I look forward to continuing our work together as the redistricting process continues.

Sincerely,

A handwritten signature in black ink that reads "Matt Huffman". The signature is fluid and cursive.

Matt Huffman  
Senate President  
State Senator, 12<sup>th</sup> District

# **Neiman Petitioners' Exhibit 35**

**From:** "Christine.Morrison@ohiohouse.gov" <Christine.Morrison@ohiohouse.gov>

**To:** "Sloan T. Spalding" <STSpalding@ohioauditor.gov>, "jmauk@ohiosos.gov" <jmauk@ohiosos.gov>, "Mike.Rowe@ohiosenate.gov" <Mike.Rowe@ohiosenate.gov>, "Andy.DiPalma@ohiohouse.gov" <Andy.DiPalma@ohiohouse.gov>, "John.Barron@ohiosenate.gov" <John.Barron@ohiosenate.gov>, "Michael.Hall@governor.ohio.gov" <Michael.Hall@governor.ohio.gov>, "Aaron.Crooks@governor.ohio.gov" <Aaron.Crooks@governor.ohio.gov>

**Subject:** [External]Letter to Commission members from Speaker Cupp

**Date:** Fri, 25 Feb 2022 22:08:17 +0000

**Importance:** Normal

**Attachments:** Letter\_to\_Commission\_Members.pdf

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You don't often get email from christine.morrison@ohiohouse.gov. [Learn why this is important](#)

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Good evening,  
Please see the attached letter from Speaker Cupp.

Thanks,  
Christine

Christine Morrison, Chief of Staff  
Ohio House of Representatives  
614/466-2235

ROBERT R. CUPP  
SPEAKER OF THE HOUSE  
OHIO HOUSE OF REPRESENTATIVES  
DISTRICT 04



77 S. HIGH STREET, 14<sup>TH</sup> FLOOR  
COLUMBUS, OH 43125  
REP04@OHIOHOUSE.GOV

February 25, 2022

Members of the Ohio Redistricting Commission,

As work continues on the development of Congressional Districts in accordance with the parameters laid out in the Constitution and the Ohio Supreme Court's recent ruling, I invite you to work directly with Blake Springhetti to share any specific ideas or suggestions for a plan. Please let him know if there are any times that are convenient for you to meet.

I look forward to working with you as the redistricting process continues.

Sincerely,

A handwritten signature in cursive script that reads "Robert R. Cupp".

Bob Cupp  
Speaker

# **Neiman Petitioners' Exhibit 36**



Feb. 11, 2022

Dear Commissioners,

We write today to urge the Redistricting Commission to meet as soon as possible so that we may adopt constitutional state legislative and congressional maps. The Supreme Court of Ohio has twice directed us to adopt maps that reflect the preferences of Ohio voters and to draw maps that do not unduly favor any political party. While the Supreme Court and the Ohio Constitution have given us imminent deadlines – these are not impossible tasks in the time allotted. As we have repeatedly indicated, we stand at the ready and are available to meet at any time to get to work.

We have put forward numerous state legislative district maps and congressional district maps; including, most recently on January 28, 2022<sup>1</sup> and February 8, 2022<sup>2</sup> respectively. These maps comply with the Constitution and the Court's orders and should be a part of the Commission's public deliberations. If we work expeditiously, we believe the primary can proceed with minimal disruptions or, if necessary, we can work within the legislature to accommodate an adjusted primary schedule.

There has been much talk of "crisis" and "chaos," but we are all more than capable of working together to adopt constitutional maps and to ensure a smooth election process. It is not a constitutional crisis to have to work in a bipartisan fashion. In fact, this is the work we swore an oath to do – to uphold the Constitution and obey the rule of law.

We have directed our staff to work with yours in accordance with the Court's orders. Our staff and consultants are available to you at your convenience. While we have shared our maps with

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<sup>1</sup> The maps we have drawn have been publicly available for some time. The state legislative maps are those Senator Sykes and Leader Russo filed with the Court on January 28, 2022. The block assignment files have been available for download on the Dave's Redistricting public website and are uploaded to the Commission website as well. Block assignment files for a nearly identical version of these maps have been available on the Commission website since January 24, 2022.

<sup>2</sup> Senate Minority Leader Yuko and House Minority Leader Russo released a revised congressional district map publicly on Feb. 8, 2022. The block assignment files are on the Commission website. An earlier version of this congressional map that also meets the requirements of the Constitution and the Court's order has been available on the Commission website since November 10, 2021.

your offices individually and with the public at large, we have not received any state or congressional map proposals from your offices since the Court's orders. Sharing any possible map proposals allows us to work cooperatively and affords an opportunity for the Commission and the public to analyze maps. We await and welcome your feedback on our submitted maps. Any proposed changes that are in line with the Court's orders could be quickly incorporated and adopted.

The Court has given the Redistricting Commission clear instructions on what makes a constitutional state legislative or congressional map and has charged us to rise above partisan interests and work for Ohioans and the reforms voters have enshrined in our state Constitution.

Respectfully,



Senator Vernon Sykes  
Co-Chair, Ohio Redistricting Commission  
Senate District 28



C. Allison Russo  
House Minority Leader  
Commissioner, Ohio Redistricting Commission  
House District 24

# **Neiman Petitioners' Exhibit 37**

**From:** "Rowe, Mike" <Mike.Rowe@ohiosenate.gov>

**To:** "Christine.Morrison@ohiohouse.gov" <Christine.Morrison@ohiohouse.gov>, "Paul.Disantis@ohiohouse.gov" <Paul.Disantis@ohiohouse.gov>

**Cc:** "Barron, John" <John.Barron@ohiosenate.gov>, "Strigari, Frank" <Frank.Strigari@ohiosenate.gov>, "Oliveti, Chris" <coliveti@OhioSOS.Gov>, Emily Redman <EERedman@ohioauditor.gov>, "Sloan T. Spalding" <STSpalding@ohioauditor.gov>, "Andy.DiPalma@ohiohouse.gov" <Andy.DiPalma@ohiohouse.gov>, "Sarah.Cherry@ohiohouse.gov" <Sarah.Cherry@ohiohouse.gov>, "Aaron.Crooks@governor.ohio.gov" <Aaron.Crooks@governor.ohio.gov>, "Boas, George" <George.Boas@ohiosenate.gov>, "Rothey, Kristin" <Kristin.Rothey@ohiosenate.gov>, "Stockman, Scott" <Scott.Stockman@ohiosenate.gov>, "jmauk@ohiosos.gov" <jmauk@ohiosos.gov>, "matthew.donahue@governor.ohio.gov" <matthew.donahue@governor.ohio.gov>, "mgrodhaus@ohiosos.gov" <mgrodhaus@ohiosos.gov>, "Routt, Randall" <Randall.Routt@ohiosenate.gov>

**Subject:** [External]Proposal for Redistricting Commission meetings

**Date:** Fri, 25 Feb 2022 21:26:18 +0000

**Importance:** Normal

**Attachments:** Sykes\_to\_Cupp\_-\_Feb\_25,\_2022.pdf

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Hello,

Please see the attached memo from Senator Sykes to Speaker Cupp regarding proposed meeting times next week for the Ohio Redistricting Commission.

*Mike Rowe*

Chief of Staff  
Ohio Senate Minority Caucus  
614-466-4371



## OHIO SENATE DEMOCRATIC CAUCUS

To: Speaker Bob Cupp, Co-Chair, Ohio Redistricting Commission  
From: Senator Vernon Sykes, Co-Chair, Ohio Redistricting Commission  
Date: February 25, 2022  
RE: Upcoming Commission Meetings

I would like to propose that we schedule meetings of the Ohio Redistricting Commission next Tuesday, March 1, at 4:00 pm, and next Wednesday, March 2, at 4:00 pm (or after session concludes).

The purpose of the meetings would be to discuss congressional redistricting and receive additional public testimony.

I look forward to hearing from you.

CC: Ohio Redistricting Commission members

# **Neiman Petitioners' Exhibit 38**

**From:** "Aaron.Crooks@governor.ohio.gov" <Aaron.Crooks@governor.ohio.gov>

**To:** Emily Redman <EERedman@ohioauditor.gov>,  
"RANDALL.ROUTT@OHIOSENATE.GOV" <RANDALL.ROUTT@OHIOSENATE.GOV>

**Cc:** "Oliveti, Chris" <coliveti@OhioSOS.Gov>, "Sarah.Cherry@ohiohouse.gov"  
<Sarah.Cherry@ohiohouse.gov>, "chris@projectgovern.com" <chris@projectgovern.com>,  
"Blake.Springhetti@ohiohouse.gov" <Blake.Springhetti@ohiohouse.gov>,  
"RAY.DIROSSI@OHIOSENATE.GOV" <RAY.DIROSSI@OHIOSENATE.GOV>

**Subject:** [External]RE: [External]RE: [EXTERNAL] Congressional map drawing discussion meeting

**Date:** Tue, 22 Feb 2022 22:45:00 +0000

**Importance:** Normal

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Please let me know as well.

Aaron Crooks  
Director of Legislative Affairs  
Office of Governor Mike DeWine

---

**From:** Emily Redman <EERedman@ohioauditor.gov>

**Sent:** Tuesday, February 22, 2022 5:22 PM

**To:** Routt, Randall <RANDALL.ROUTT@OHIOSENATE.GOV>

**Cc:** Oliveti, Chris <coliveti@OhioSOS.Gov>; Cherry, Sarah <Sarah.Cherry@ohiohouse.gov>; Crooks, Aaron <Aaron.Crooks@governor.ohio.gov>; 'chris@projectgovern.com' <chris@projectgovern.com>; 'Blake.Springhetti@ohiohouse.gov' <Blake.Springhetti@ohiohouse.gov>; Dirossi, Raymond <RAY.DIROSSI@OHIOSENATE.GOV>

**Subject:** RE: [External]RE: [EXTERNAL] Congressional map drawing discussion meeting

Randall –

Echoing what Chris said – I could meet tomorrow morning or when everyone is available.

Thanks,  
Emily

---

**From:** Oliveti, Chris <coliveti@OhioSOS.Gov>

**Sent:** Tuesday, February 22, 2022 5:02 PM

**To:** Routt, Randall <Randall.Routt@ohiosenate.gov>; DiRossi, Ray <Ray.DiRossi@ohiosenate.gov>;

'Blake.Springhetti@ohiohouse.gov' <Blake.Springhetti@ohiohouse.gov>; Emily Redman <EERedman@ohioauditor.gov>; Sarah.Cherry@ohiohouse.gov; 'Aaron.Crooks@governor.ohio.gov' <Aaron.Crooks@governor.ohio.gov>; 'chris@projectgovern.com' <chris@projectgovern.com>

**Subject:** [External]RE: [EXTERNAL] Congressional map drawing discussion meeting

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Thanks for reaching out Randall. I can't speak for all, but I could meet as early as tomorrow morning to discuss congressional maps.


Let me know if that's doable for all, if not, I'm flexible.

V/R

Chris

**Chris Oliveti | Director of Legislative Affairs**

Office of the Ohio Secretary of State

 logo for the Office of Frank LaRose Ohio Secretary of State

**O:** 614.728.7590

**C:** 614.306.7109

[OhioSoS.gov](http://OhioSoS.gov)

This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

**From:** Routt, Randall <[Randall.Routt@ohiosenate.gov](mailto:Randall.Routt@ohiosenate.gov)>

**Sent:** Tuesday, February 22, 2022 4:32 PM

**To:** DiRossi, Ray <[Ray.DiRossi@ohiosenate.gov](mailto:Ray.DiRossi@ohiosenate.gov)>; 'Blake.Springhetti@ohiohouse.gov' <[Blake.Springhetti@ohiohouse.gov](mailto:Blake.Springhetti@ohiohouse.gov)>; 'eeredman@ohioauditor.gov' <[eeredman@ohioauditor.gov](mailto:eeredman@ohioauditor.gov)>; Sarah.Cherry@ohiohouse.gov; Oliveti, Chris <[coliveti@OhioSOS.Gov](mailto:coliveti@OhioSOS.Gov)>; 'Aaron.Crooks@governor.ohio.gov' <[Aaron.Crooks@governor.ohio.gov](mailto:Aaron.Crooks@governor.ohio.gov)>; 'chris@projectgovern.com' <[chris@projectgovern.com](mailto:chris@projectgovern.com)>

**Subject:** [EXTERNAL] Congressional map drawing discussion meeting

\*\*\*\*Secretary of State Security Notice\*\*\*\*

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Hello Everyone,

We, Senate and House Democratic staff, are available to meet to begin drawing a constitutionally compliant congressional map as soon as possible. We understand that the Speaker indicated to Sen. Sykes that he wanted to start with the map passed by the General Assembly and apply the Constitution and Court order from there. Let us know when you are available and who your designated staff person or map drawer is for working sessions. Please let us know if there are other map drawers that we should include in this invitation.

We are also available to work on state legislative maps.

Thanks,

Randall Routt  
Policy Advisor  
Senate Democratic Caucus  
614-466-6110

---

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# **Neiman Petitioners' Exhibit 39**

**From:** "Rowe, Mike" <Mike.Rowe@ohiosenate.gov>

**To:** Emily Redman <EERedman@ohioauditor.gov>

**Subject:** [External]Re: [External]Meet to discuss amendments

**Date:** Tue, 1 Mar 2022 22:31:11 +0000

**Importance:** Normal

---

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Hi Emily,

Thanks for getting back to me. Sykes and Russo are meeting with the Speaker right now. I will get back to you on a time when that meeting wraps up.

Mike

Sent from my iPhone

On Mar 1, 2022, at 4:41 PM, Emily Redman <EERedman@ohioauditor.gov> wrote:

Mike -

We would love to see any proposals y'all have. What time would you want us to come over?

Thanks,  
Emily

---

**From:** Rowe, Mike <Mike.Rowe@ohiosenate.gov>

**Sent:** Tuesday, March 1, 2022 3:53 PM

**To:** Emily Redman <EERedman@ohioauditor.gov>

**Subject:** [External]Meet to discuss amendments

\*\*\* Auditor of State Security Notice \*\*\* This e-mail is from an external source. Think before you click links or open attachments.

---

Hello Emily,

We'd like to invite Auditor Faber or a representative to meet this evening to discuss our ideas to amend the congressional map. I can be reached on my cell phone 614-286-6892.

Mike Rowe

Sent from my iPhone

---



# **Neiman Petitioners' Exhibit 40**

**From:** "Routt, Randall" <Randall.Routt@ohiosenate.gov>

**To:** 'Emily Redman' <EERedman@ohioauditor.gov>, "eredman12@icloud.com" <eredman12@icloud.com>

**Cc:** "chris@projectgovern.com" <chris@projectgovern.com>, "Rowe, Mike" <Mike.Rowe@ohiosenate.gov>, "Sarah.Cherry@ohiohouse.gov" <Sarah.Cherry@ohiohouse.gov>

**Subject:** [External]FW: Auditor Faber Email

**Date:** Wed, 2 Mar 2022 15:04:09 +0000

**Importance:** Normal

**Attachments:** Faber\_Equal\_Pop\_-\_Daves\_BAF.csv; Faber\_Equal\_Pop\_-\_Maptitude\_BAF.xlsx; Faber\_as\_Sent\_OCURD.xlsx; Faber\_Equal\_Population\_Congressional\_Map.pdf

---

\*\*\* Auditor of State Security Notice \*\*\* This e-mail is from an external source. Think before you click links or open attachments.

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---

**From:** Project Govern <chris@projectgovern.com>

**Sent:** Wednesday, March 02, 2022 9:48 AM

**To:** Routt, Randall <Randall.Routt@ohiosenate.gov>

**Subject:** Re: Auditor Faber Email

Hi Emily,

Included are 4 files and a link-

1. The OCRUD ratings of the map you sent.
2. A BAF of an equal population version of the map you sent
3. A Dave's BAF of the same
4. Dave's link to same - <https://davesredistricting.org/join/2574c872-35c0-46d0-86fa-5eb671a0ebea>
5. The OCRUD ratings of the same.

---

**From:** Emily Redman <EERedman@ohioauditor.gov>

**Sent:** Tuesday, March 1, 2022 10:01 PM


**To:** [Mike.Rowe@ohiosenate.gov](mailto:Mike.Rowe@ohiosenate.gov) <[Mike.Rowe@ohiosenate.gov](mailto:Mike.Rowe@ohiosenate.gov)>; [Sarah.Cherry@ohiohouse.gov](mailto:Sarah.Cherry@ohiohouse.gov) <[Sarah.Cherry@ohiohouse.gov](mailto:Sarah.Cherry@ohiohouse.gov)>; [Randall.Routt@ohiosenate.gov](mailto:Randall.Routt@ohiosenate.gov) <[randall.routt@ohiosenate.gov](mailto:randall.routt@ohiosenate.gov)>; Project Govern <[chris@projectgovern.com](mailto:chris@projectgovern.com)>

**Subject:** Auditor Faber Email

All -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there is some necessary cleaning up to finalize the districts, but you can see what he discussed with y'all this evening as potential changes. Please let me know if you have any questions.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>

 <https://d2jpn56mbm1ic9.cloudfront.net/07e0d237-44eb-4a9b-9da9-4957a2244b5e.png>

Update 03.01.22

Redistricting Map

[davesredistricting.org](https://davesredistricting.org)

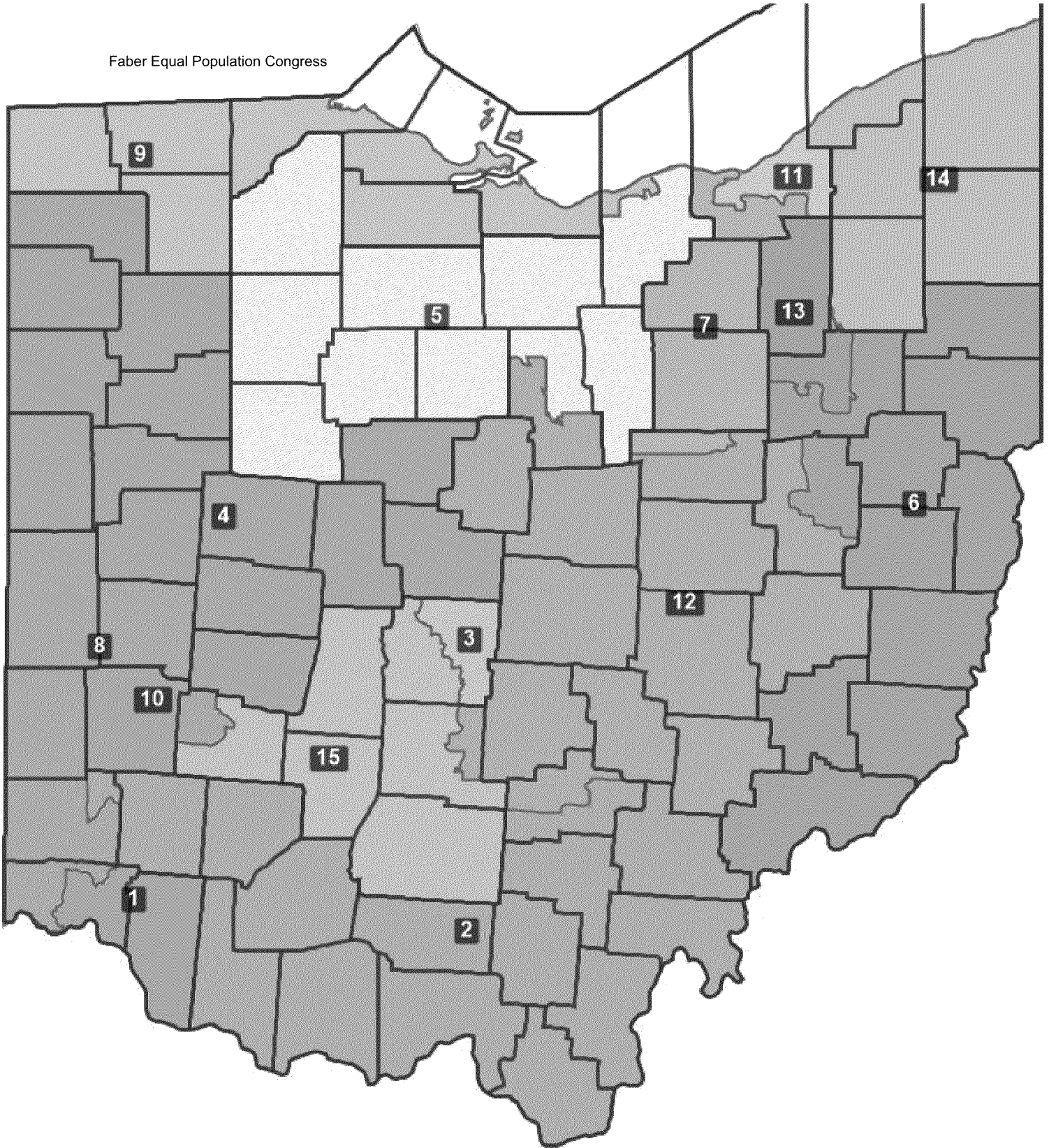
Best,  
Emily

---

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# **Neiman Petitioners' Exhibit 41**

Faber Equal Population Congress



District	Population	Deviation	Deviation%	18+ BVAP	18+ HVAP	18+ AVAP	REP 16-20	DEM 16-20
1	786,630	0	0.00%	22.11%	3.21%	3.37%	45.95%	54.05%
2	786,630	0	0.00%	3.57%	1.77%	2.71%	67.17%	32.84%
3	786,630	0	0.00%	30.16%	5.62%	6.22%	32.17%	67.83%
4	786,630	0	0.00%	4.50%	2.73%	3.33%	69.19%	30.81%
5	786,629	-1	0.00%	4.83%	3.89%	1.51%	60.14%	39.86%
6	786,630	0	0.00%	6.75%	2.54%	0.75%	59.32%	40.68%
7	786,630	0	0.00%	7.18%	2.87%	2.82%	51.68%	48.32%
8	786,630	0	0.00%	9.31%	3.63%	3.51%	66.37%	33.63%
9	786,630	0	0.00%	13.86%	7.40%	1.52%	48.35%	51.65%
10	786,630	0	0.00%	17.37%	3.21%	3.03%	53.71%	46.29%
11	786,630	0	0.00%	40.82%	7.07%	4.21%	23.21%	76.79%
12	786,629	-1	0.00%	3.96%	1.43%	1.50%	66.74%	33.26%
13	786,630	0	0.00%	13.55%	2.19%	3.42%	47.57%	52.43%
14	786,630	0	0.00%	5.68%	2.52%	1.50%	54.83%	45.17%
15	786,630	0	0.00%	9.95%	4.64%	4.90%	50.39%	49.61%

District	Population	Deviation	Deviation%	18+ BVAP	18+ HVAP	18+ AVAP	REP 16-20	DEM 16-20
11	786,630	0	0.00%	40.82%	7.07%	4.21%	23.21%	76.79%
3	786,630	0	0.00%	30.16%	5.62%	6.22%	32.17%	67.83%
1	786,630	0	0.00%	22.11%	3.21%	3.37%	45.95%	54.05%
13	786,630	0	0.00%	13.55%	2.19%	3.42%	47.57%	52.43%
9	786,630	0	0.00%	13.86%	7.40%	1.52%	48.35%	51.65%
15	786,630	0	0.00%	9.95%	4.64%	4.90%	50.39%	49.61%
7	786,630	0	0.00%	7.18%	2.87%	2.82%	51.68%	48.32%
10	786,630	0	0.00%	17.37%	3.21%	3.03%	53.71%	46.29%
14	786,630	0	0.00%	5.68%	2.52%	1.50%	54.83%	45.17%
6	786,630	0	0.00%	6.75%	2.54%	0.75%	59.32%	40.68%
5	786,629	-1	0.00%	4.83%	3.89%	1.51%	60.14%	39.86%
8	786,630	0	0.00%	9.31%	3.63%	3.51%	66.37%	33.63%
12	786,629	-1	0.00%	3.96%	1.43%	1.50%	66.74%	33.26%
2	786,630	0	0.00%	3.57%	1.77%	2.71%	67.17%	32.84%
4	786,630	0	0.00%	4.50%	2.73%	3.33%	69.19%	30.81%

# **Neiman Petitioners' Exhibit 42**

**From:** "Emily Redman" <EERedman@ohioauditor.gov>

**To:** "Mike.Rowe@ohiosenate.gov" <Mike.Rowe@ohiosenate.gov>,  
"Sarah.Cherry@ohiohouse.gov" <Sarah.Cherry@ohiohouse.gov>,  
"Randall.Routt@ohiosenate.gov" <randall.routt@ohiosenate.gov>, "Project Govern"  
<chris@projectgovern.com>

**Subject:** Auditor Faber Email

**Date:** Wed, 02 Mar 2022 03:01:29 -0000

**Importance:** Normal

**Attachments:** Blocks\_03.01.xlsx

---

All -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there is some necessary cleaning up to finalize the districts, but you can see what he discussed with y'all this evening as potential changes. Please let me know if you have any questions.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>



Update 03.01.22

Redistricting Map

davesredistricting.org

Best,  
Emily

# **Neiman Petitioners' Exhibit 43**

**From:** "Emily Redman" <EERedman@ohioauditor.gov>

**To:** "Olivet, Chris" <coliveti@OhioSOS.Gov>, "Aaron.Crooks@governor.ohio.gov" <Aaron.Crooks@governor.ohio.gov>

**Subject:** Auditor Faber Email

**Date:** Wed, 02 Mar 2022 02:58:09 -0000

**Importance:** Normal

**Attachments:** Blocks\_03.01.xlsx

---

Chris and Aaron -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there would be some necessary cleaning up to finalize the districts, but you can see what he has been discussing as potential changes. Please let me know if you have any questions.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>



Update 03.01.22

Redistricting Map

davesredistricting.org

Best,  
Emily

# **Neiman Petitioners' Exhibit 44**

**From:** "Emily Redman" <EERedman@ohioauditor.gov>

**To:** "bob.cupp@ohiohouse.gov" <bob.cupp@ohiohouse.gov>, "rcupp@bright.net" <rcupp@bright.net>

**Cc:** "Blake.Springhetti@ohiohouse.gov" <Blake.Springhetti@ohiohouse.gov>

**Subject:** Auditor Faber Email

**Date:** Wed, 02 Mar 2022 02:54:30 -0000

**Importance:** Normal

**Attachments:** Blocks\_03.01.xlsx

---

Speaker Cupp -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there would be some necessary cleaning up to finalize the districts, but you can see what I believe he has discussed with you as potential changes.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>



Update 03.01.22

Redistricting Map

davesredistricting.org

Best,  
Emily Redman

# **Neiman Petitioners' Exhibit 45**

**From:** "Emily Redman" <EERedman@ohioauditor.gov>

**To:** "DiRossi, Ray" <Ray.DiRossi@ohiosenate.gov>

**Cc:** "State Senator Matt Huffman" <huffman@ohiosenate.gov>

**Bcc:** "James M. Coyne" <JMCoyne@ohioauditor.gov>

**Subject:** Auditor Faber Email

**Date:** Tue, 01 Mar 2022 22:30:05 -0000

**Importance:** Normal

**Attachments:** Blocks\_03.01.xlsx

---

From Auditor Faber -

Here's a much more compact version of the map that was discussed today at the Commission meeting. Attached is the BAF and here is a link to Dave's: <https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>. Depending on what the Democrats want, more compromise could be down in District 1. Again, this is for discussion and needs to be cleaned up.

Auditor Faber continues to have concerns that have been discussed.



Update 03.01.22

Redistricting Map

[davesredistricting.org](https://davesredistricting.org)

Best,  
Emily

# **Neiman Petitioners' Exhibit 46**

**From:** "Emily Redman" <EERedman@ohioauditor.gov>

**To:** "Bob Cupp" <rcupp@bright.net>

**Subject:** Re: [External]RE: Auditor Faber Email

**Date:** Wed, 02 Mar 2022 03:59:38 -0000

**Importance:** Normal

**Attachments:** March\_1\_Districts.pdf

---

Speaker -

I sincerely apologize for the trouble. Attached is a PDF of the map images from Dave's. Page one is district lines with partisan lean and page two is districts in colors with county lines shown. Please let me know if you need something else or if this does not come through the way you like.

Best,  
Emily

---

**From:** Bob Cupp <rcupp@bright.net>

**Sent:** Tuesday, March 1, 2022 10:39 PM

**To:** Emily Redman <EERedman@ohioauditor.gov>

**Subject:** [External]RE: Auditor Faber Email

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---

Thanks for sending this my way. Is there a way to print the map? The map disappears when I attempt to print it with my browser linked but not signed into Dave's Redistricting.

---

**From:** Emily Redman <EERedman@ohioauditor.gov>

**Sent:** Tuesday, March 1, 2022 9:55 PM

**To:** bob.cupp@ohiohouse.gov; rcupp@bright.net

**Cc:** Blake.Springhetti@ohiohouse.gov

**Subject:** Auditor Faber Email

Speaker Cupp -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there would be some necessary cleaning up to finalize the districts, but you can see what I believe he has discussed with you as potential changes.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>



Update 03.01.22

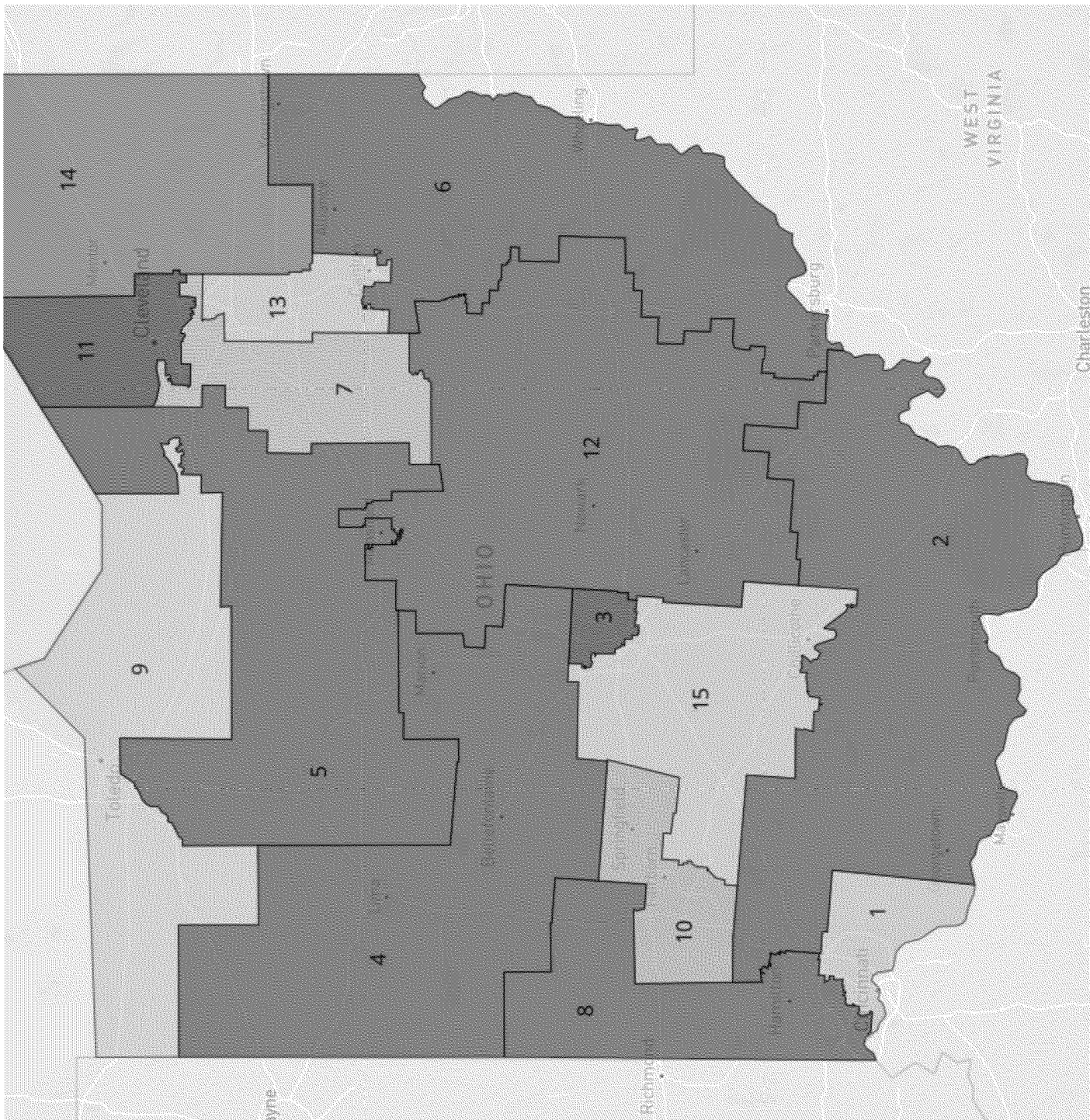
Redistricting Map

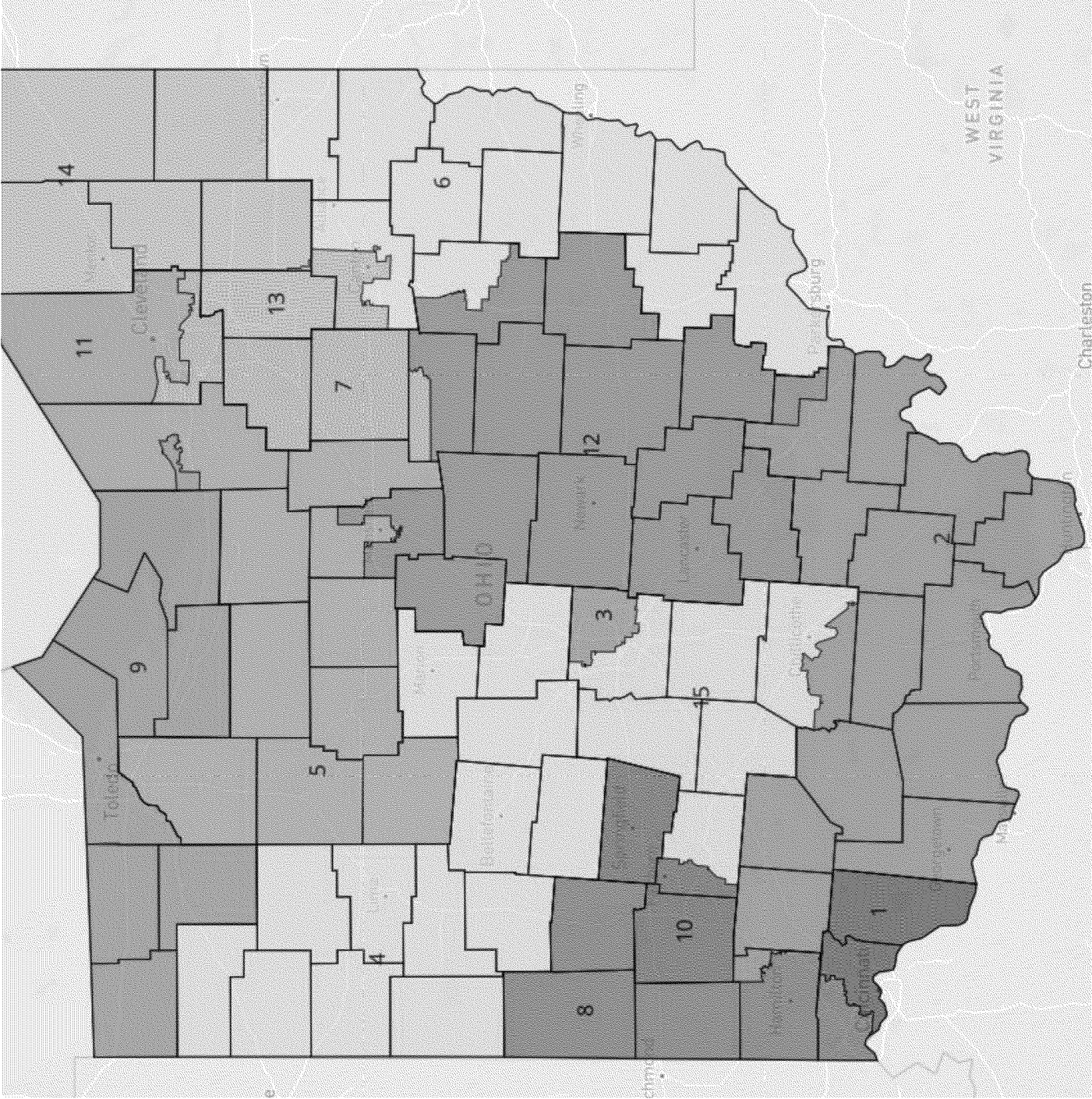
[davesredistricting.org](https://davesredistricting.org)

Best,  
Emily Redman

---

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# **Neiman Petitioners' Exhibit 47**

**From:** "Sarah.Cherry@ohiohouse.gov" <Sarah.Cherry@ohiohouse.gov>

**To:** Emily Redman <EERedman@ohioauditor.gov>, "Mike.Rowe@ohiosenate.gov" <Mike.Rowe@ohiosenate.gov>, "Randall.Routt@ohiosenate.gov" <Randall.Routt@ohiosenate.gov>, 'Project Govern' <chris@projectgovern.com>

**Subject:** [External]Re: Auditor Faber Email

**Date:** Wed, 2 Mar 2022 13:48:46 +0000

**Importance:** Normal

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Thanks, Emily.

**Sarah A. Cherry**

*Legal Counsel, Minority Caucus*

*she/her/hers*

Ohio House of Representatives

77 South High Street, 14th Floor

Columbus, OH 43215

office: (614) 466-6040

[sarah.cherry@ohiohouse.gov](mailto:sarah.cherry@ohiohouse.gov)

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**From:** Emily Redman <EERedman@ohioauditor.gov>

**Sent:** Tuesday, March 1, 2022 10:01 PM

**To:** Rowe, Mike; Cherry, Sarah; Routt, Randall; 'Project Govern'

**Subject:** Auditor Faber Email

All -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there is some necessary cleaning up to finalize the districts, but you can see what he discussed with y'all this evening as potential changes. Please let me know if you have any questions.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>

Update 03.01.22

Redistricting Map



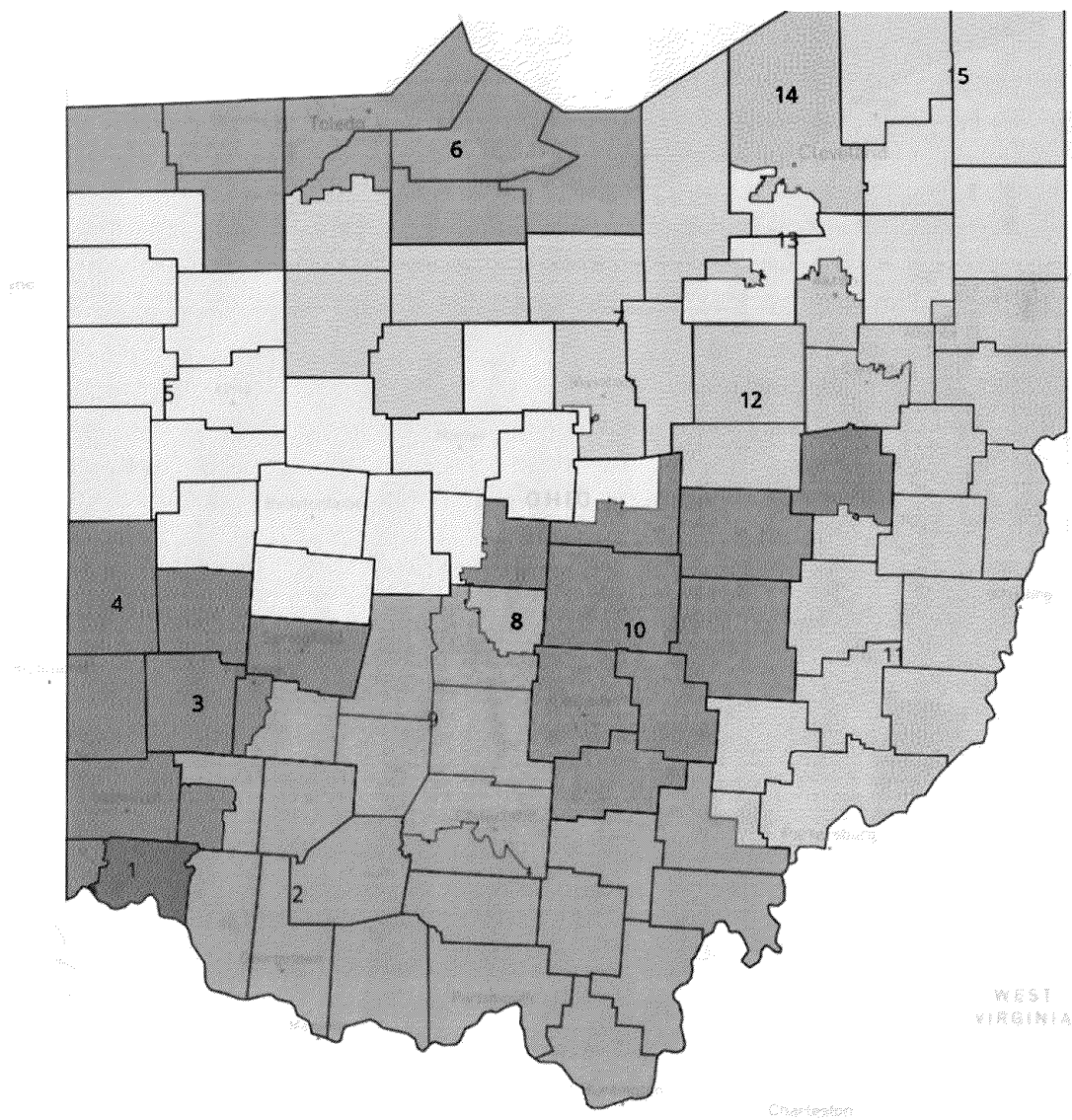
davesredistricting.org

Best,  
Emily

---

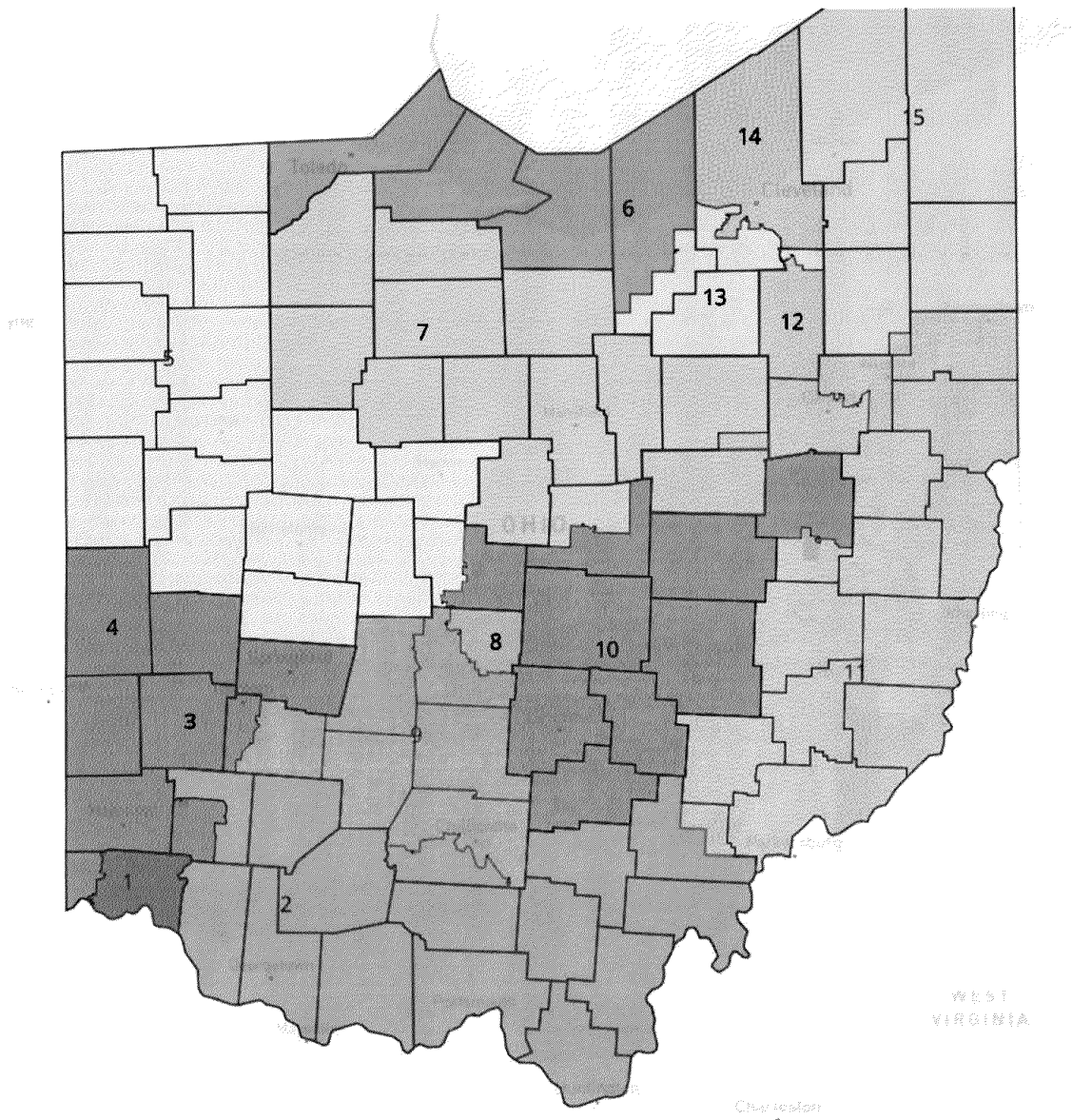
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# **Neiman Petitioners' Exhibit 48**



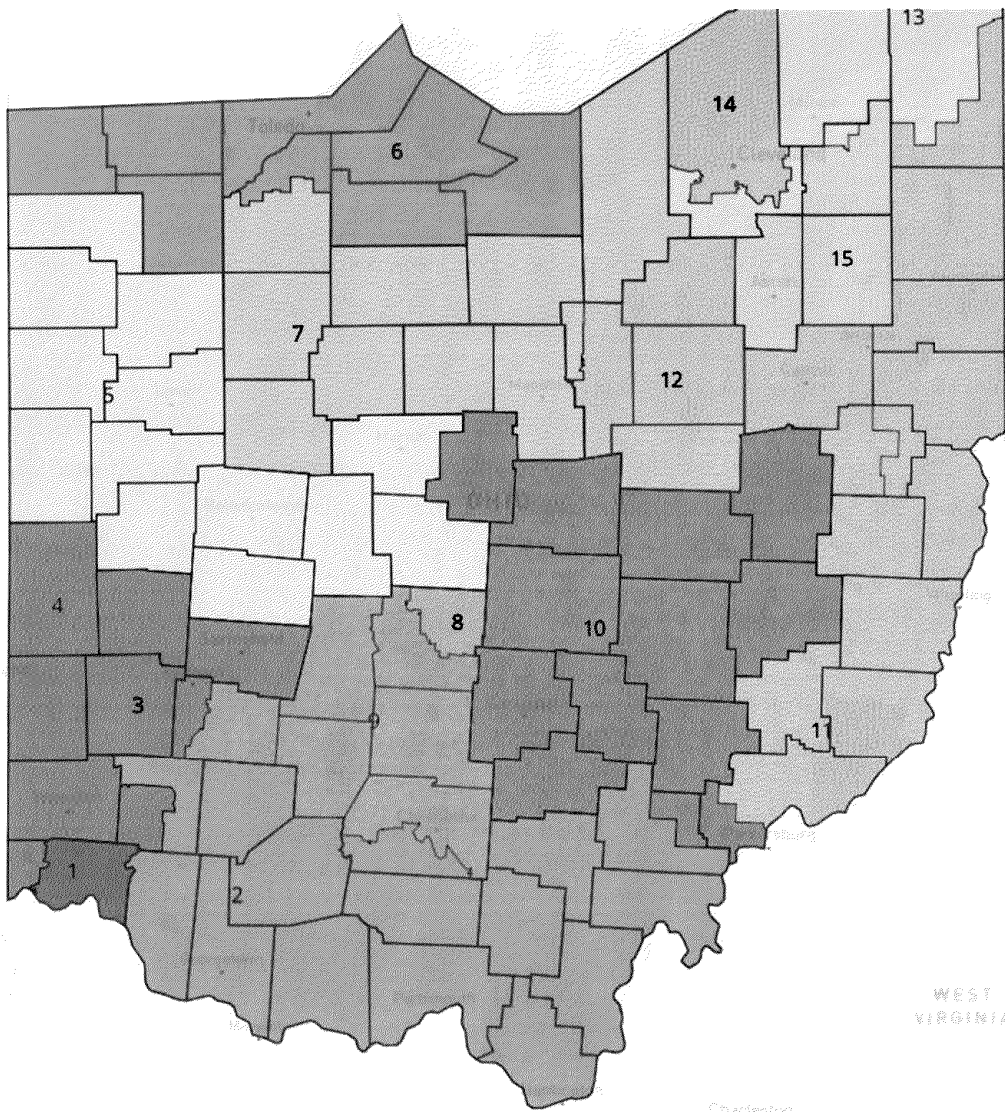
Districts 02/23/22





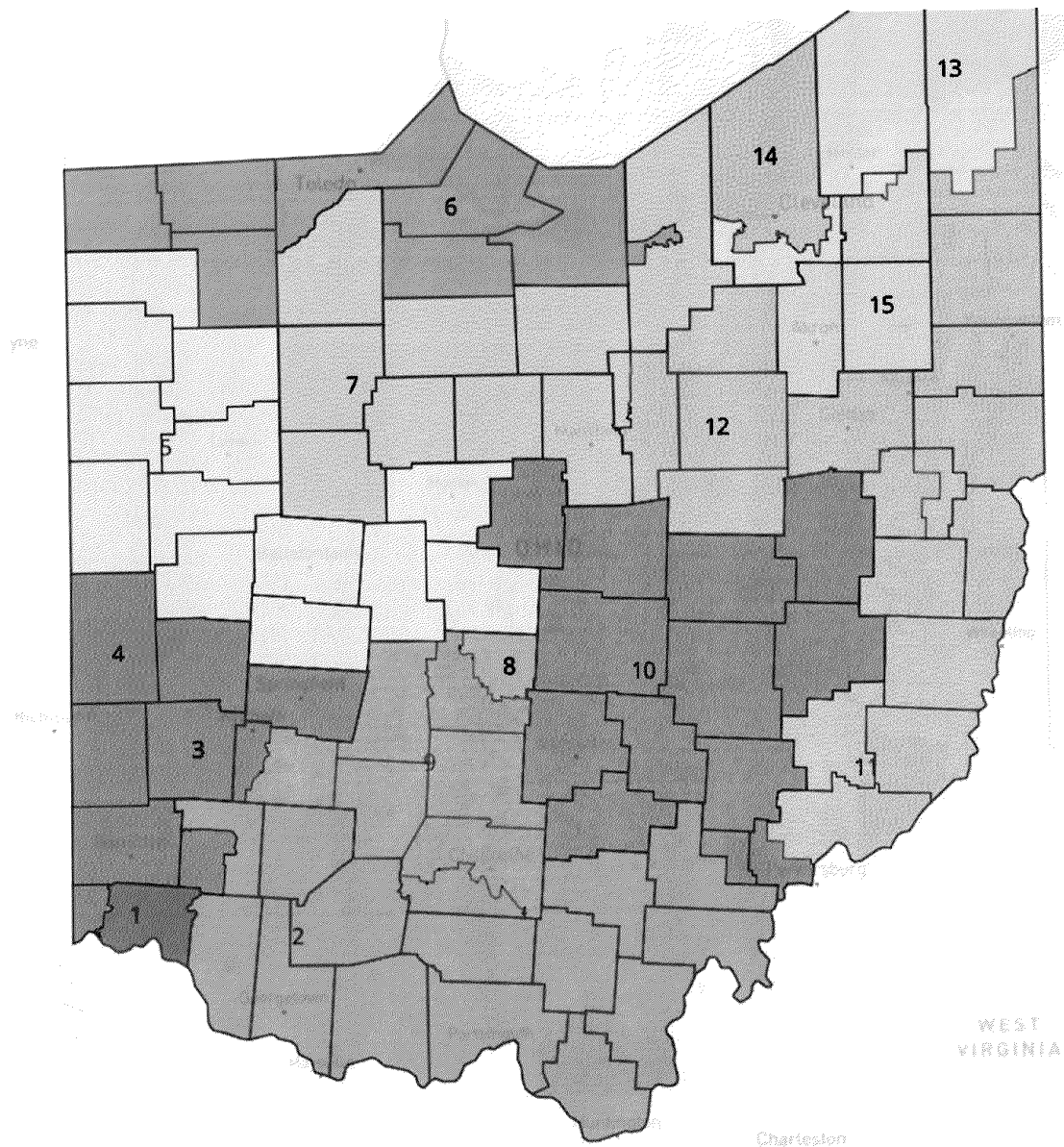
Districts 02/22/22





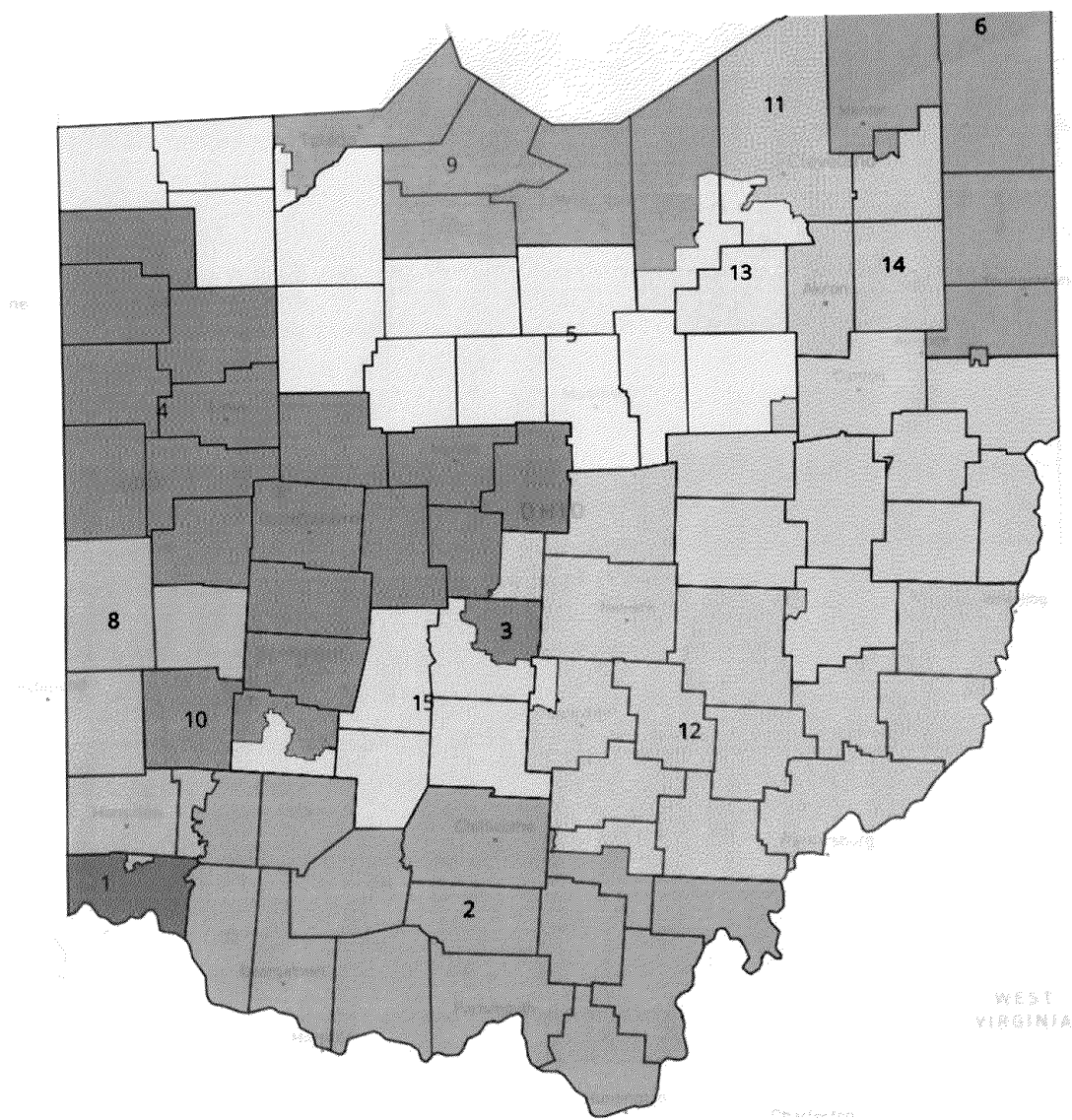
Districts 02/24/22





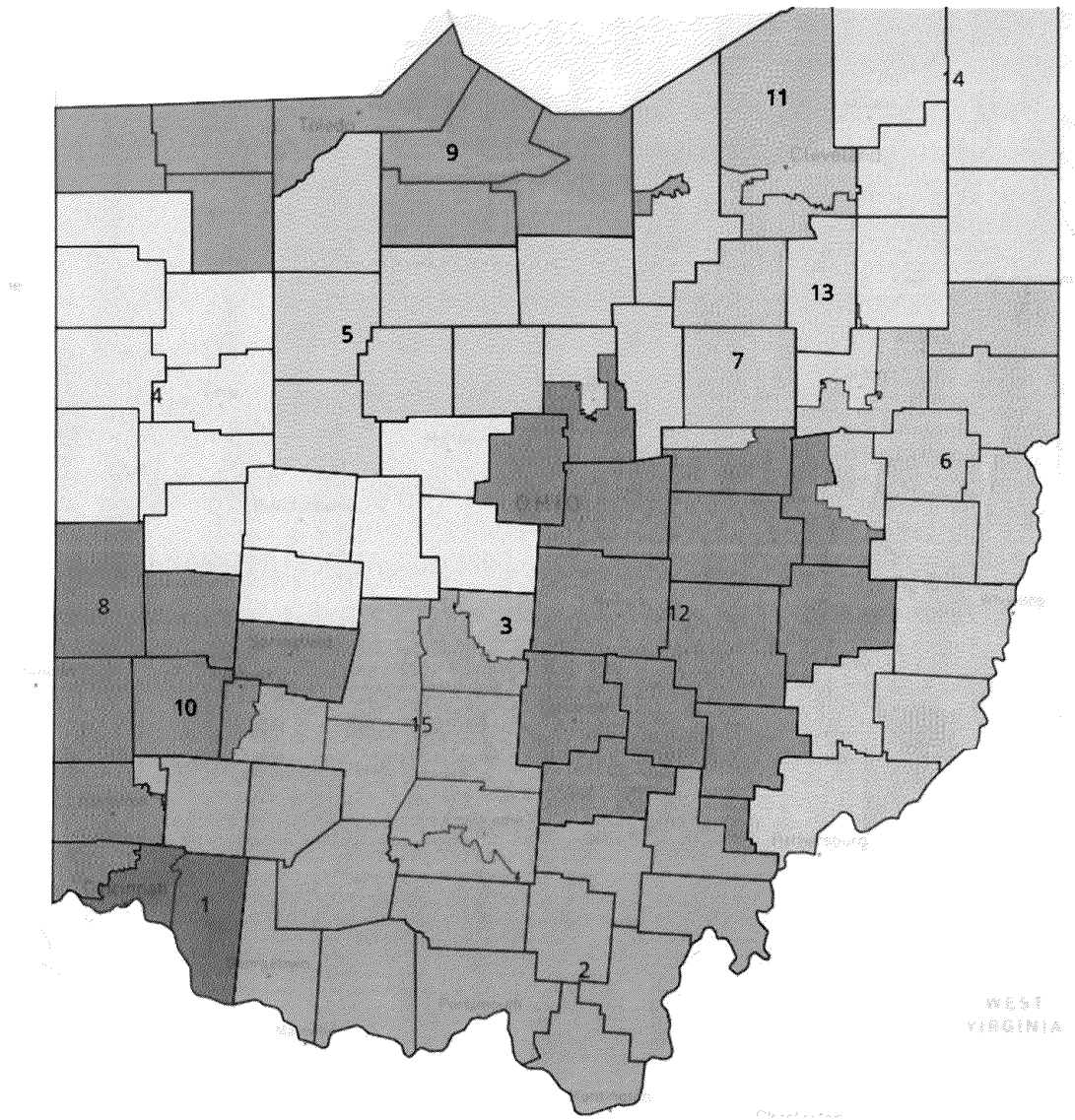
Districts 02/28/22





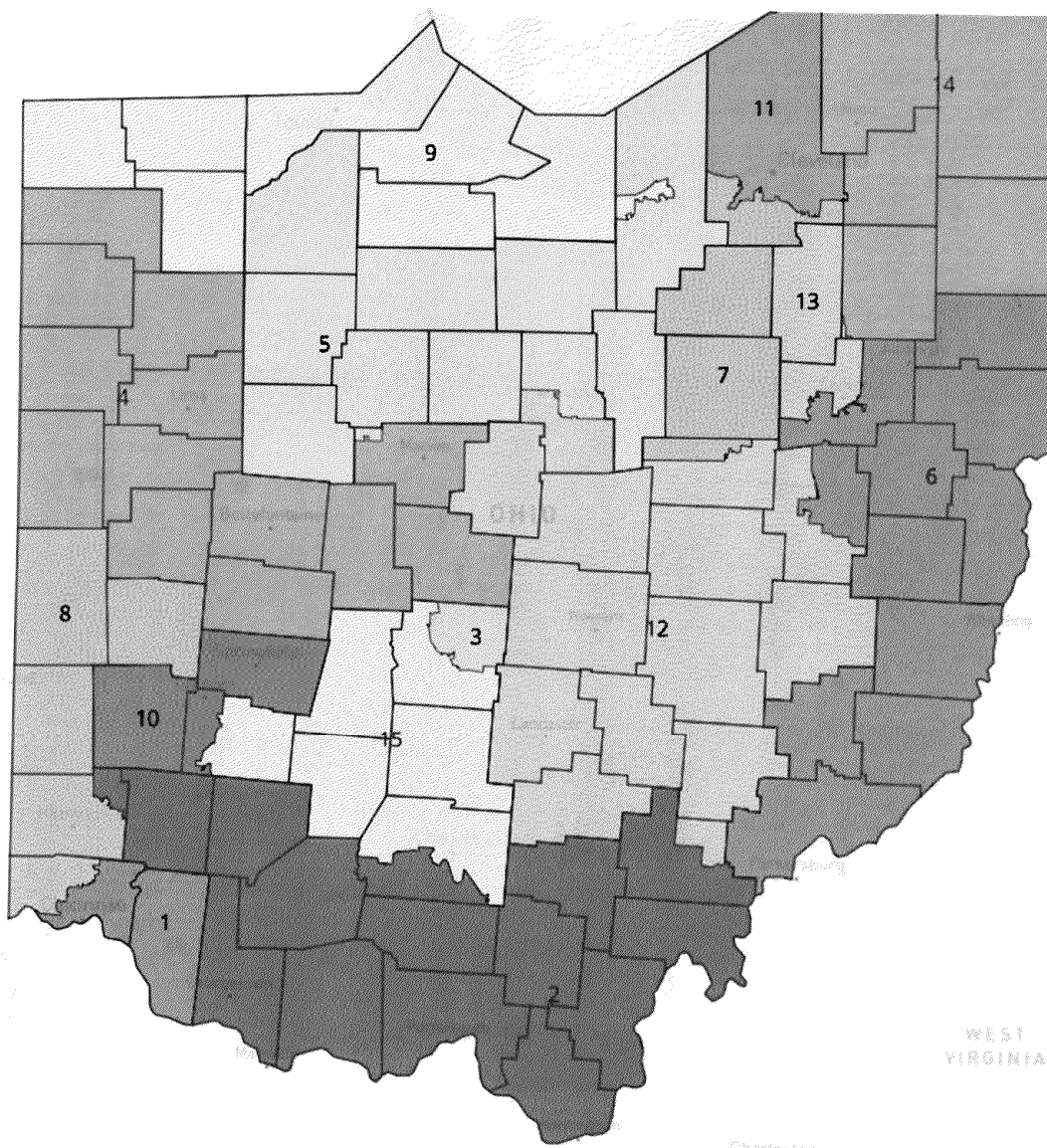
Districts 3/1/22





Update 03.01.22





Faber CD BAF March 1

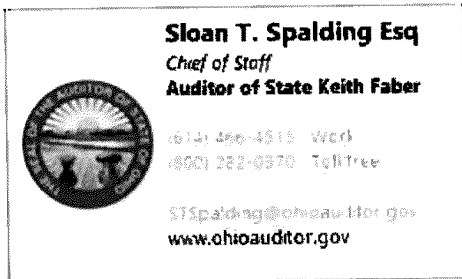
# **Neiman Petitioners' Exhibit 49**

**Keith L. Faber**

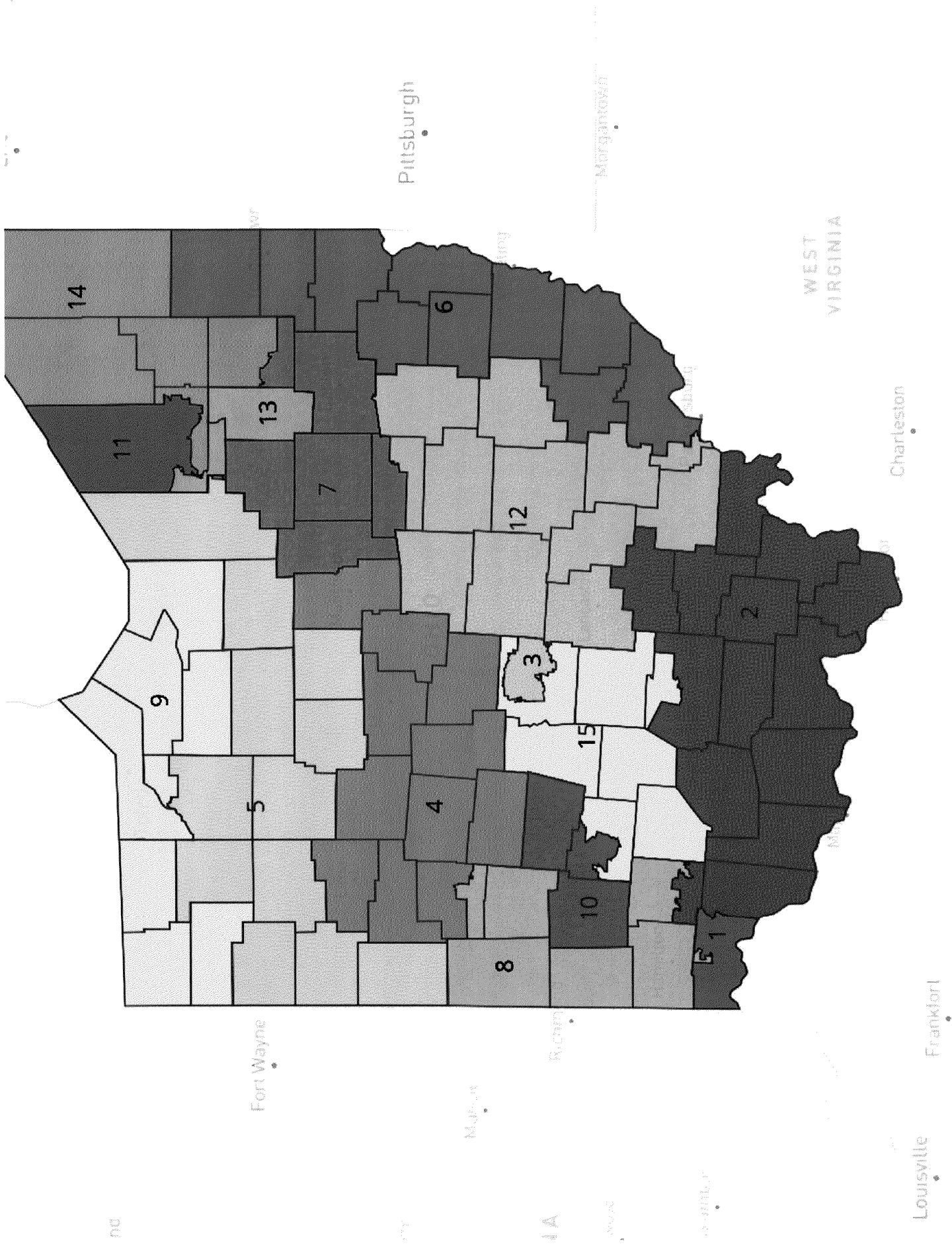
---

**From:** Sloan T. Spalding  
**Sent:** Monday, February 21, 2022 4:56 PM  
**To:** Keith L. Faber  
**Subject:** Congressional maps  
**Attachments:** R congressional plan - 21 FEB 2022.png; district-statistics (Rs Congressional).csv; Population.docx

Here is the proposed map, with the data.


























ID	Total Pop	Deviation	Dem	Rep	Oth	Total VAP	White	Minority	Hispanic	Black	Asian	Native	Pacific
Un	0	0	0	0	0	0	0	0	0	0	0	0	0
1	786630	0	0	0.5237	0.4537	0.0225	612636	0.6775	0.0337	0.2346	0.0366	0.0165	0.0014
2	786630	0	0	0.3032	0.674	0.0229	604474	0.9083	0.0146	0.0241	0.0255	0.0218	0.0009
3	786630	0	0	0.6857	0.2917	0.0225	612600	0.5782	0.0592	0.284	0.0643	0.0182	0.0015
4	786630	0	0	0.3161	0.659	0.0249	598377	0.8649	0.021	0.0581	0.0334	0.0176	0.0009
5	786630	0	0	0.3713	0.5994	0.0293	612187	0.8604	0.0602	0.0471	0.0124	0.0182	0.0015
6	786629	0	0	0.4183	0.5581	0.0236	630924	0.8629	0.024	0.0822	0.0081	0.0178	0.0008
7	786630	0	0	0.3739	0.5995	0.0267	611741	0.8925	0.0201	0.0492	0.0121	0.0194	0.0009
8	786630	0	0	0.3198	0.657	0.0231	601488	0.8179	0.0368	0.0894	0.0327	0.0201	0.0014
9	786630	0	0	0.4866	0.4851	0.0283	613653	0.777	0.0588	0.1263	0.0172	0.0196	0.0008
10	786630	0	0	0.4546	0.5205	0.0249	615743	0.7367	0.0319	0.1788	0.0293	0.022	0.0016
11	786630	0	0	0.7841	0.1957	0.0202	622217	0.444	0.071	0.4429	0.0357	0.0151	0.0013
12	786629	0	0	0.3499	0.6245	0.0256	607820	0.8994	0.0172	0.0415	0.0161	0.0216	0.0008
13	786630	0	0	0.5165	0.4607	0.0228	625958	0.8035	0.0225	0.1099	0.0434	0.016	0.0008
14	786630	0	0	0.4479	0.5268	0.0252	632794	0.8651	0.0322	0.0537	0.0273	0.0159	0.0008
15	786630	0	0	0.4452	0.5312	0.0236	604950	0.7772	0.044	0.1093	0.0481	0.0199	0.0011
Summary	786629	0	0	0.4525	0.5231	0.0244	613837	0.784	0.0365	0.1291	0.0294	0.0186	0.0011



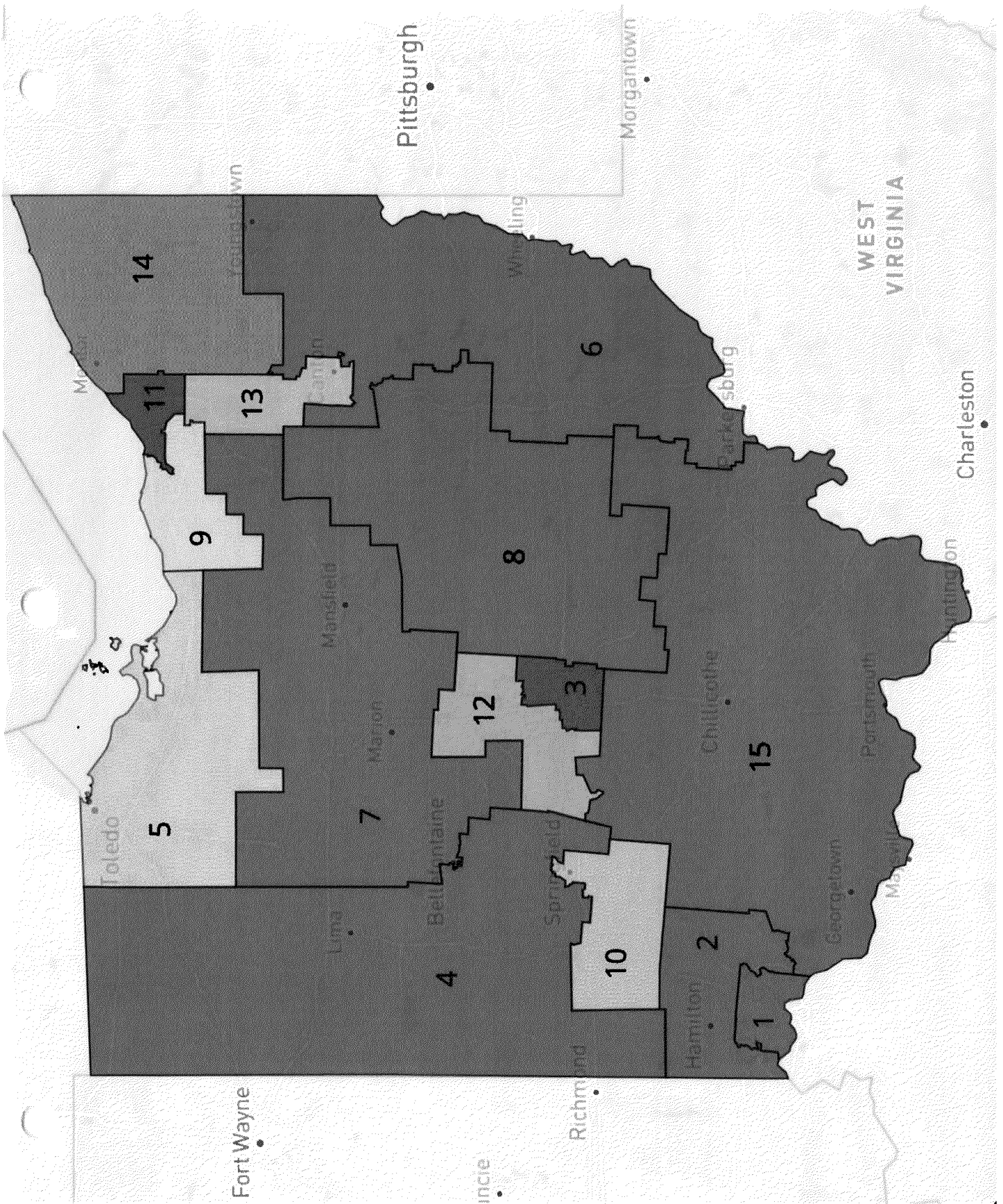
Population			Shapes	Partisan Lean			Demographics (VAP)DOWI	
ID	Total	+/-		Dem	Rep	Oth	Total	White
11	786,630	0.00%		78.41%	19.57%	2.02%	622,217	44.40%
3	786,630	0.00%		68.57%	29.17%	2.25%	612,600	57.82%
1	786,630	0.00%		52.37%	45.37%	2.25%	612,636	67.75%
13	786,630	0.00%		51.65%	46.07%	2.28%	625,958	80.35%
9	786,630	0.00%		48.66%	48.51%	2.83%	613,653	77.70%
10	786,630	0.00%		45.46%	52.05%	2.49%	615,743	73.67%
14	786,630	0.00%		44.79%	52.68%	2.52%	632,794	86.51%
15	786,630	0.00%		44.52%	53.12%	2.36%	604,950	77.72%
6	786,629	0.00%		41.83%	55.81%	2.36%	630,924	86.29%
7	786,630	0.00%		37.39%	59.95%	2.67%	611,741	89.25%
5	786,630	0.00%		37.13%	59.94%	2.93%	612,187	86.04%
12	786,629	0.00%		34.99%	62.45%	2.56%	607,820	89.94%
8	786,630	0.00%		31.98%	65.70%	2.31%	601,488	81.79%
4	786,630	0.00%		31.61%	65.90%	2.49%	598,377	86.49%
2	786,630	0.00%		30.32%	67.40%	2.29%	604,474	90.83%
Un	0			0.00%	0.00%	0.00%	0	0.00%
	<b>786,629</b>	<b>0.00%</b>		<b>45.25%</b>	<b>52.31%</b>	<b>2.44%</b>	<b>613,837</b>	<b>78.40%</b>

#### Notes

Seven districts lean Republican, two lean Democratic, and six fall in the 45–55% competitive range.

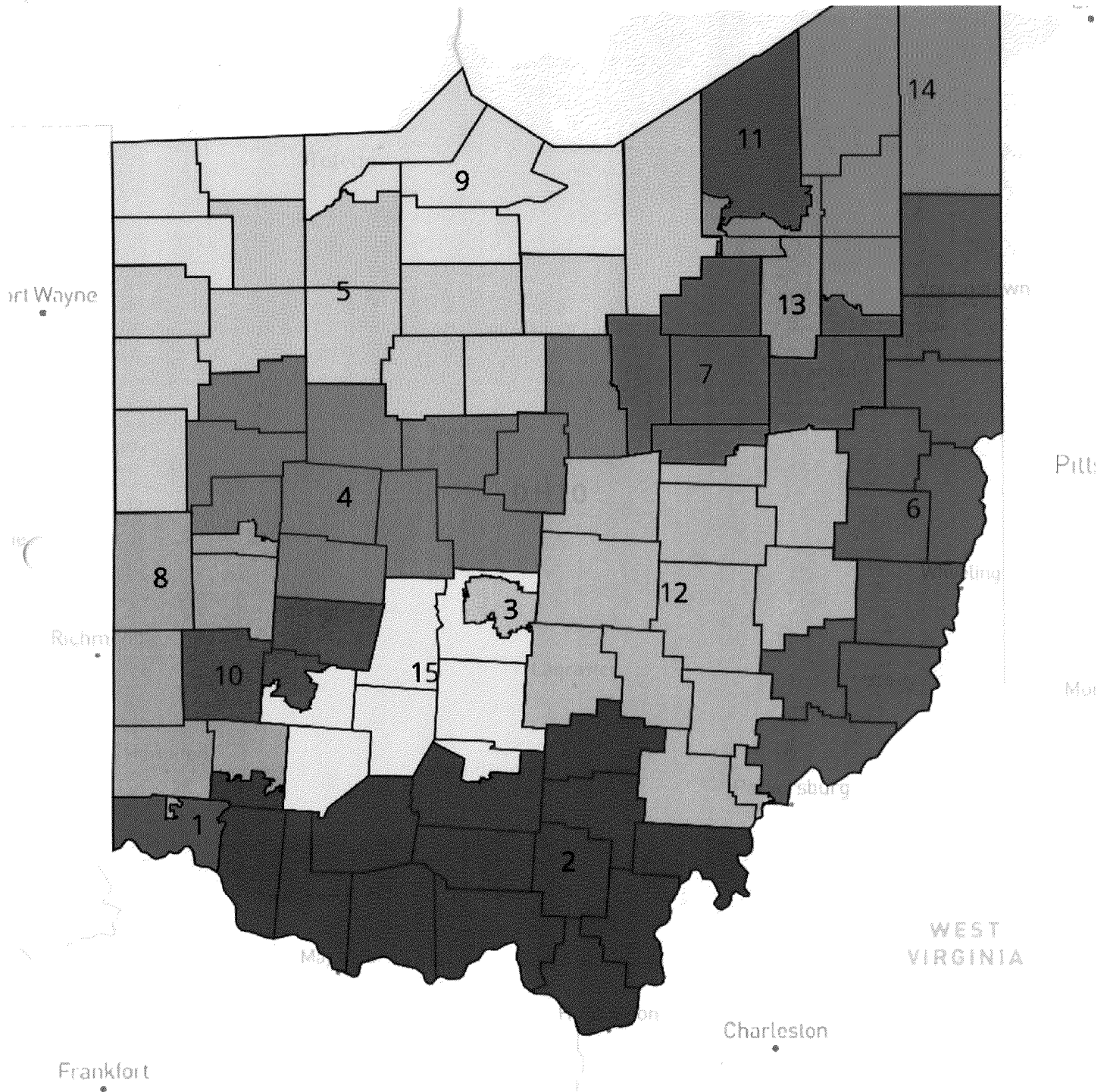
There is one majority-minority district

# **Neiman Petitioners' Exhibit 50**





# **Neiman Petitioners' Exhibit 51**



Huffman proposed map Feb 21, 2022



Population			Shapes	Partisan Lean			Demographics (VAP)DOW	
ID	Total	+/-		Dem	Rep	Oth	Total	White
11	786,630	0.00%		78.41%	19.57%	2.02%	622,217	44.40%
3	786,630	0.00%		68.57%	29.17%	2.25%	612,600	57.82%
1	786,630	0.00%		52.37%	45.37%	2.25%	612,636	67.75%
13	786,630	0.00%		51.65%	46.07%	2.28%	625,958	80.35%
9	786,630	0.00%		48.66%	48.51%	2.83%	613,653	77.70%
10	786,630	0.00%		45.46%	52.05%	2.49%	615,743	73.67%
14	786,630	0.00%		44.79%	52.68%	2.52%	632,794	86.51%
15	786,630	0.00%		44.52%	53.12%	2.36%	604,950	77.72%
6	786,629	0.00%		41.83%	55.81%	2.36%	630,924	86.29%
7	786,630	0.00%		37.39%	59.95%	2.67%	611,741	89.25%
5	786,630	0.00%		37.13%	59.94%	2.93%	612,187	86.04%
12	786,629	0.00%		34.99%	62.45%	2.56%	607,820	89.94%
8	786,630	0.00%		31.98%	65.70%	2.31%	601,488	81.79%
4	786,630	0.00%		31.61%	65.90%	2.49%	598,377	86.49%
2	786,630	0.00%		30.32%	67.40%	2.29%	604,474	90.83%
Un	0			0.00%	0.00%	0.00%	0	0.00%
	<b>786,629</b>	<b>0.00%</b>		<b>45.25%</b>	<b>52.31%</b>	<b>2.44%</b>	<b>613,837</b>	<b>78.40%</b>

#### Notes

Seven districts lean Republican, two lean Democratic, and six fall in the 45–55% competitive range.

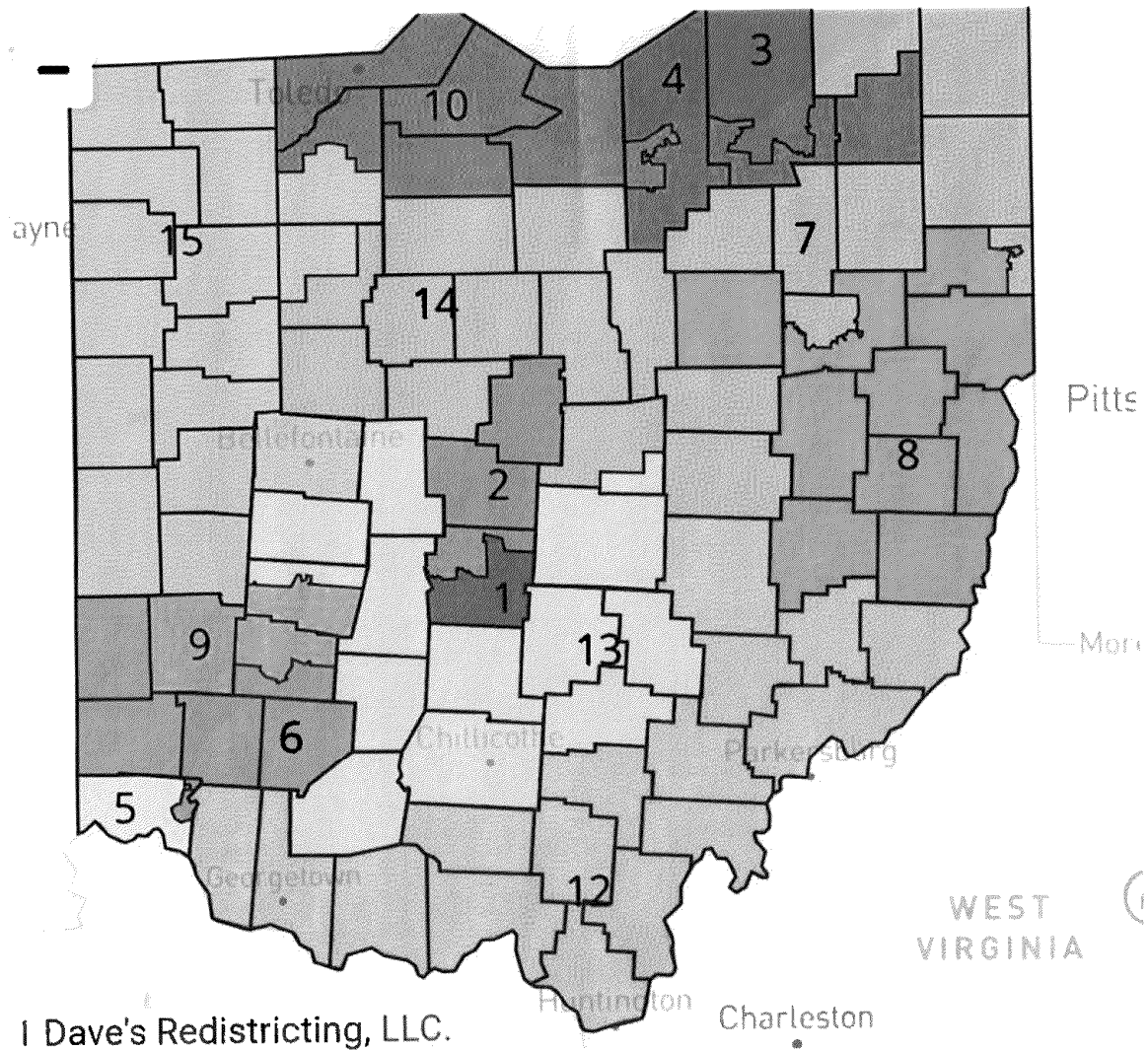
There is one majority-minority district



ID	Total Pop	Devation	Dem	Rep	Oth	Total VAP	White	Minority
Un	0	0	0	0	0	0	0	0
1	786630	0	0.5237	0.4537	0.0225	612636	0.6775	0.3225
2	786630	0	0.3032	0.674	0.0229	604474	0.9083	0.0917
3	786630	0	0.6857	0.2917	0.0225	612600	0.5782	0.4218
4	786630	0	0.3161	0.659	0.0249	598377	0.8649	0.1351
5	786630	0	0.3713	0.5994	0.0293	612187	0.8604	0.1396
6	786629	0	0.4183	0.5581	0.0236	630924	0.8629	0.1371
7	786630	0	0.3739	0.5995	0.0267	611741	0.8925	0.1075
8	786630	0	0.3198	0.657	0.0231	601488	0.8179	0.1821
9	786630	0	0.4866	0.4851	0.0283	613653	0.777	0.223
10	786630	0	0.4546	0.5205	0.0249	615743	0.7367	0.2633
11	786630	0	0.7841	0.1957	0.0202	622217	0.444	0.556
12	786629	0	0.3499	0.6245	0.0256	607820	0.8994	0.1006
13	786630	0	0.5165	0.4607	0.0228	625958	0.8035	0.1965
14	786630	0	0.4479	0.5268	0.0252	632794	0.8651	0.1349
15	786630	0	0.4452	0.5312	0.0236	604950	0.7772	0.2228
Summary	786629	0	0.4525	0.5231	0.0244	613837	0.784	0.216

# **Neiman Petitioners' Exhibit 52**

Yuko/Sykes Map



# **Neiman Petitioners' Exhibit 53**

**Archived:** Monday, April 18, 2022 10:46:23 PM  
**From:** [Blake.Springhetti@ohiohouse.gov](mailto:Blake.Springhetti@ohiohouse.gov)  
**Sent:** Wednesday, March 2, 2022 6:33:24 AM  
**To:** [Bob Cupp](#)  
**Subject:** Re: Auditor Faber Email map idea  
**Sensitivity:** Normal  
**Attachments:**  
[Blocks 03.01.xlsx](#) ;

---

This is the first I'm seeing it as well.

On Mar 1, 2022, at 10:41 PM, Bob Cupp <[rcupp@bright.net](mailto:rcupp@bright.net)> wrote:

Blake – Have you seen this idea from Auditor Faber? I just received it tonight. Any thoughts.

Bob

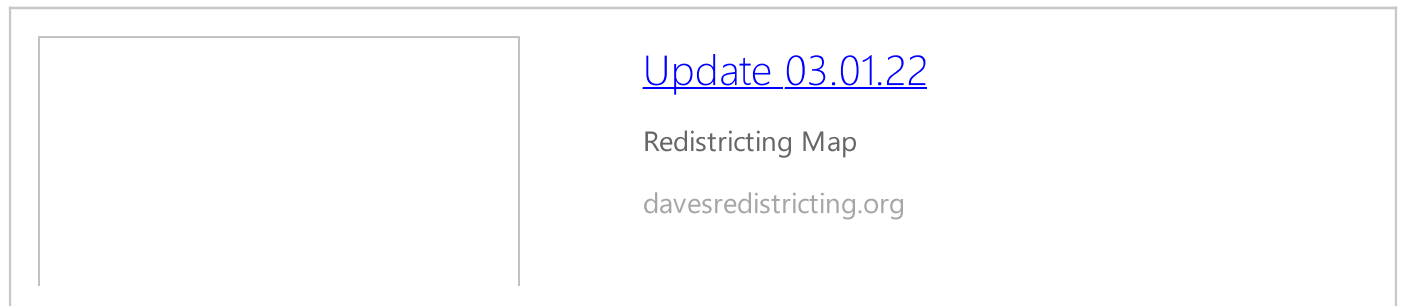
---

**From:** Emily Redman <[EERedman@ohioauditor.gov](mailto:EERedman@ohioauditor.gov)>  
**Sent:** Tuesday, March 1, 2022 9:55 PM  
**To:** [bob.cupp@ohiohouse.gov](mailto:bob.cupp@ohiohouse.gov); [rcupp@bright.net](mailto:rcupp@bright.net)  
**Cc:** [Blake.Springhetti@ohiohouse.gov](mailto:Blake.Springhetti@ohiohouse.gov)  
**Subject:** Auditor Faber Email

Speaker Cupp -

Auditor Faber ask that I pass along the link to a draft on Dave's and the accompanying BAF attached. We acknowledge there would be some necessary cleaning up to finalize the districts, but you can see what I believe he has discussed with you as potential changes.

<https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>



Best,  
Emily Redman

---

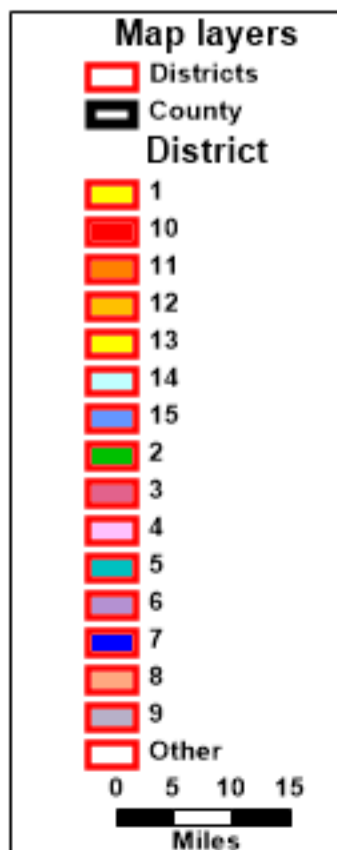
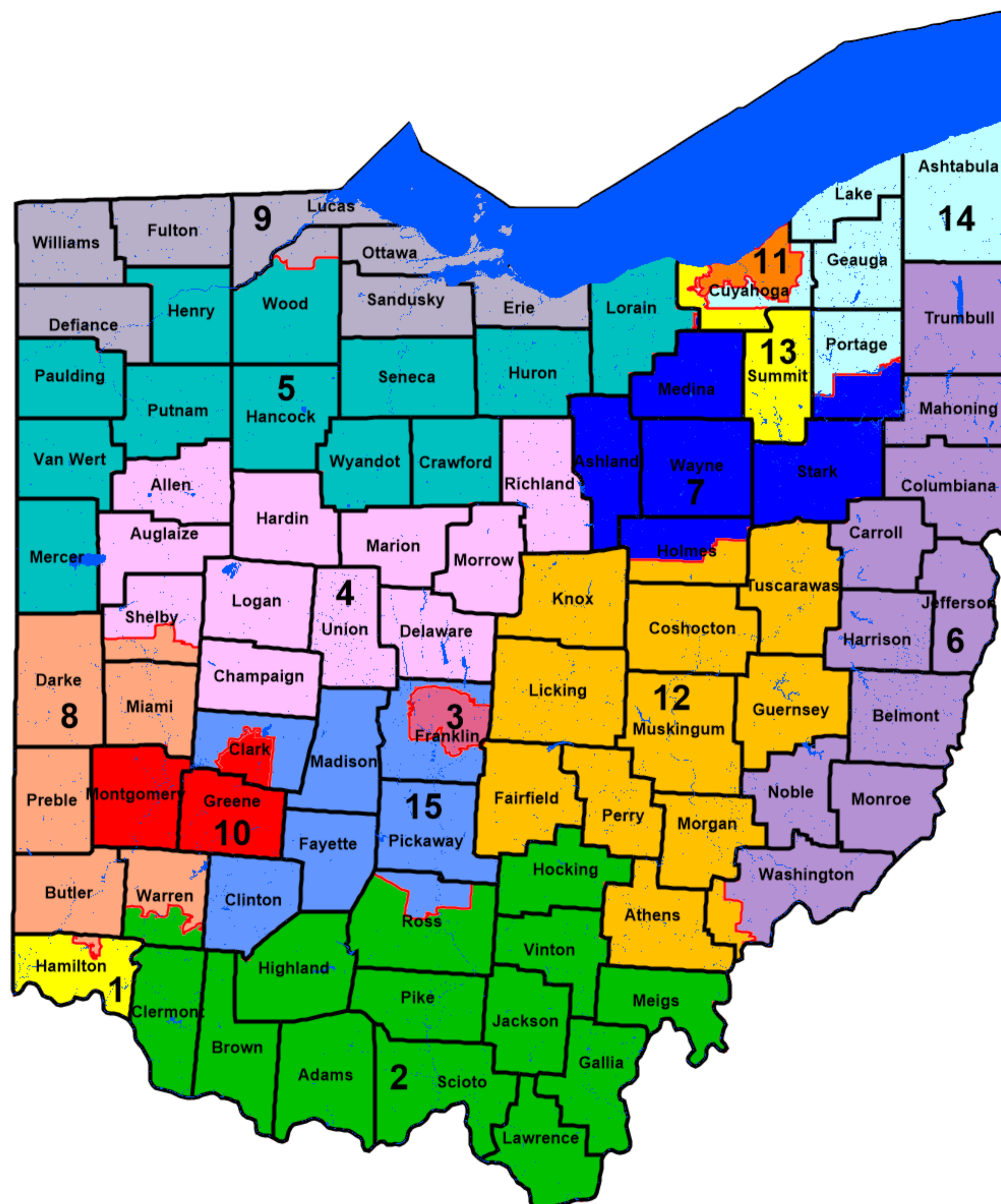


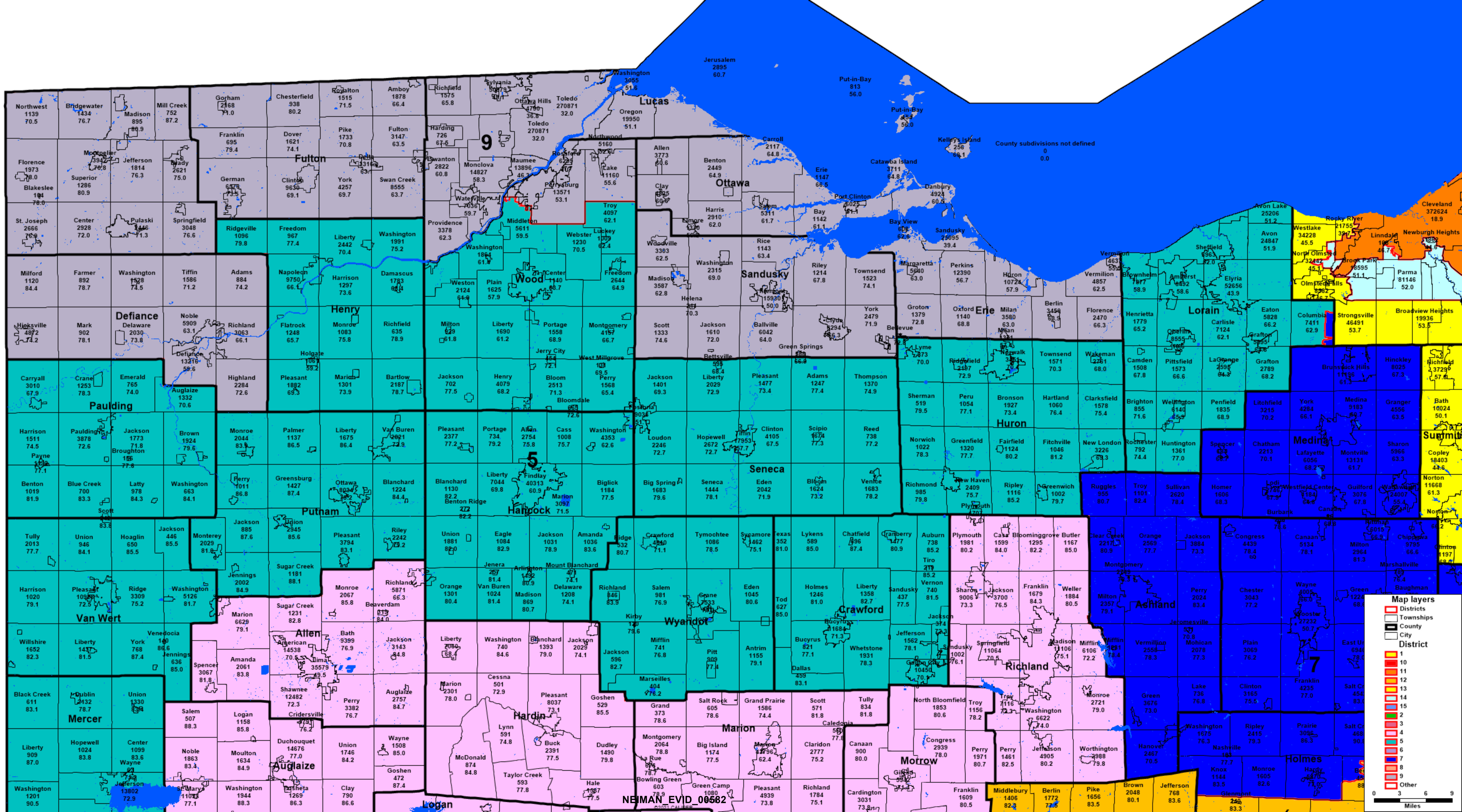
# **Neiman Petitioners' Exhibit 54**

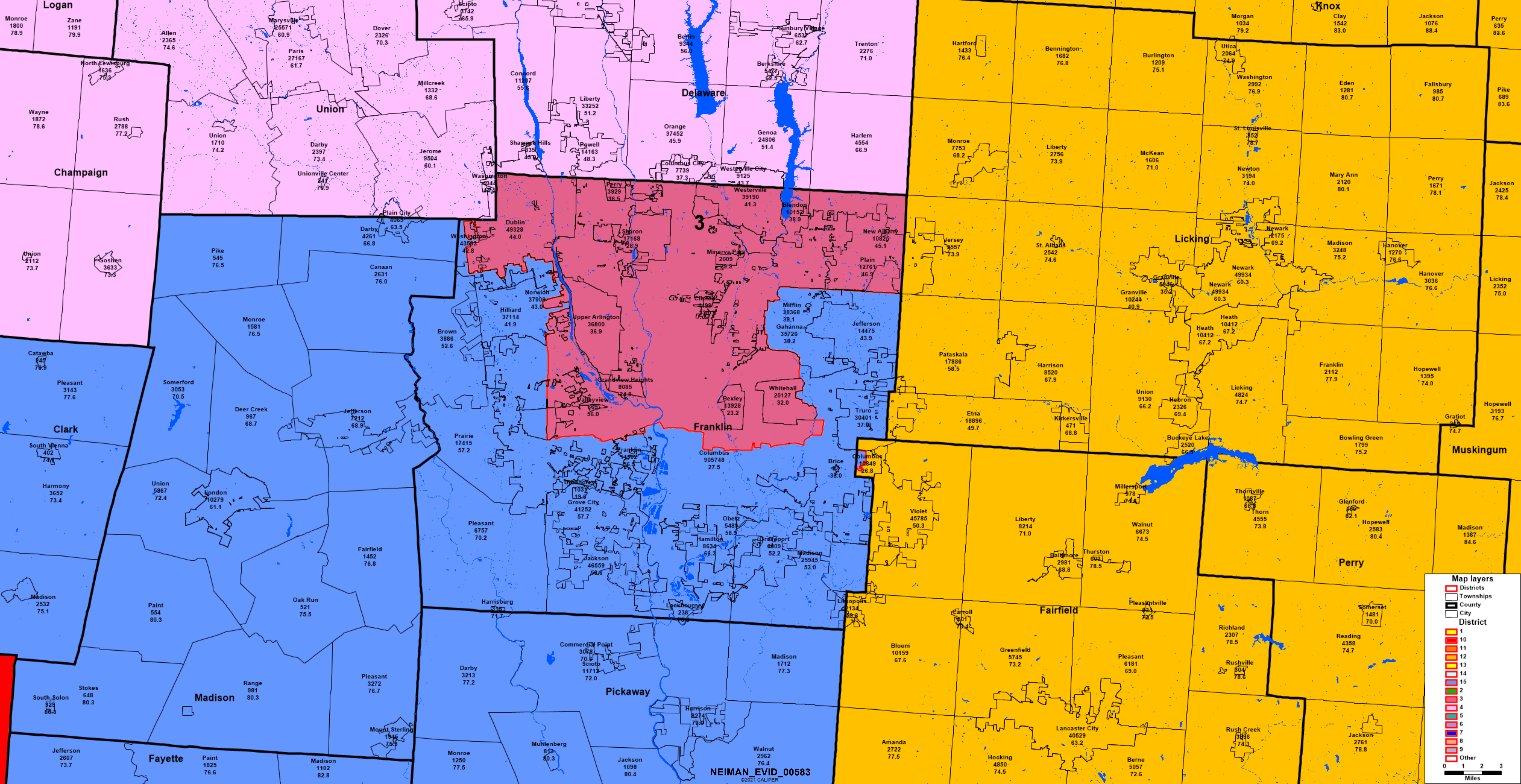
**Archived:** Monday, April 18, 2022 10:37:15 PM  
**From:** [Blake.Springhetti@ohiohouse.gov](mailto:Blake.Springhetti@ohiohouse.gov)  
**Sent:** Wednesday, February 2, 2022 3:21:43 PM  
**To:** '[rcupp@bright.net](mailto:rcupp@bright.net)'; '[djswear12@gmail.com](mailto:djswear12@gmail.com)'; [Christine.Morrison@ohiohouse.gov](mailto:Christine.Morrison@ohiohouse.gov)  
**Subject:** Proposed Plan Information  
**Sensitivity:** Normal  
**Attachments:**  
[Proposed Plan Article XIX.zip](#) ;

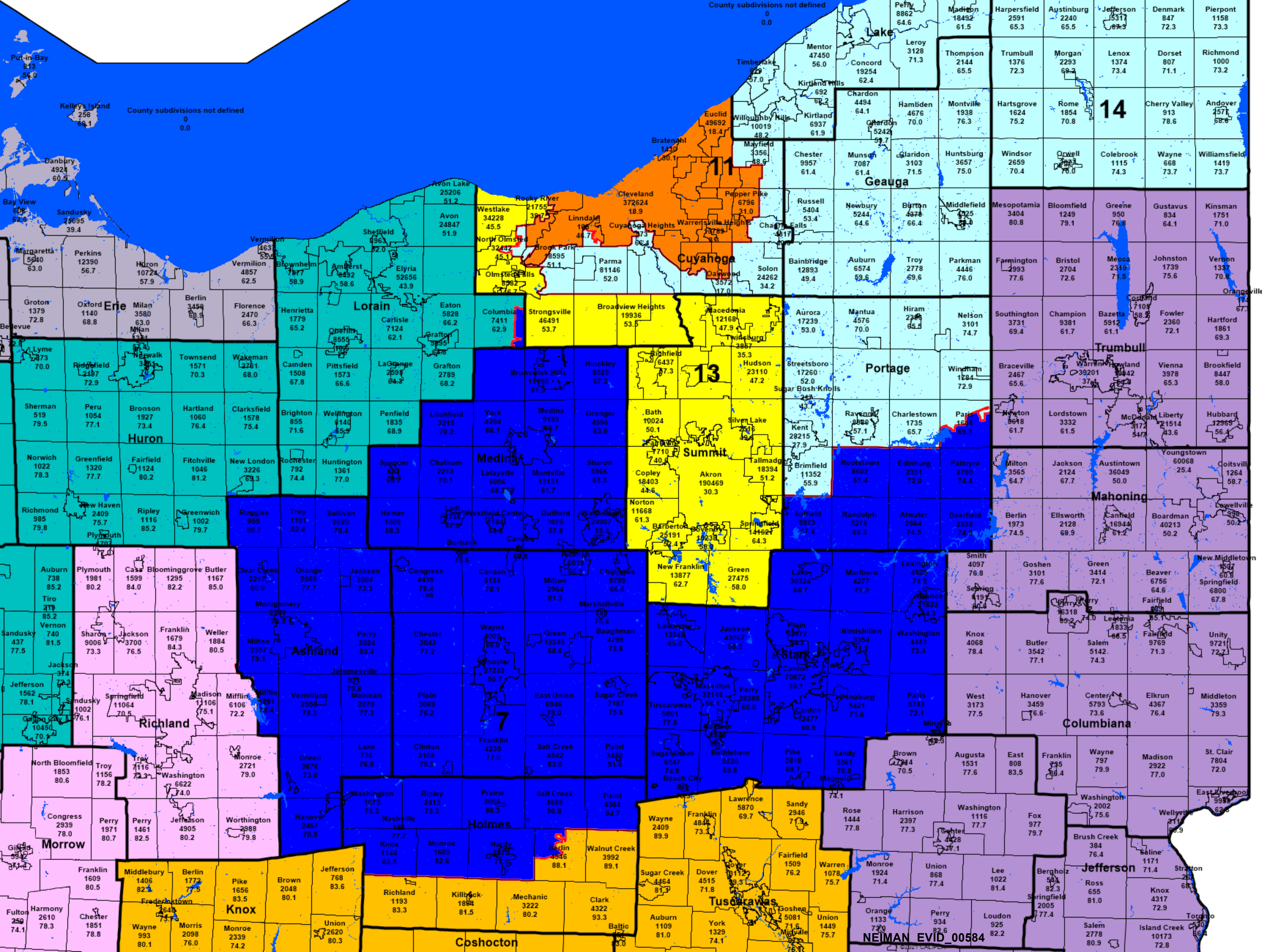
---

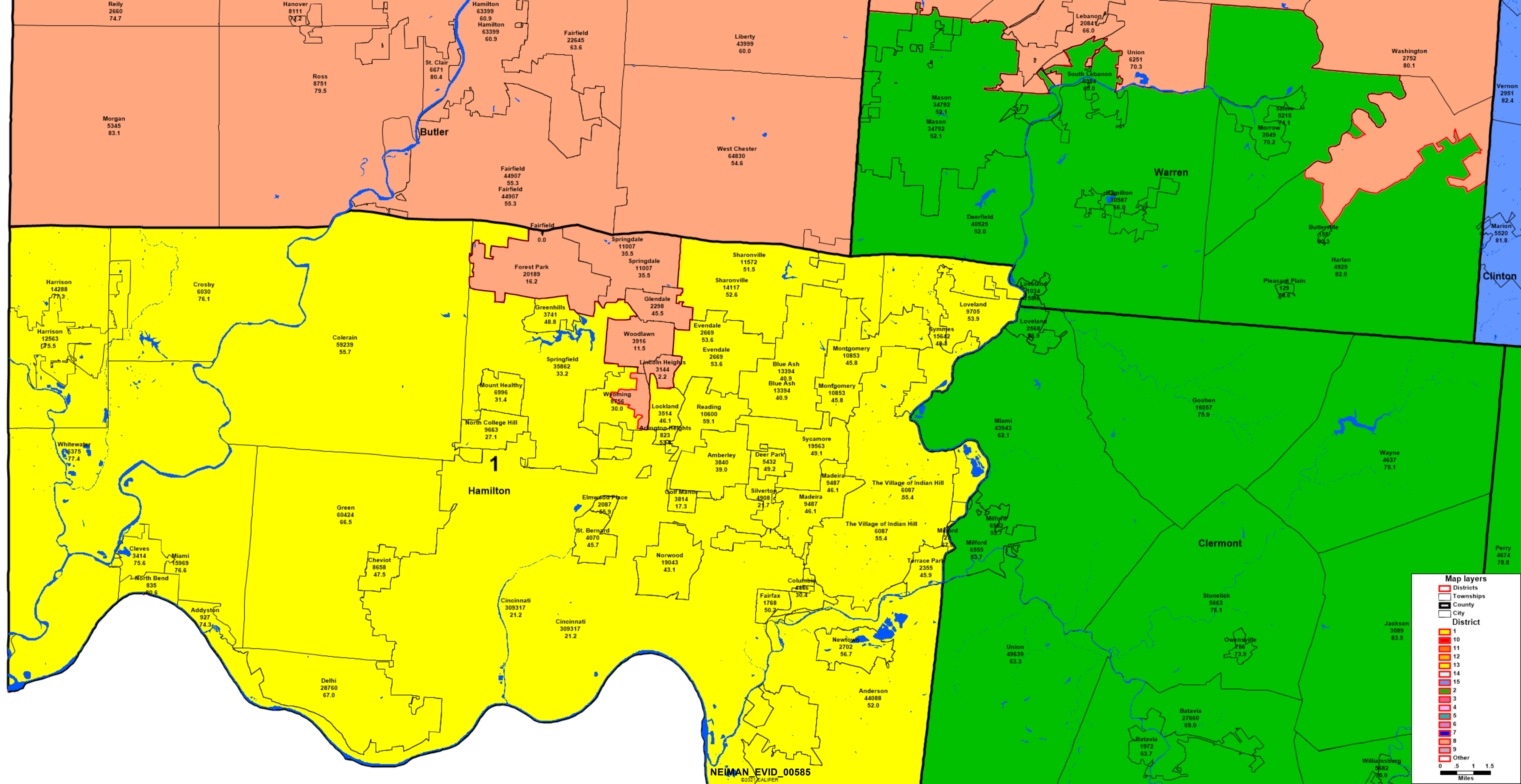
Hello all,  
Please see the attached images.  
Blake











# **Neiman Petitioners' Exhibit 55**

**To:** Routt, Randall[Randall.Routt@ohiosenate.gov];  
'chris@projectgovern.com'[chris@projectgovern.com];  
'Sarah.Cherry@ohiohouse.gov'[Sarah.Cherry@ohiohouse.gov]  
**Cc:** Blake.Springhetti@ohiohouse.gov[Blake.Springhetti@ohiohouse.gov]; 'Emily  
Redman'[EERedman@ohioauditor.gov]; Oliveti, Chris[coliveti@OhioSOS.Gov]; Aaron Crooks  
(aaron.crooks@governor.ohio.gov)[aaron.crooks@governor.ohio.gov]  
**From:** DiRossi, Ray  
**Sent:** Tue 3/1/2022 5:11:21 PM  
**Subject:** CD BAF  
[March 1 2022 CD BAF.xlsx](#)

All

Attached is a CD BAF that will be presented to the Commission this afternoon  
Senator Sykes requested that any such proposal be given to the Democrat staff and Democrat Commission  
members prior to the hearing

Since this is being made available before being made public, please do not share until the Commission  
meeting.

Let me know if you have any issues accessing the BAF

**Ray DiRossi**  
**Director of Finance and Budget**  
**Ohio Senate Majority Caucus**  
**Statehouse, Suite 205**  
**Columbus, Ohio 43215**



(O) 614.466.4947  
(C) 614.578.3848  
[ray.dirossi@ohiosenate.gov](mailto:ray.dirossi@ohiosenate.gov)

# **Neiman Petitioners' Exhibit 56**

**To:** Routt, Randall[Randall.Routt@ohiosenate.gov];  
'chris@projectgovern.com'[chris@projectgovern.com]; DiRossi, Ray[Ray.DiRossi@ohiosenate.gov];  
Blake.Springhetti@ohiohouse.gov[Blake.Springhetti@ohiohouse.gov]; 'Emily  
Redman'[EERedman@ohioauditor.gov]; Oliveti, Chris[coliveti@OhioSOS.Gov];  
'Aaron.Crooks@governor.ohio.gov'[Aaron.Crooks@governor.ohio.gov]  
**From:** Sarah.Cherry@ohiohouse.gov  
**Sent:** Mon 2/28/2022 3:10:29 PM  
**Subject:** Meetings on congressional map

All,

Good morning. Randall and Chris and I met with Ray and Blake yesterday to talk about a congressional map redraw. Perhaps some of you did as well. When we (Dem Caucus staff) tried to schedule a meeting of the staff of all 7 commissioners earlier in the week, only the Secretary and Auditor's staff were able to make it. Ray and Blake told us they had no map and don't know when a vote will take place or when a map will be produced or what any area of the state will look like in the next map they produce. We asked for the map to be made available 24 hours before any vote and for there to be 24 hours notice of a Commission vote as well. We remain available, as do Leader Sykes and Sen. Sykes, to meet about a congressional map. We continue to invite any feedback or discussion of the Democratic congressional map versions that have been available on the Commission site since [Nov. 10](#) and [Feb. 8](#).

Thank you.

***Sarah A. Cherry***

*Legal Counsel, Minority Caucus*  
*she/her/hers*  
Ohio House of Representatives  
77 South High Street, 14th Floor  
Columbus, OH 43215  
office: (614) 466-6040  
[sarah.cherry@ohiohouse.gov](mailto:sarah.cherry@ohiohouse.gov)

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# **Neiman Petitioners' Exhibit 57**

**To:** Routt, Randall[Randall.Routt@ohiosenate.gov];  
'Blake.Springhetti@ohiohouse.gov'[Blake.Springhetti@ohiohouse.gov]  
**Cc:** eeredman@ohioauditor.gov[eeredman@ohioauditor.gov];  
Sarah.Cherry@ohiohouse.gov[Sarah.Cherry@ohiohouse.gov]; coliveti@ohiosos.gov[coliveti@ohiosos.gov];  
Aaron.Crooks@governor.ohio.gov[Aaron.Crooks@governor.ohio.gov];  
chris@projectgovern.com[chris@projectgovern.com]  
**From:** DiRossi, Ray  
**Sent:** Wed 2/23/2022 2:52:00 PM  
**Subject:** RE: Congressional map drawing discussion meeting

hey all  
Im booked solid today  
sorry for the delay in response  
Ray

---

**From:** Routt, Randall  
**Sent:** Wednesday, February 23, 2022 9:30 AM  
**To:** 'Blake.Springhetti@ohiohouse.gov'  
**Cc:** DiRossi, Ray; eeredman@ohioauditor.gov; Sarah.Cherry@ohiohouse.gov; coliveti@ohiosos.gov;  
Aaron.Crooks@governor.ohio.gov; chris@projectgovern.com  
**Subject:** RE: Congressional map drawing discussion meeting

Okay. We will be in the Minority Conference Room at 11:00 a.m. for whoever can attend and wants to get to work on a congressional map.

Thanks,

Randall

---

**From:** Blake.Springhetti@ohiohouse.gov <Blake.Springhetti@ohiohouse.gov>  
**Sent:** Wednesday, February 23, 2022 8:14 AM  
**To:** Routt, Randall <Randall.Routt@ohiosenate.gov>  
**Cc:** DiRossi, Ray <Ray.DiRossi@ohiosenate.gov>; eeredman@ohioauditor.gov; Sarah.Cherry@ohiohouse.gov;  
coliveti@ohiosos.gov; Aaron.Crooks@governor.ohio.gov; chris@projectgovern.com  
**Subject:** Re: Congressional map drawing discussion meeting

Good morning,  
Just seeing this email chain, apologies for a delayed response. Unfortunately, my schedule is jammed up today and I cannot make the 11a meeting.  
Blake

On Feb 22, 2022, at 8:06 PM, Routt, Randall <Randall.Routt@ohiosenate.gov> wrote:

?  
Ray, Blake,

I've heard back from everyone else. How does 11:00 am in the Senate Minority Conference Room sound for an initial meet?

We can work out the particulars of moving forward from there. Let us know if the time works for you.

Randall

On Feb 22, 2022, at 4:31 PM, Routt, Randall <[Randall.Routt@ohiosenate.gov](mailto:Randall.Routt@ohiosenate.gov)> wrote:

?

Hello Everyone,

We, Senate and House Democratic staff, are available to meet to begin drawing a constitutionally compliant congressional map as soon as possible. We understand that the Speaker indicated to Sen. Sykes that he wanted to start with the map passed by the General Assembly and apply the Constitution and Court order from there. Let us know when you are available and who your designated staff person or map drawer is for working sessions. Please let us know if there are other map drawers that we should include in this invitation.

We are also available to work on state legislative maps.

Thanks,

Randall Routt  
Policy Advisor  
Senate Democratic Caucus  
614-466-6110

# **Neiman Petitioners' Exhibit 58**

**To:** Sarah.Cherry@ohiohouse.gov[Sarah.Cherry@ohiohouse.gov];  
Blake.Springhetti@ohiohouse.gov[Blake.Springhetti@ohiohouse.gov]  
**From:** DiRossi, Ray  
**Sent:** Sun 2/27/2022 2:32:47 AM  
**Subject:** RE: Leader Russo Congressional Districts Response

Sarah  
thanks for forwarding  
I hadn't seen the letter  
but i'll just say I find much of this disingenuous at best and leave it at that  
Ray

---

**From:** Sarah.Cherry@ohiohouse.gov [Sarah.Cherry@ohiohouse.gov]  
**Sent:** Saturday, February 26, 2022 8:04 PM  
**To:** DiRossi, Ray; Blake.Springhetti@ohiohouse.gov  
**Subject:** Fwd: Leader Russo Congressional Districts Response

Here it is attached.

Begin forwarded message:

**From:** "DiPalma, Andy" <Andy.DiPalma@ohiohouse.gov>  
**Date:** February 25, 2022 at 10:59:51 PM EST  
**To:** "Morrison, Christine" <Christine.Morrison@ohiohouse.gov>, "Barron, John"  
<John.Barron@ohiosenate.gov>  
**Cc:** "Huffman, Matt" <Matt.Huffman@ohiosenate.gov>, "Cupp, Bob"  
<Bob.Cupp@ohiohouse.gov>, "Strigari, Frank" <Frank.Strigari@ohiosenate.gov>,  
"Oliveti, Chris" <coliveti@ohiosos.gov>, Emily Redman <EERedman@ohioauditor.gov>,  
"Sloan T. Spalding" <STSpalding@ohioauditor.gov>, "Cherry, Sarah"  
<Sarah.Cherry@ohiohouse.gov>, Aaron.Crooks@governor.ohio.gov, "Boas, George"  
<George.Boas@ohiosenate.gov>, "Rothey, Kristin" <Kristin.Rothey@ohiosenate.gov>,  
"Stockman, Scott" <Scott.Stockman@ohiosenate.gov>, jmauk@ohiosos.gov, Matt  
Donahue <matthew.donahue@governor.ohio.gov>, Matt Grodhaus  
<mgrodhaus@ohiosos.gov>, "Routt, Randall" <Randall.Routt@ohiosenate.gov>, "Rowe,  
Mike" <Mike.Rowe@ohiosenate.gov>, Aaron.Crooks@governor.ohio.gov, "Disantis,  
Paul" <Paul.Disantis@ohiohouse.gov>  
**Subject:** Leader Russo Congressional Districts Response

?

Christine and John,

Leader Russo asked that I send this letter from her in response to the  
correspondence from President Huffman and Speaker Cupp earlier today  
regarding the Ohio Redistricting Commission's work on a Congressional  
District Plan.

*Andy Di Palma*

Minority Deputy Chief of Staff  
Ohio House of Representatives  
614 - 466 - 9042

# **Neiman Petitioners' Exhibit 59**

**From:** "Crooks, Aaron" <Aaron.Crooks@governor.ohio.gov>

**To:** "'To: 'Mike Dewine'" <Mike@silverdollarbaseball.com>

**Cc:** Jon Husted <jonahusted@gmail.com>, "Donahue, Matthew" <Matthew.Donahue@governor.ohio.gov>, "Hall, Michael" <Michael.Hall@governor.ohio.gov>, "Tierney, Daniel" <Dan.Tierney@governor.ohio.gov>

**Subject:** FW: Letter from President Huffman

**Date:** Fri, 25 Feb 2022 18:19:18 +0000

**Importance:** Normal

**Attachments:** Letter\_to\_Gov\_DeWine.pdf

---

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**From:** Pohlabel, Adam <Adam.Pohlabel@ohiosenate.gov>

**Sent:** Friday, February 25, 2022 1:11 PM

**To:** Crooks, Aaron <Aaron.Crooks@governor.ohio.gov>

**Subject:** Letter from President Huffman

Aaron,

Please see the attached letter from President Huffman.

Best,

**Adam Pohlabel**

Sr. Legislative Aide

Senate President Matt Huffman

614-466-7584

[Adam.Pohlabel@OhioSenate.gov](mailto:Adam.Pohlabel@OhioSenate.gov)

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



**Matt Huffman**  
Senate President

Statehouse  
1 Capitol Square  
Columbus, Ohio 43215

February 25, 2022

Governor DeWine,

As the Ohio Redistricting Commission completes a Congressional District Plan in accordance with the parameters laid out in the Constitution and the Ohio Supreme Court's opinions, I invite you to share any specific ideas or suggestions for a plan in advance of the Commission's planned meeting next week.

I have directed Ray DiRossi from my office to make himself available to meet with you over the next four days in order to discuss any proposals you may have developed. Please let him know if there are any times that are convenient for you to meet.

I look forward to continuing our work together as the redistricting process continues.

Sincerely,

A handwritten signature in black ink that reads "Matt Huffman". The signature is fluid and cursive.

Matt Huffman  
Senate President  
State Senator, 12<sup>th</sup> District

# **Neiman Petitioners' Exhibit 60**

**To:** Emily Redman[EERedman@ohioauditor.gov]  
**Cc:** State Senator Matt Huffman[Huffman@ohiosenate.gov]  
**From:** DiRossi, Ray  
**Sent:** Tue 3/1/2022 11:16:27 PM  
**Subject:** RE: Auditor Faber Email

Thanks Emily  
I have this on my list of things to look at tonight  
Thanks for sending the BAF  
Ray

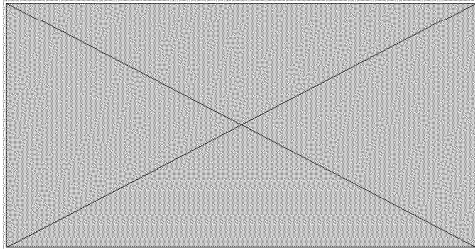
---

**From:** Emily Redman [EERedman@ohioauditor.gov]  
**Sent:** Tuesday, March 01, 2022 5:30 PM  
**To:** DiRossi, Ray  
**Cc:** State Senator Matt Huffman  
**Subject:** Auditor Faber Email

From Auditor Faber -

Here's a much more compact version of the map that was discussed today at the Commission meeting. Attached is the BAF and here is a link to Dave's: <https://davesredistricting.org/join/b922a7cf-76f2-44e3-a54b-2c432964a6a0>. Depending on what the Democrats want, more compromise could be down in District 1. Again, this is for discussion and needs to be cleaned up.

Auditor Faber continues to have concerns that have been discussed.



Update 03.01.22  
Redistricting Map  
[davesredistricting.org](https://davesredistricting.org)

Best,  
Emily

[Facebook](#)   [Twitter](#)   [OhioAuditor.gov](#)

# **Neiman Petitioners' Exhibit 61**

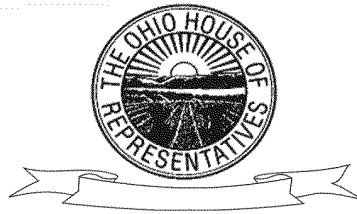
**To:** Christine.Morrison@ohiohouse.gov[Christine.Morrison@ohiohouse.gov]; Barron, John[John.Barron@ohiosenate.gov]  
**Cc:** Huffman, Matt[Matt.Huffman@ohiosenate.gov]; Bob.Cupp@ohiohouse.gov[Bob.Cupp@ohiohouse.gov]; Strigari, Frank[Frank.Strigari@ohiosenate.gov]; Oliveti, Chris[coliveti@OhioSOS.Gov]; Emily Redman[EERedman@ohioauditor.gov]; Sloan T. Spalding[STSpalding@ohioauditor.gov]; Sarah.Cherry@ohiohouse.gov[Sarah.Cherry@ohiohouse.gov]; Aaron.Crooks@governor.ohio.gov[Aaron.Crooks@governor.ohio.gov]; Boas, George[George.Boas@ohiosenate.gov]; Rothey, Kristin[Kristin.Rothey@ohiosenate.gov]; Stockman, Scott[Scott.Stockman@ohiosenate.gov]; jmauk@ohiosos.gov[jmauk@ohiosos.gov]; matthew.donahue@governor.ohio.gov[matthew.donahue@governor.ohio.gov]; mgrodhaus@OhioSOS.Gov[mgrodhaus@OhioSOS.Gov]; Routt, Randall[Randall.Routt@ohiosenate.gov]; Rowe, Mike[Mike.Rowe@ohiosenate.gov]; 'aaron.crooks@governor.ohio.gov'[aaron.crooks@governor.ohio.gov]; Paul.Disantis@ohiohouse.gov[Paul.Disantis@ohiohouse.gov]  
**From:** Andy.DiPalma@ohiohouse.gov  
**Sent:** Sat 2/26/2022 3:59:50 AM  
**Subject:** Leader Russo Congressional Districts Response  
[Leader Russo Congressional Dist. Response Ltr 2-25-22.dotx](#)

Christine and John,

Leader Russo asked that I send this letter from her in response to the correspondence from President Huffman and Speaker Cupp earlier today regarding the Ohio Redistricting Commission's work on a Congressional District Plan.

*Andy Di Palma*

Minority Deputy Chief of Staff  
Ohio House of Representatives  
614 - 466 - 9042



**Representative C. Allison Russo**  
**Minority Leader**

February 25, 2022

Dear Senate President Huffman and Speaker Cupp:

Thank you for reaching out and offering the availability of your staff to discuss progress on a congressional map. As I indicated during this week's Commission meetings, I am always willing to set aside partisan interests and collaborate on fair maps, as we are all duty-and oath-bound to do as members of this Commission. My staff and I remain broadly available for any discussions and work sessions to comply with all laws and the Court's order as we draw new congressional districts. This is evidenced by the Democrat Commissioner's repeated attempts to solicit input and feedback throughout the Congressional and state redistricting processes. Most recently, we sent your staff an updated version of our Senate Bill 237 congressional map on February 8, 2022 and invited all commissioner's staff to a meeting on February 23, 2022 to discuss this map. Unfortunately, your staff were not available to attend, and we have not yet heard back from any commissioner or staff member on any part of our proposal.

Additionally, to ensure all future staff-level meetings are productive, I strongly encourage all commission members to direct their staff to share and discuss any commissioner's preferences for how a map should look. To date, these staff-level meetings have generally taken the form of presentations by Democratic staff on one map or another without meaningful input from Republican staff or any resolution of differences or agreement on principles. If you are unwilling to empower your staff to share this information, perhaps the best use of our time is for individual commissioners to meet in an attempt to reach consensus on some basic constitutional principles and objectives that might lead to a sincere attempt to negotiate a bipartisan map acceptable to all commission members.

I believe we can all agree that it is far past time to roll up our sleeves and get this done. Ohio voters are depending on us to pass fair and constitutional maps. Please do not hesitate to call if you would like to meet or speak with me-- I am always available.

Kind regards,

C. Allison Russo

House Minority Leader

# **Neiman Petitioners' Exhibit 62**

**To:** Pohlabel, Adam[Adam.Pohlabel@ohiosenate.gov]; Barron, John[John.Barron@ohiosenate.gov]; Strigari, Frank[Frank.Strigari@ohiosenate.gov]  
**Cc:** Leak, Traevon[Traevon.Leak@ohiosenate.gov]; Calloway, Colin[Colin.Calloway@ohiosenate.gov]; 'Allison.Russo@ohiohouse.gov'[Allison.Russo@ohiohouse.gov]; 'Andy.DiPalma@ohiohouse.gov'[Andy.DiPalma@ohiohouse.gov]; Routt, Randall[Randall.Routt@ohiosenate.gov]; Rowe, Mike[Mike.Rowe@ohiosenate.gov]; Boas, George[George.Boas@ohiosenate.gov]  
**From:** Boas, George  
**Sent:** Fri 2/25/2022 10:21:54 PM  
**Subject:** Sen. Sykes to President Huffman  
Sykes Letter to Huffman - 02-25-2022.pdf

Hello Adam,  
Please find attached a letter from Sen. Sykes to President Huffman in response to his letter of earlier today.  
Thanks.  
George

George Boas  
Deputy Chief of Staff  
Senate Democratic Caucus  
Ohio Senate - Columbus, Ohio 43215  
T: 614-466-1049 / F: 614-644-1981



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## OHIO SENATE DEMOCRATIC CAUCUS

February 25, 2022

Dear President Huffman,

Thank you for your correspondence today to work on the development of constitutional congressional maps.

I agree our staffs should work collaboratively to facilitate the adoption of a congressional map as soon as possible. In fact, our staff and consultant had reached out to your staff earlier this week to arrange such a meeting. Unfortunately, Mr. DiRossi had communicated that he was not available to meet.

In response to your letter today, we have again directed Randall Routt and Chris Glassburn to contact Mr. DiRossi right away. I would urge *both* of our staffs to engage in an exchange of ideas *and* map proposals so that the Commission can meet the requirements of the Constitution and the Court order.

This would also be an opportunity for us to receive feedback, which we have not received yet, on the congressional plan which we submitted to the Ohio Redistricting Commission website on February 8, 2022.

Sincerely,

A handwritten signature in black ink, appearing to read "Vernon Sykes", with a stylized flourish at the end.

Senator Vernon Sykes  
Co-Chair, Ohio Redistricting Commission  
Senate District 28

CC: Leader C. Allison Russo

# **Neiman Petitioners' Exhibit 63**

**From:** "Pohlabel, Adam" <Adam.Pohlabel@ohiosenate.gov>

**To:** "coliveti@ohiosos.gov" <coliveti@ohiosos.gov>

**Subject:** [EXTERNAL] Letter from President Huffman

**Date:** Fri, 25 Feb 2022 18:09:23 +0000

**Importance:** Normal

**Attachments:** Letter\_to\_Secretary\_LaRose.pdf

---

**\*\*\*\*Secretary of State Security Notice\*\*\*\***

**This e-mail is from an external source. Think before you click links or open attachments.**

Chris,

Please see the attached letter from President Huffman.

Best,

**Adam Pohlabel**

Sr. Legislative Aide

Senate President Matt Huffman

614-466-7584

Adam.Pohlabel@OhioSenate.gov



**Matt Huffman**  
Senate President

Statehouse  
1 Capitol Square  
Columbus, Ohio 43215

February 25, 2022

Secretary LaRose,

As the Ohio Redistricting Commission completes a Congressional District Plan in accordance with the parameters laid out in the Constitution and the Ohio Supreme Court's opinions, I invite you to share any specific ideas or suggestions for a plan in advance of the Commission's planned meeting next week.

I have directed Ray DiRossi from my office to make himself available to meet with you over the next four days in order to discuss any proposals you may have developed. Please let him know if there are any times that are convenient for you to meet.

I look forward to continuing our work together as the redistricting process continues.

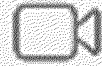
Sincerely,

A handwritten signature in black ink that reads "Matt Huffman". The signature is fluid and cursive.

Matt Huffman  
Senate President  
State Senator, 12<sup>th</sup> District

# **Neiman Petitioners' Exhibit 64**

11:26



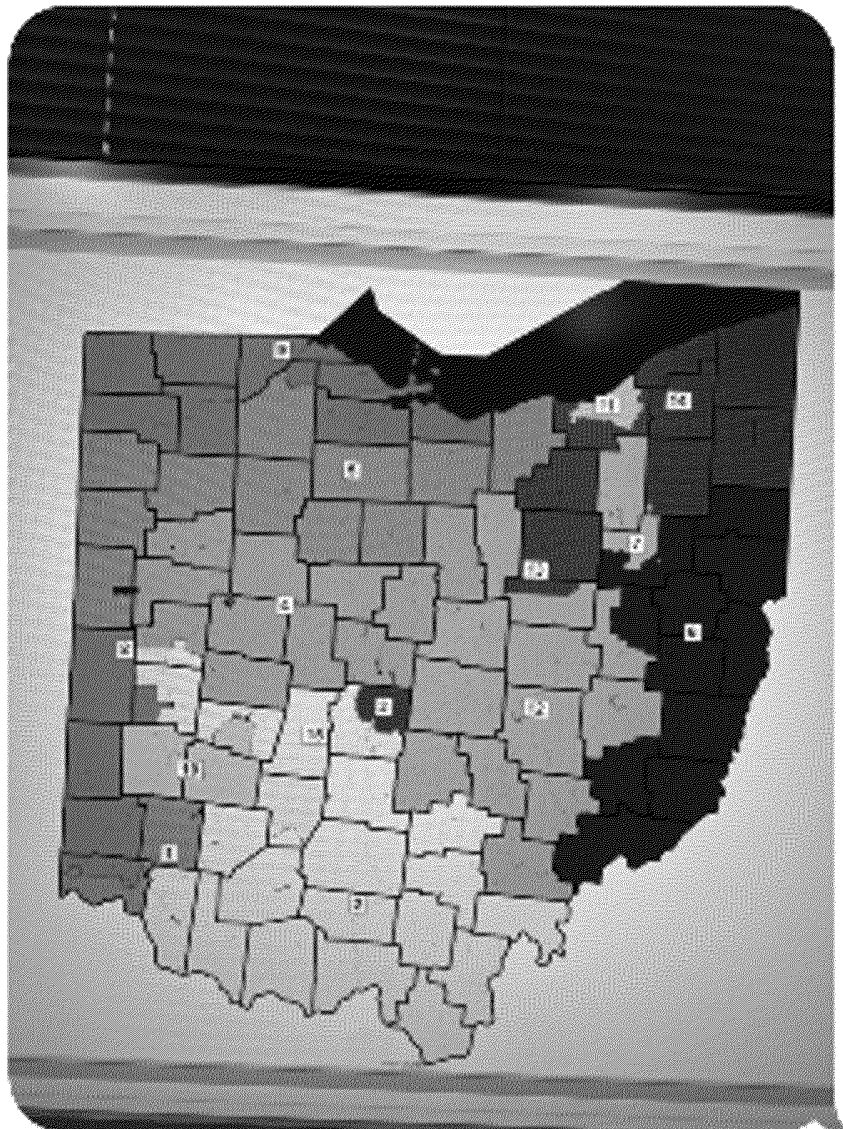
Keith L Faber >

Fri, Feb 25, 14:50

Can I call you later?

Please do

Sun, Feb 27, 18:34

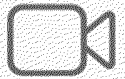
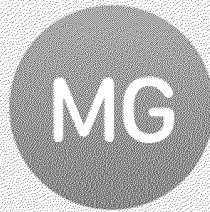


NEIMAN\_EVID\_00611

SOS\_000780

# **Neiman Petitioners' Exhibit 65**

11:46 ↗



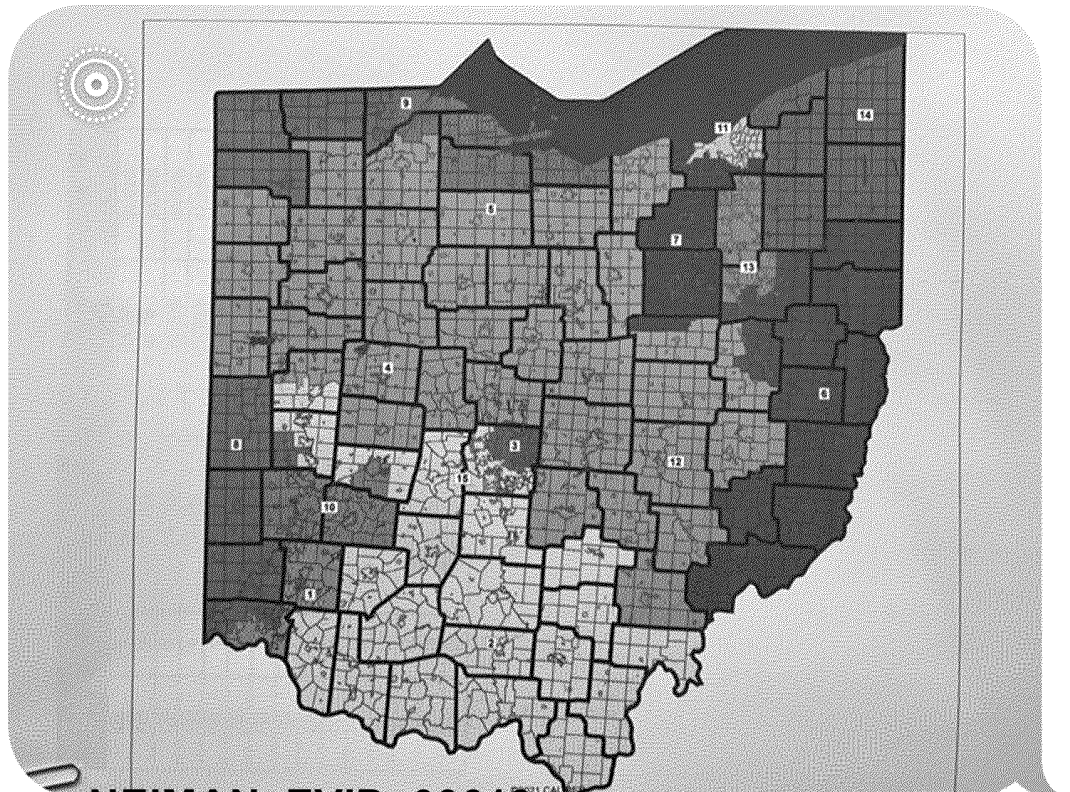
Madison Gesiotto >

Sun, Feb 27, 18:25

Hey there, hope you're doing well.  
Give me a call when you have a  
chance please

I'll call you right back

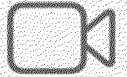
Tue, Mar 1, 14:07



NEIMAN\_EVID\_00613

SOS\_000781

11:46 ↗



Madison Gesiotto >

Tue, Mar 1, 15:22



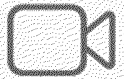
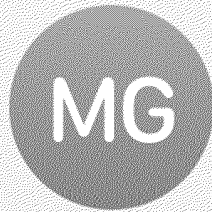
On a plane now. Will call you this evening.

Tue, Mar 1, 20:07



	District	Population	Deviation #	16 - 18 - 20 Index R	16 - 18 - 20 Index D
CD	1	786,630	0	48.99%	51.01%
CD	2	786,629	-1	69.74%	30.26%
CD	3	786,630	0	31.10%	68.90%
CD	4	786,630	0	67.85%	32.15%
CD	5	786,630	0	61.34%	38.66%
CD	6	786,630	0	59.06%	40.94%
CD	7	786,630	0	54.42%	45.58%
CD	8	786,629	-1	62.45%	37.55%
CD	9	786,630	0	49.77%	50.23%
CD	10	786,630	0	53.32%	46.68%
CD	11	786,630	0	20.17%	79.83%
CD	12	786,630	0	63.32%	36.68%
CD	13	786,630	0	47.85%	52.15%
CD	14	786,630	0	54.83%	45.17%
CD	15	786,630	0	54.31%	45.69%

11:46 ↗



Madison Gesiotto >

Wed, Mar 2, 07:28

One more word of caution and you know this, the maps aren't final until they are... I'll keep you posted if there are any changes made before we pass the map today but of course there's still always a chance they could get struck down again by the courts. That's just a risk you need to calculate for in your decision making process

How quickly do you think courts will look at this map?

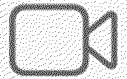
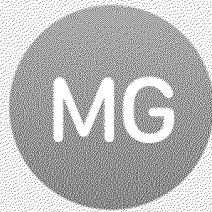
If approved today

The Ohio Supreme Court has been generally taking three weeks or so

NEIMAN\_EVID\_00615

SOS\_000783

11:46 ↗



Madison Gesiotto >

The Ohio Supreme Court has been generally taking three weeks or so each time but of course the court moves at their own schedule and their could always be a federal lawsuit as well which is highly unpredictable

Wed, Mar 2, 11:32

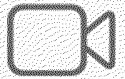
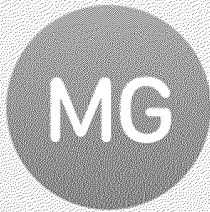
The map that we just passed is basically exactly what I showed you yesterday. Any changes that were made are non-substantial and don't impact the 13th or 9th district



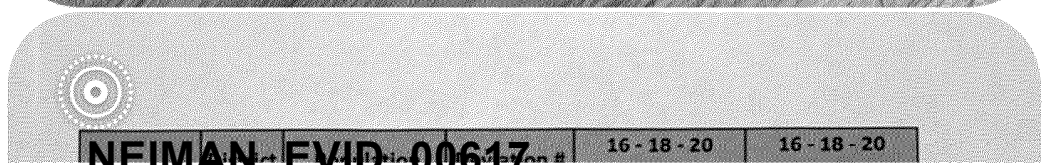
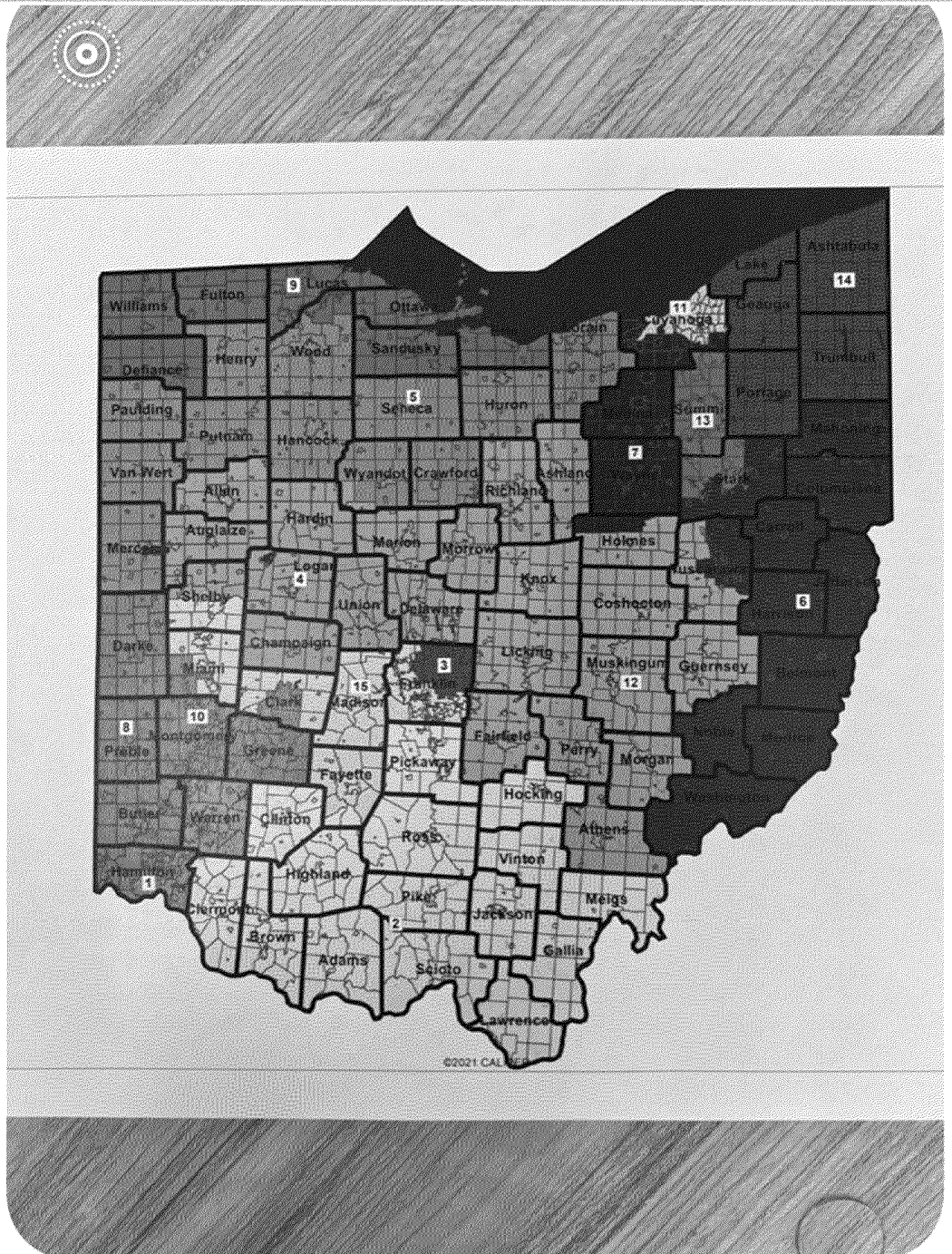
NEIMAN\_EVID\_00616

SOS\_000784

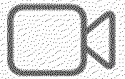
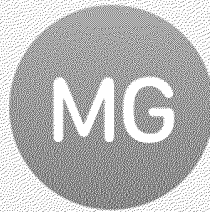
11:46



Madison Gesiotto >



11:46 ↗



Madison Gesiotto &gt;



	District	Population	Deviation #	16 - 18 - 20 Index R	16 - 18 - 20 Index D
CD	1	786,630	0	48.96%	51.04%
CD	2	786,629	-1	69.74%	30.26%
CD	3	786,630	0	31.09%	68.91%
CD	4	786,630	0	67.85%	32.15%
CD	5	786,630	0	61.34%	38.66%
CD	6	786,630	0	59.06%	40.94%
CD	7	786,630	0	54.42%	45.58%
CD	8	786,629	-1	62.65%	37.35%
CD	9	786,630	0	49.77%	50.23%
CD	10	786,630	0	53.32%	46.68%
CD	11	786,630	0	20.17%	79.83%
CD	12	786,630	0	63.32%	36.68%
CD	13	786,630	0	47.85%	52.15%
CD	14	786,630	0	54.83%	45.17%
CD	15	786,630	0	54.20%	45.80%

# **Neiman Petitioners' Exhibit 66**

**To:** eredman12@icloud.com[eredman12@icloud.com]  
**From:** Springhetti, Blake  
**Sent:** Mon 2/21/2022 3:26:27 PM  
**Subject:** Fwd: Congressional Plan Information  
Proposed Congressional Plan Images and BAF.zip

;

See attached and below.  
Blake

Begin forwarded message:

**From:** "Springhetti, Blake" <Blake.Springhetti@ohiohouse.gov>  
**Date:** February 21, 2022 at 10:09:12 AM EST  
**To:** eeredman@ohioauditor.gov  
**Subject: Congressional Plan Information**

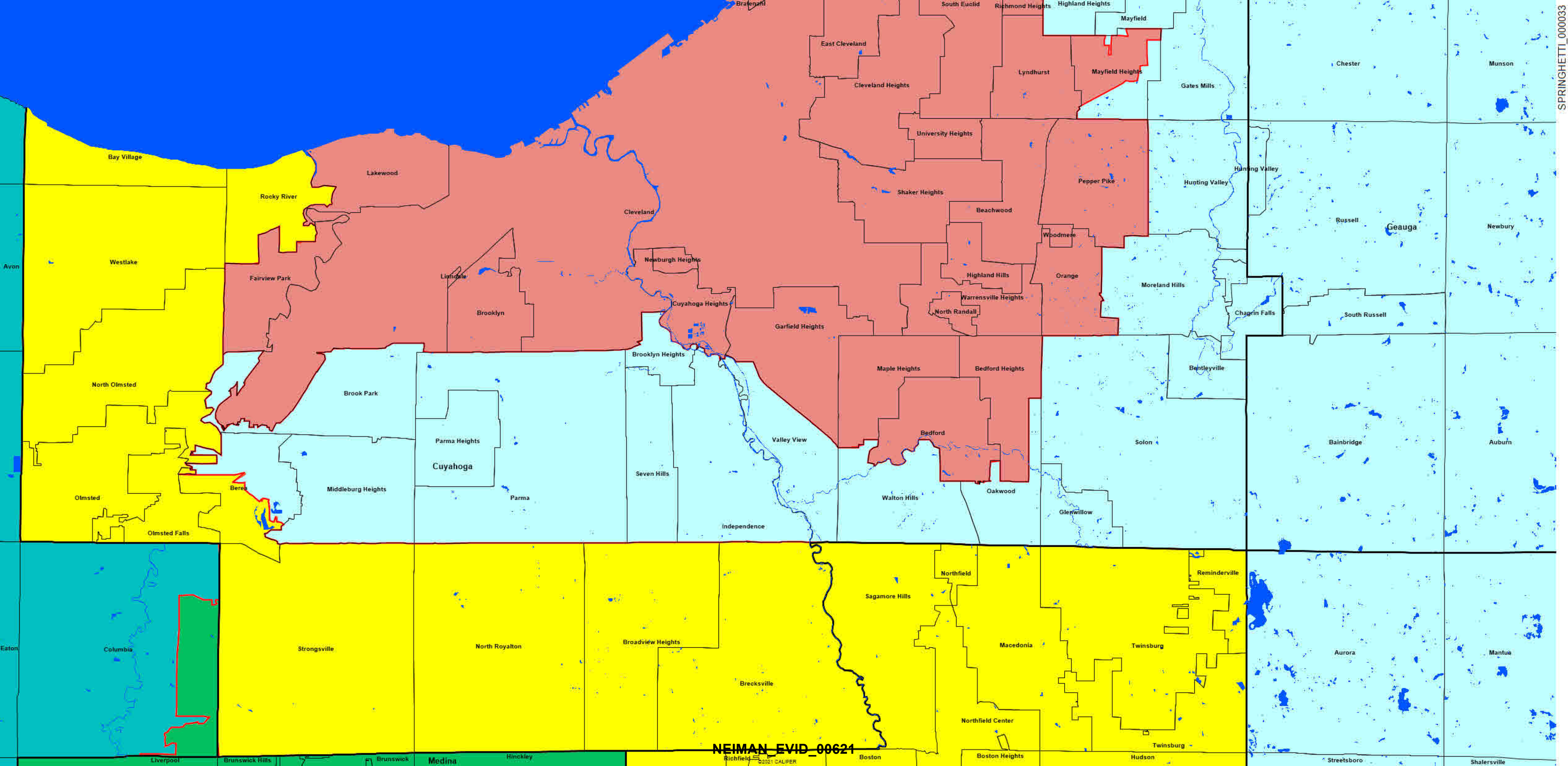
Emily,  
Christine asked me to share the attached BAF for a Congressional Plan discussed with Sloan a few weeks back.

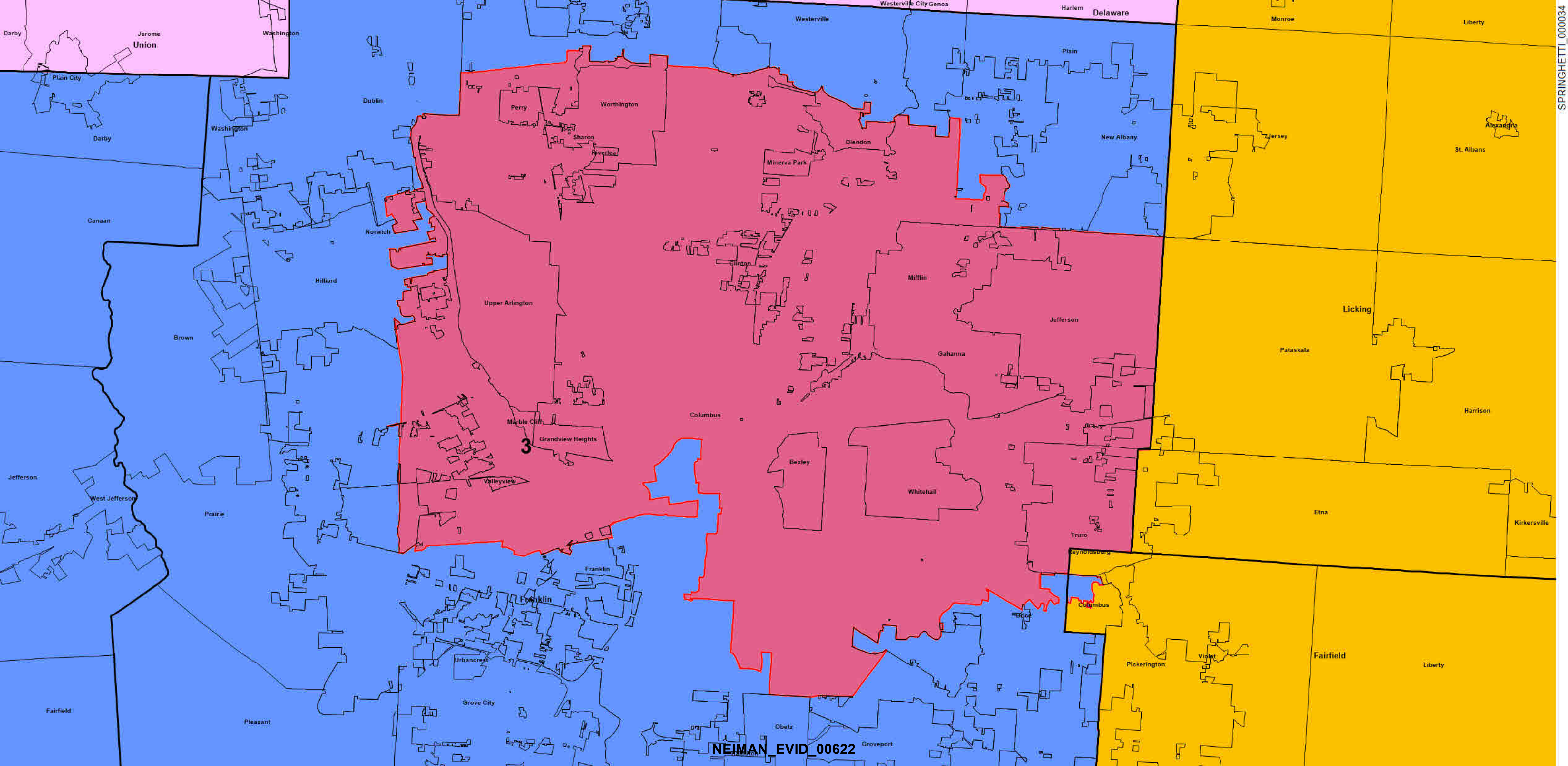
I included images in case you are not sitting in front of Maptitute.

Kind regards,

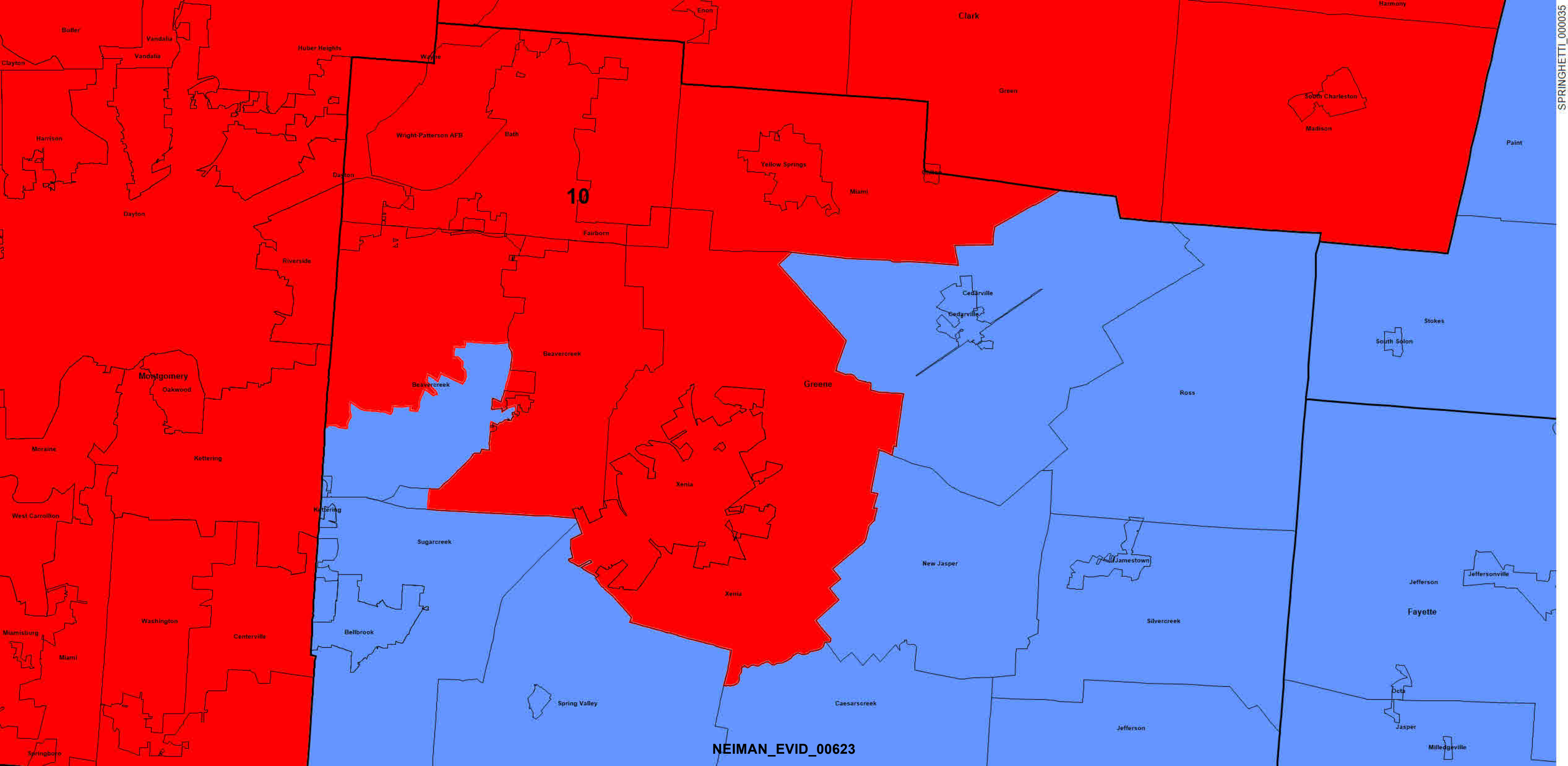
**Blake V. Springhetti**

Majority Director of Finance  
Ohio House of Representatives  
77 S. High Street, 14<sup>th</sup> Floor | Columbus, OH 43215  
Office: 614.728.5401 | Blake.Springhetti@ohiohouse.gov

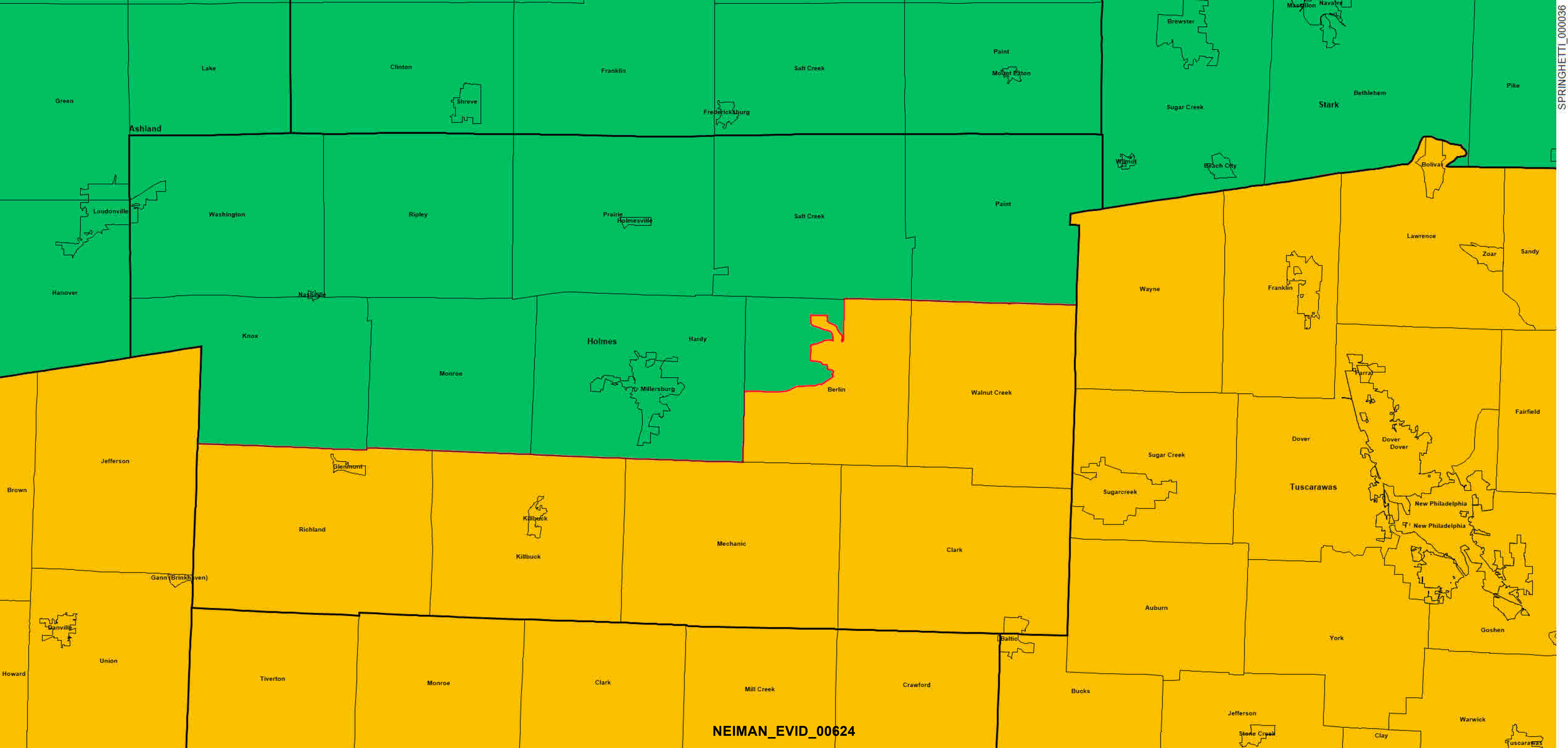


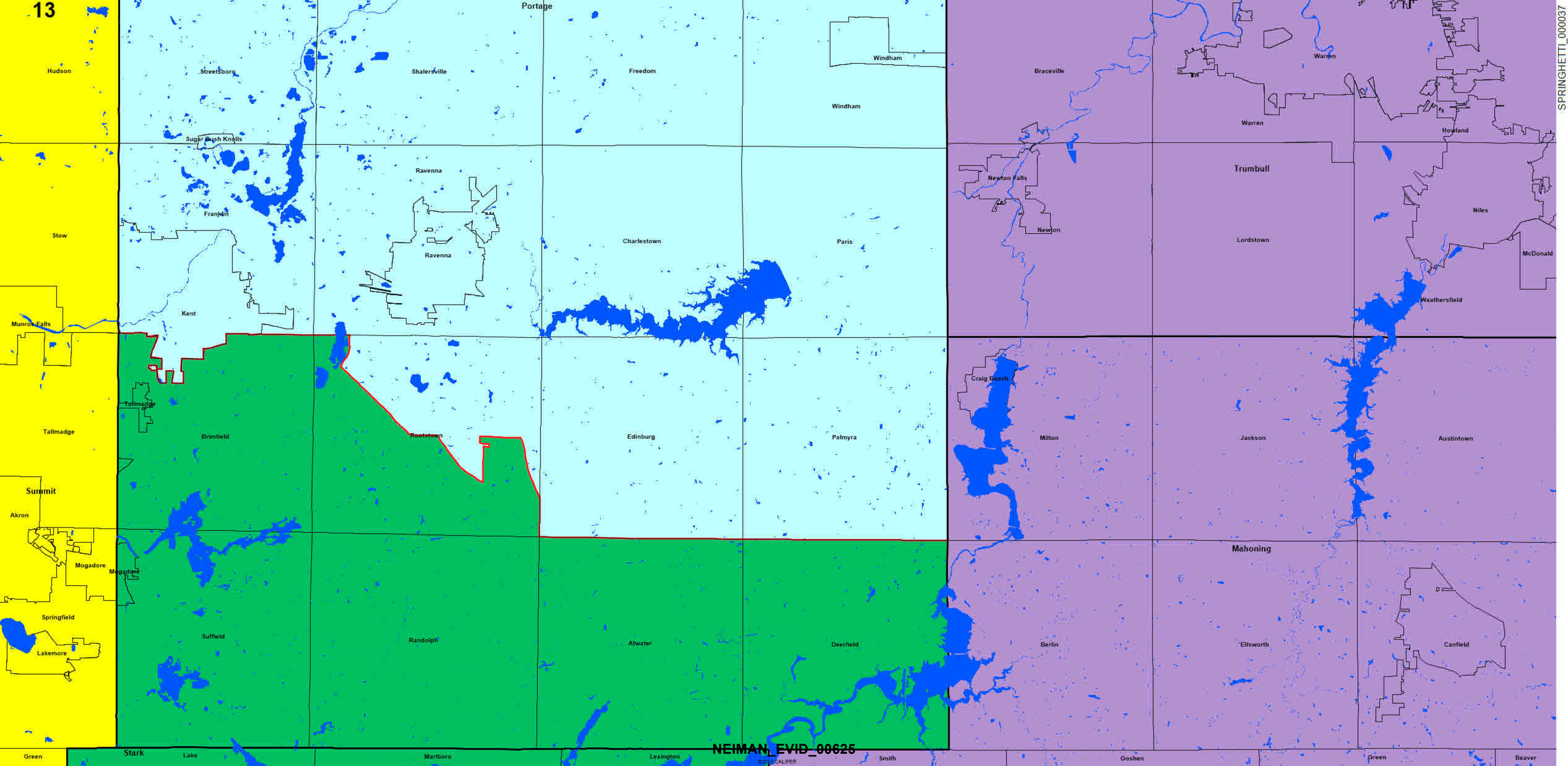


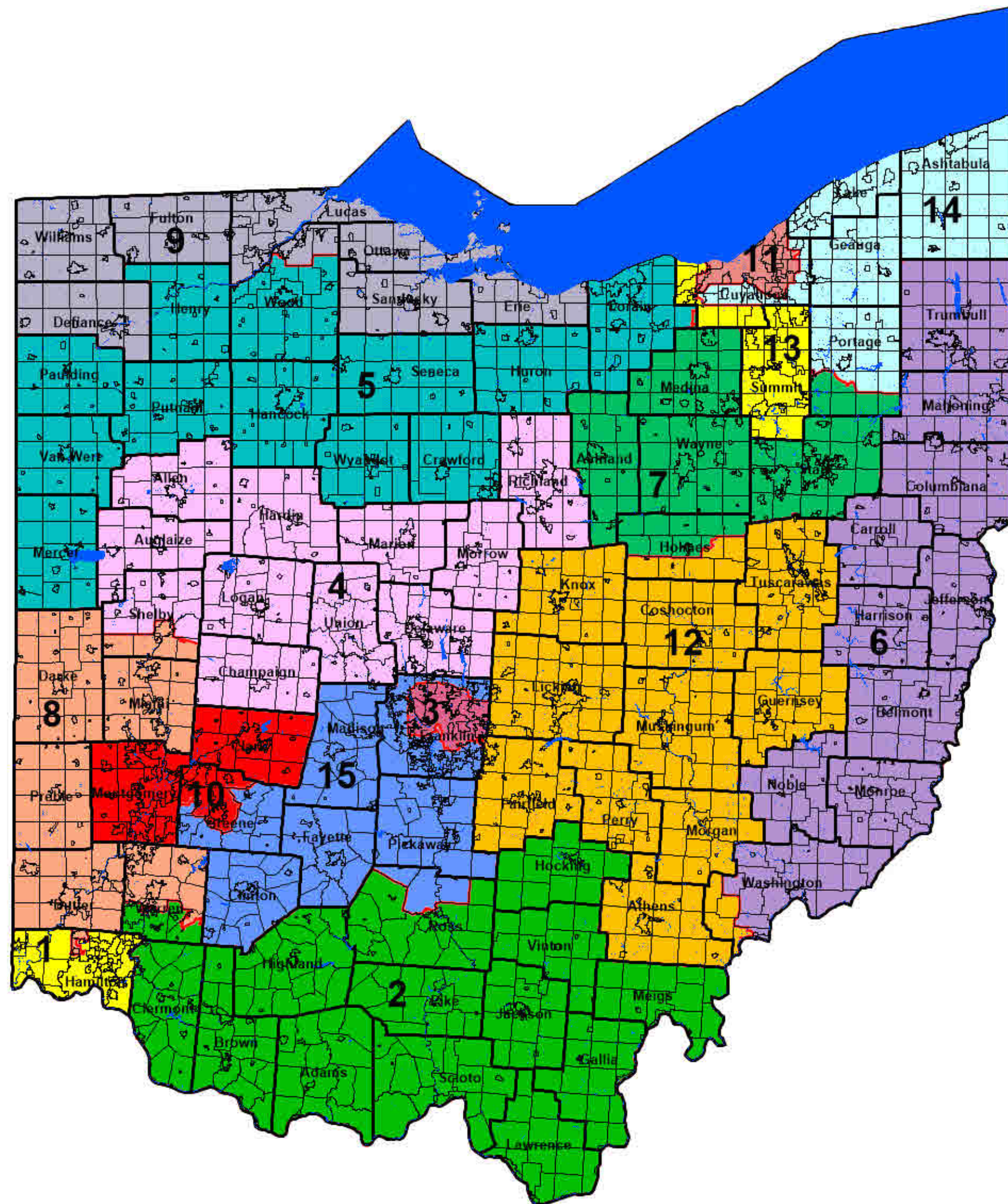
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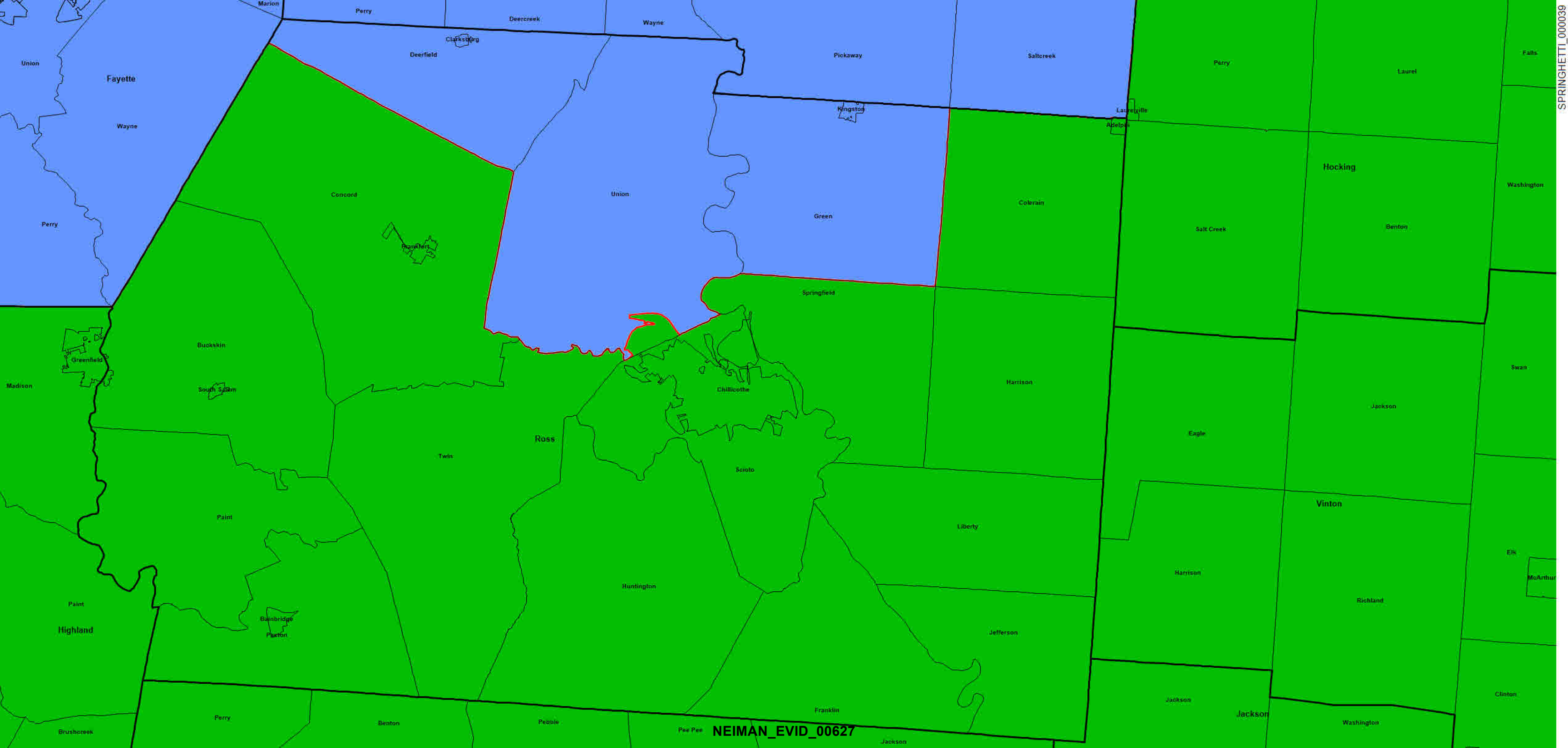


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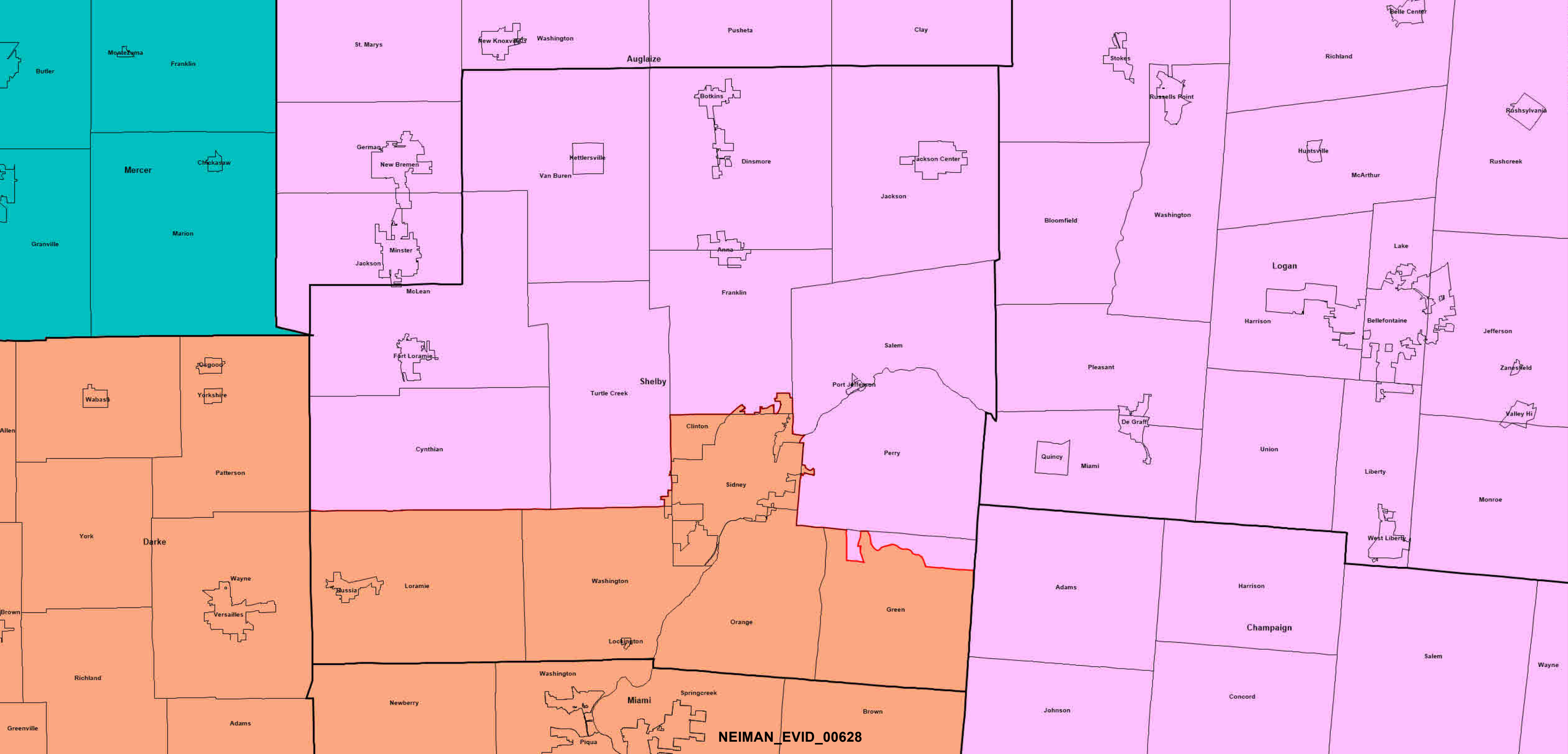


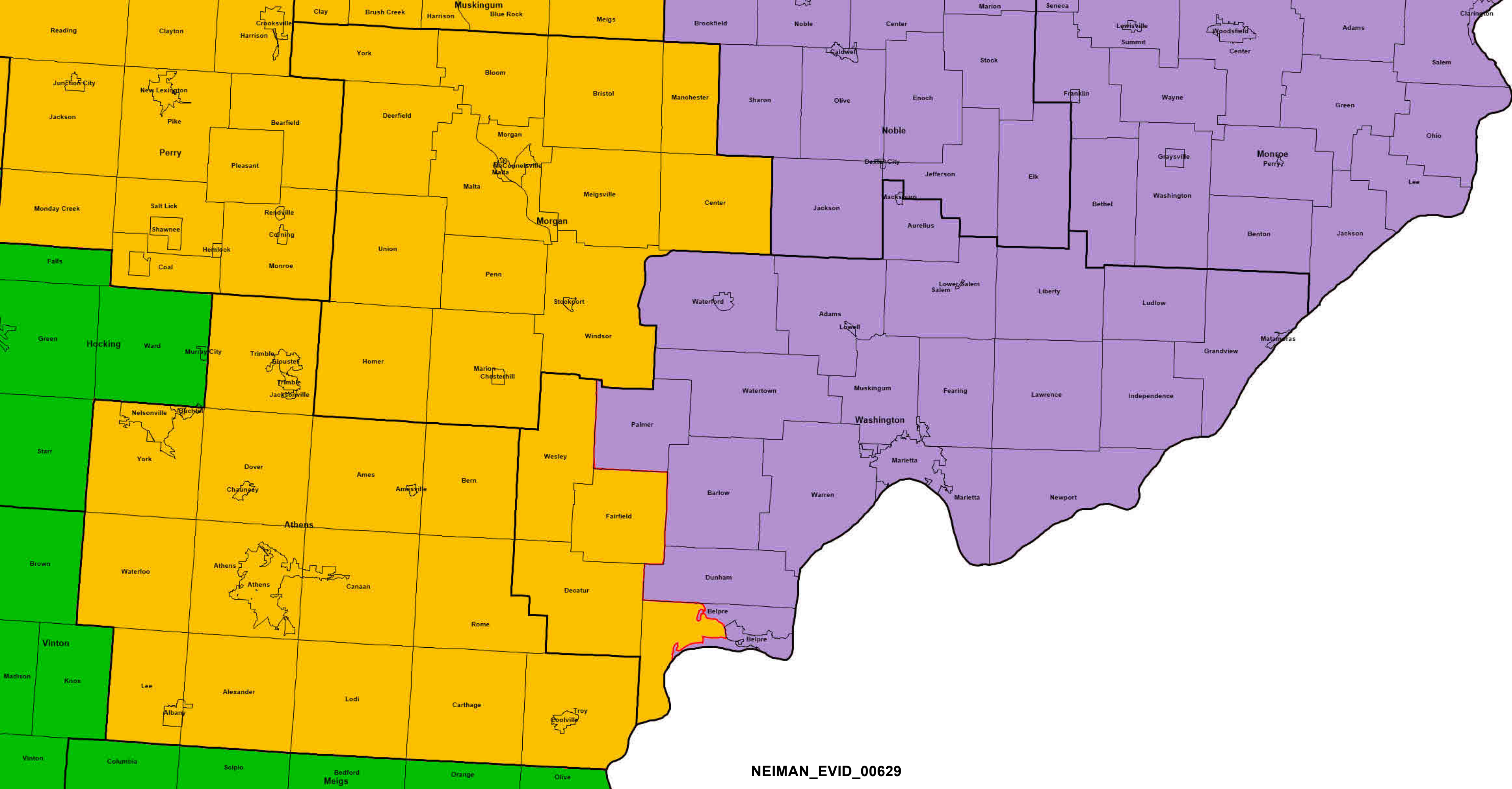




NEIMAN\_EVID\_00627

SPRINGHETTL 000039









# **Neiman Petitioners' Exhibit 67**

**Cc:** Cherry, Sarah[Sarah.Cherry@ohiohouse.gov]; chris@projectgovern.com[chris@projectgovern.com]; DiRossi, Ray[Ray.DiRossi@ohiosenate.gov]  
**To:** Routt, Randall[Randall.Routt@ohiosenate.gov]  
**From:** Springhetti, Blake  
**Sent:** Sun 2/27/2022 2:04:49 AM  
**Subject:** Re: Meet to discuss Congressional map proposals

;  
Sounds good to me.

On Feb 26, 2022, at 8:32 PM, Routt, Randall <Randall.Routt@ohiosenate.gov> wrote:

I can make 12:30 tomorrow

On Feb 26, 2022, at 8:07 PM, sarah.cherry@ohiohouse.gov wrote:

I forwarded her letter to you and Ray. I can make 12:30 work. Just let me know if this meeting comes together and I'll be there. Thanks.

On Feb 26, 2022, at 6:53 PM, Springhetti, Blake  
<Blake.Springhetti@ohiohouse.gov> wrote:

Sarah  
I have not seen such letter. I am willing to meet tomorrow, just curious if Senator Sykes and/or Leader Russo will attend.

12:30 in the Senate minority caucus room would work for me.

On Feb 26, 2022, at 6:47 PM, Cherry, Sarah  
<Sarah.Cherry@ohiohouse.gov> wrote:

Blake and Ray, when and where do you propose to meet and who do you propose should attend?

Randall let Ray know yesterday that Sen. Sykes said staff can meet with staff. I believe you've seen Leader Russo's letter from last night and my email from earlier today.

If you have a congressional map to share, we'd be happy to look at it and let you know if our bosses would be interested in voting for it or if they have suggested changes.

Thank you.

Sarah

On Feb 26, 2022, at 5:07 PM,  
Springhetti, Blake  
<Blake.Springhetti@ohiohouse.gov>  
wrote:

Hey Randall,  
Thanks for reaching out. Would this be  
a staff only meeting?  
Blake

On Feb 25, 2022, at 7:02  
PM, Routt, Randall  
<Randall.Routt@ohiosenate.gov> wrote:

Blake,  
Senator Sykes has directed to  
me to contact you so we can  
arrange a meeting to discuss  
and exchange congressional  
map proposals that meet the  
requirements of the  
Constitution and the Court  
order. Let me know when is a  
good time to connect. I have  
availability tomorrow  
morning and all day Sunday,  
and Monday.  
Thanks,  
Randall Routt  
Policy Advisor  
Senate Democratic Caucus

# **Neiman Petitioners' Exhibit 68**

**To:** Cherry, Sarah[Sarah.Cherry@ohiohouse.gov]; Routt, Randall[Randall.Routt@ohiosenate.gov]; Springhetti, Blake[Blake.Springhetti@ohiohouse.gov]  
**Cc:** chris@projectgovern.com[chris@projectgovern.com]  
**From:** DiRossi, Ray  
**Sent:** Sun 2/27/2022 1:51:59 PM  
**Subject:** RE: Meet to discuss Congressional map proposals

.....  
\*\*\*\*\*

Thank you  
See you all then  
Ray

---

**From:** Sarah.Cherry@ohiohouse.gov [Sarah.Cherry@ohiohouse.gov]  
**Sent:** Saturday, February 26, 2022 10:43 PM  
**To:** Routt, Randall; Blake.Springhetti@ohiohouse.gov  
**Cc:** DiRossi, Ray; chris@projectgovern.com  
**Subject:** Re: Meet to discuss Congressional map proposals

I'm available at 1.

***Sarah A. Cherry***

*Legal Counsel, Minority Caucus  
she/her/hers*

Ohio House of Representatives  
77 South High Street, 14th Floor  
Columbus, OH 43215  
office: (614) 466-6040  
[sarah.cherry@ohiohouse.gov](mailto:sarah.cherry@ohiohouse.gov)

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**From:** Routt, Randall <Randall.Routt@ohiosenate.gov>  
**Sent:** Saturday, February 26, 2022 10:13 PM  
**To:** Springhetti, Blake  
**Cc:** DiRossi, Ray; Cherry, Sarah; chris@projectgovern.com  
**Subject:** Re: Meet to discuss Congressional map proposals  
I'm good with 1 pm

On Feb 26, 2022, at 10:07 PM, Blake.Springhetti@ohiohouse.gov wrote:

1p works for me.

On Feb 26, 2022, at 9:33 PM, DiRossi, Ray <Ray.DiRossi@ohiosenate.gov> wrote:

Could be do 1 PM instead?  
I think I could make 12:30 but 1:00 PM would give me more time between meetings  
Ray

---

**From:** Blake.Springhetti@ohiohouse.gov [Blake.Springhetti@ohiohouse.gov]  
**Sent:** Saturday, February 26, 2022 9:04 PM  
**To:** Routt, Randall  
**Cc:** Sarah.Cherry@ohiohouse.gov; chris@projectgovern.com; DiRossi, Ray  
**Subject:** Re: Meet to discuss Congressional map proposals

Sounds good to me.

On Feb 26, 2022, at 8:32 PM, Routt, Randall  
<Randall.Routt@ohiosenate.gov> wrote:

I can make 12:30 tomorrow

On Feb 26, 2022, at 8:07 PM,  
sarah.cherry@ohiohouse.gov wrote:

I forwarded her letter to you and Ray. I can make 12:30 work. Just let me know if this meeting comes together and I'll be there. Thanks.

On Feb 26, 2022, at 6:53 PM,  
Springhetti, Blake  
<Blake.Springhetti@ohiohouse.gov>  
wrote:

Sarah

I have not seen such letter. I am willing to meet tomorrow, just curious if Senator Sykes and/or Leader Russo will attend.

12:30 in the Senate minority caucus room would work for me.

On Feb 26, 2022, at 6:47 PM, Cherry, Sarah  
<Sarah.Cherry@ohiohouse.gov> wrote:

Blake and Ray, when and where do you propose to meet and who do you propose should attend?

Randall let Ray know yesterday that Sen. Sykes said staff can meet with staff. I believe you've seen Leader Russo's letter from last night and my email from earlier today.

If you have a congressional map to share, we'd be happy to look at it and let you know if our bosses would be interested in voting for it or if they have suggested changes.

Thank you.

Sarah

On Feb 26, 2022, at 5:07 PM, Springhetti, Blake  
<Blake.Springhetti@ohiohouse.gov> wrote:

Hey Randall,  
Thanks for  
reaching out.  
Would this be  
a staff only  
meeting?  
Blake

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# **Neiman Petitioners' Exhibit 69**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**SPEAKER CUPP’S RESPONSE TO NEIMAN PETITIONERS’  
FIRST SET OF INTERROGATORIES**

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Respondent Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Speaker Cupp makes the following answers, responses, and objections to Petitioners’ First Set of Interrogatories (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by Speaker Cupp that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Speaker Cupp acquires additional

information. Speaker Cupp states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Speaker Cupp responds or objects to any Requests should not be taken as an admission that Speaker Cupp accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Speaker Cupp responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Speaker Cupp of any part of any objection to any Requests. Speaker Cupp will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Speaker Cupp has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Speaker Cupp also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Speaker Cupp is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Speaker Cupp to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the

discovery of relevant admissible evidence. As such, in his responses, Speaker Cupp has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan. Speaker Cupp further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Speaker Cupp to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Speaker Cupp further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Speaker Cupp also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Speaker Cupp lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **INTERROGATORIES**

### **INTERROGATORY #1**

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Speaker Cupp objects that the terms “formally and informally” are vague and ambiguous. Speaker Cupp also objects to the extent it seeks information not within the personal knowledge of Speaker Cupp. Subject to and without waiving the foregoing objections, Speaker Cupp states that the Congressional Plan adopted by the Commission on March 2, 2022 was primarily drawn by Mr. Blake Springhetti and Mr. Ray DiRossi. Speaker Cupp further states that negotiations and consultation with Democratic Mapdrawer Mr. Chris Glassburn also occurred, and that Mr. Springhetti and Mr. DiRossi were available to all members of the Commission. Speaker Cupp further identifies any employee of Ohio University that participated in creating the Common Unified Redistricting Database (otherwise known as the CURD).

### **INTERROGATORY #2**

Describe the role played by any individuals identified in Interrogatory No. 1.

**ANSWER:** Speaker Cupp objects to this Interrogatory on the grounds that “formally and informally” and “role” is vague and ambiguous. Speaker Cupp further objects to the extent it seeks information not within the personal knowledge of Speaker Cupp. Speaker Cupp states that Mr. DiRossi and Mr. Springhetti assisted in drawing the congressional districts, with input from members of the Ohio Redistricting Commission, Mr. Christopher Glassburn, and public input.

### **INTERROGATORY #3**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that upon the failure of the General Assembly to pass a second Congressional Plan, the Commission began conducting hearings and working on a congressional district plan. The hearings and public testimony are available online on the Ohio Redistricting Commission website at <https://redistricting.ohio.gov/>. Ultimately, the Commission adopted a congressional district plan on March 2, 2022 in compliance with the Court's order in *Adams v. DeWine*, and in compliance with all other applicable state and federal laws.

### **INTERROGATORY #4**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Speaker Cupp objects to this Interrogatory because it seeks information not within the personal knowledge of Speaker Cupp. This request is properly directed to Senator Sykes and/or Leader Russo.

### **INTERROGATORY #5**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp does not recall when he first viewed the March 2 Plan, but refers Petitioners to documents produced contemporaneously showing email exchanges between Commission members and/or their staff regarding proposed congressional districting plans.

**INTERROGATORY #6**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that individuals involved in the creation of the 2022 Congressional Plan were instructed to comply with applicable state and federal law including the requirements of the Ohio Constitution, and the Court's order in *Adams v. DeWine*.

**INTERROGATORY #7**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp also objects to this Interrogatory to the extent that it seeks information beyond his personal knowledge. Speaker Cupp further objects to this Interrogatory to the extent it seeks a legal opinion or improper lay witness testimony. Subject to and without waiving these objections, Speaker Cupp states that the March 2 Congressional Plan was intentionally constructed to comply with the Court's order in *Adams v. DeWine*, and all applicable provisions of the Ohio Constitution.

#### **INTERROGATORY #8**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent that it seeks information outside of his personal knowledge. Speaker Cupp further objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Speaker Cupp states that he and the individuals identified in Interrogatory No. 1 are current State employees and that some, like Ray DiRossi and Blake Springhetti, received a temporary increase in their regular state salaries to account for the increased time and demand on performing their jobs during legislative and congressional redistricting.

#### **INTERROGATORY #9**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this Interrogatory is overly broad and unduly burdensome in that it is not limited to a relevant time frame, nor is it limited to relevant actors in this matter. Subject to and without waiving these objections, Speaker Cupp states that he communicated with Mr. Springhetti, members of his staff, Mr. DiRossi, Senate President Huffman, and members of the Ohio Redistricting Commission. Speaker Cupp further states that he discussed Congressional district plans at all Commission hearings identified in response to Interrogatory No. 12 and the members of the public that spoke at those hearings.

**INTERROGATORY #10**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #11**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #12**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this Interrogatory is overly broad and unduly burdensome in that it seeks identification of any meeting, for an entire year, where congressional redistricting was discussed. As such, this request is not narrowly tailored in time or scope to Petitioners' Complaint. Subject to and without waiving these objections, Speaker Cupp identifies the Ohio Redistricting Commission Committee meetings on February 22, 2022; February 23, 2022; February 24, 2022; March 1, 2022; March 2, 2022.

### **INTERROGATORY #13**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Speaker Cupp objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to his response to Interrogatory No. 1.

### **INTERROGATORY #14**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that all applicable state and federal law was consulted and adhered to in the drafting of the March 2 Congressional Plan. Speaker Cupp further states that maps were drawn and submitted on the Ohio Redistricting Commission Website. Speaker Cupp further refers Petitioners to documents produced contemporaneously with this request.

### **INTERROGATORY #15**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to this Interrogatory on the ground that “public release” is vague, and undefined. Speaker Cupp further objects that this request calls for information outside of his knowledge. Subject to and without waiving these objections Speaker Cupp refers Petitioners to his response to Interrogatory No. 1, detailing the individuals involved in drafting the 2022 Congressional Plan.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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/s/ Phillip J. Strach

# **Neiman Petitioners' Exhibit 70**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**SPEAKER CUPP’S RESPONSES TO NEIMAN PETITIONERS’  
FIRST SET OF REQUESTS FOR PRODUCTION**

Respondent Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

Speaker Cupp makes the following answers, responses, and objections to Petitioners’ First Set of Requests for Production of Documents (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by Speaker Cupp that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Speaker Cupp acquires additional

information. Speaker Cupp states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Speaker Cupp responds or objects to any Requests should not be taken as an admission that Speaker Cupp accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Speaker Cupp responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Speaker Cupp of any part of any objection to any Requests. Speaker Cupp will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Speaker Cupp has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Speaker Cupp also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Speaker Cupp is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Speaker Cupp to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the

discovery of relevant admissible evidence. As such, in his responses, Speaker Cupp has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan.

Speaker Cupp further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Speaker Cupp to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Speaker Cupp further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Speaker Cupp also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Speaker Cupp lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Speaker Cupp objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio General Assembly. Speaker Cupp further objects that this Request is overly broad and unduly burdensome in that it has no bearing on Petitioners' claims in this matter. The General Assembly did not pass a Congressional Plan and as a result, the Commission passed a Congressional Plan on March 2, 2022.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Speaker Cupp objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio Redistricting Commission. Speaker Cupp further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Speaker Cupp objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Speaker Cupp refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged

documents being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Speaker Cupp objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio Redistricting Commission.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that he considered compliance to mean complying with all applicable state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* when instructing mapdrawers and when determining to vote for the Congressional Plan adopted on March 2, 2022. Speaker Cupp further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Request on the grounds that it is duplicative of Request number 6. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to his responses and objections to Request Number 6.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Speaker Cupp refers Petitioners to documents produced contemporaneously

with these requests and Speaker Cupp's response to Interrogatory No. 1.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Speaker Cupp objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this request is overly broad, unduly burdensome, and seeks information outside of Speaker Cupp's knowledge. The request seeks documents and information pertaining to meetings with any Ohio Redistricting Commission Members, regardless of whether Speaker Cupp was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners' needs in this case, and beyond what Speaker Cupp can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that mapdrawers were instructed to comply with all applicable state and federal laws, and the Court's opinion in *Adams v. DeWine*. Speaker Cupp further states that no racial data was considered in drawing the Congressional Plan at issue in this action. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Speaker Cupp objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects

that this request seeks information beyond his knowledge as he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Speaker Cupp states that he does not possess any such documents or contracts other than those for redistricting software and supplies as previously produced in *Bennett v. ORC*, 2021-1198.

13. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Speaker Cupp objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

14. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Speaker Cupp objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Speaker Cupp also objects that this request is not relevant, as Speaker Cupp's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Speaker Cupp objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Speaker Cupp also objects that this request is not relevant, as even if Speaker Cupp had communications with these organizations, those communications would have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Speaker Cupp states that to the extent any responsive documents exist, they are being produced

contemporaneously.

16. All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

18. All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Speaker Cupp refers Petitioners to documents being produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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/s/ Phillip J. Strach



4881-3165-0076 v.1

# **Neiman Petitioners' Exhibit 71**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**SENATE PRESIDENT HUFFMAN’S RESPONSE TO NEIMAN PETITIONERS’  
FIRST SET OF INTERROGATORIES**

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Respondent Senate President Matthew Huffman (“Senate President Huffman”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Senate President Huffman makes the following answers, responses, and objections to Petitioners’ First Set of Interrogatories (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Senate President Huffman’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Senate President Huffman gained in their capacity as such, and (b) a review of the documents and materials maintained by Senate President Huffman that would be likely to contain the information

called for by the Requests. These responses are subject to amendment and supplementation as Senate President Huffman acquires additional information. Senate President Huffman states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Senate President Huffman responds or objects to any Requests should not be taken as an admission that Senate President Huffman accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Senate President Huffman responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Senate President Huffman of any part of any objection to any Requests. Senate President Huffman will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Senate President Huffman has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Senate President Huffman also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Senate President Huffman is sued in his official

capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Senate President Huffman to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Senate President Huffman has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan. Senate President Huffman further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Senate President Huffman to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Senate President Huffman further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Senate President Huffman also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Senate President Huffman lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **INTERROGATORIES**

### **INTERROGATORY #1**

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Senate President Huffman objects that the terms “formally and informally” are vague and ambiguous. Senate President Huffman also objects to the extent it seeks information not within the personal knowledge of Senate President Huffman. Subject to and without waiving the foregoing objections, Senate President Huffman states that the Congressional Plan adopted by the Commission on March 2, 2022 was primarily drawn by Mr. Blake Springhetti and Mr. Ray DiRossi. Senate President Huffman further states that negotiations and consultation with Democratic Mapdrawer Mr. Chris Glassburn also occurred, and that Mr. Springhetti and Mr. DiRossi were available to all members of the Commission. Senate President Huffman further identifies any employee of Ohio University that participated in creating the Common Unified Redistricting Database (otherwise known as the CURD).

### **INTERROGATORY #2**

Describe the role played by any individuals identified in Interrogatory No. 1.

**ANSWER:** Senate President Huffman objects to this Interrogatory on the grounds that “formally and informally” and “role” is vague and ambiguous. Senate President Huffman further objects to the extent it seeks information not within the personal knowledge of Senate President Huffman. Senate President Huffman states that Mr. DiRossi and Mr. Springhetti assisted in drawing the congressional districts, with input from members of the Ohio Redistricting Commission, Mr. Christopher Glassburn, and public input.

### **INTERROGATORY #3**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that upon the failure of the General Assembly to pass a second Congressional Plan, the Commission began conducting hearings and working on a congressional district plan. The hearings and public testimony are available online on the Ohio Redistricting Commission website at <https://redistricting.ohio.gov/>. Ultimately, the Commission adopted a congressional district plan on March 2, 2022 in compliance with the Court’s order in *Adams v. DeWine*, and in compliance with all other applicable state and federal laws.

### **INTERROGATORY #4**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Senate President Huffman objects to this Interrogatory because it seeks information not within the personal knowledge of Senate President Huffman. This request is properly directed to Senator Sykes and/or Leader Russo.

**INTERROGATORY #5**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman does not recall when he first viewed the March 2 Plan, but refers Petitioners to documents produced contemporaneously showing email exchanges between Commission members and/or their staff regarding proposed congressional districting plans.

**INTERROGATORY #6**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that individuals involved in the creation of the 2022 Congressional Plan were instructed to comply with applicable state and federal law including the requirements of the Ohio Constitution, and the Court's order in *Adams v. DeWine*.

**INTERROGATORY #7**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman also objects to this Interrogatory to the extent that it seeks information beyond his personal knowledge. Senate President Huffman further objects to this Interrogatory to the extent it seeks a legal opinion or improper lay witness testimony. Subject to and without waiving these objections, Senate President Huffman states that the March 2 Congressional Plan was intentionally constructed to comply with the Court's order in *Adams v. DeWine*, and all applicable provisions of the Ohio Constitution.

### **INTERROGATORY #8**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent that it seeks information outside of his personal knowledge. Senate President Huffman further objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Senate President Huffman states that he and the individuals identified in Interrogatory No. 1 are current State employees and that some, like Ray DiRossi and Blake Springhetti, received a temporary increase in their regular state salaries to account for the increased time and demand on performing their jobs during legislative and congressional redistricting.

### **INTERROGATORY #9**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this Interrogatory is overly broad and unduly burdensome in that it is not limited to a relevant time frame, nor is it limited to relevant actors in this matter. Subject to and without waiving these objections, Senate President Huffman states that he communicated with Mr. Springhetti, members of his staff, Mr. DiRossi, Speaker Cupp, and members of the Ohio Redistricting Commission. Senate President Huffman further states that he discussed Congressional district plans at all Commission hearings identified in response to Interrogatory No. 12 and the members of the public that spoke at those hearings.

**INTERROGATORY #10**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #11**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #12**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this Interrogatory is overly broad and unduly burdensome in that it seeks identification of any meeting, for an entire year, where congressional redistricting was discussed. As such, this request is not narrowly tailored in time or scope to Petitioners' Complaint. Subject to and without waiving these objections, Senate President Huffman identifies the Ohio Redistricting Commission Committee meetings on February 22, 2022; February 23, 2022; February 24, 2022; March 1, 2022; March 2, 2022.

### **INTERROGATORY #13**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Senate President Huffman objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to his response to Interrogatory No. 1.

### **INTERROGATORY #14**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that all applicable state and federal law was consulted and adhered to in the drafting of the March 2 Congressional Plan. Senate President Huffman further states that maps were drawn and submitted on the Ohio Redistricting Commission Website. Senate President Huffman further refers Petitioners to documents produced contemporaneously with this request.

## **INTERROGATORY #15**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to this Interrogatory on the ground that “public release” is vague, and undefined. Senate President Huffman further objects that this request calls for information outside of his knowledge. Subject to and without waiving these objections Senate President Huffman refers Petitioners to his response to Interrogatory No. 1, detailing the individuals involved in drafting the 2022 Congressional Plan.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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*Counsel for Petitioners*

/s/ Phillip J. Strach

# **Neiman Petitioners' Exhibit 72**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**SENATE PRESIDENT HUFFMAN’S RESPONSES TO NEIMAN  
PETITIONERS’ FIRST SET OF REQUESTS FOR PRODUCTION**

Respondent Senate President Matthew Huffman (“Senate President Huffman”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

Senate President Huffman makes the following answers, responses, and objections to Petitioners’ First Set of Requests for Production of Documents (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Senate President Huffman’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Senate President Huffman gained in their capacity as such, and (b) a review of the documents and materials maintained by Senate President Huffman that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as

Senate President Huffman acquires additional information. Senate President Huffman states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Senate President Huffman responds or objects to any Requests should not be taken as an admission that Senate President Huffman accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Senate President Huffman responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Senate President Huffman of any part of any objection to any Requests. Senate President Huffman will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Senate President Huffman has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Senate President Huffman also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Senate President Huffman is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these

requests as written, call for Senate President Huffman to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Senate President Huffman has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan.

Senate President Huffman further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Senate President Huffman to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Senate President Huffman further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Senate President Huffman also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Senate President Huffman lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Senate President Huffman objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio General Assembly. Senate President Huffman further objects that this Request is overly broad and unduly burdensome in that it has no bearing on Petitioners' claims in this matter. The General Assembly did not pass a Congressional Plan and as a result, the Commission passed a Congressional Plan on March 2, 2022.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Senate President Huffman objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio Redistricting Commission. Senate President Huffman further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Senate President Huffman objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Senate President Huffman refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged documents being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Senate President Huffman objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio Redistricting Commission.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that he considered compliance to mean complying with all applicable state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* when instructing mapdrawers and when determining to vote for the Congressional Plan adopted on March 2, 2022. Senate President Huffman further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Request on the grounds that it is duplicative of Request number 6. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to his responses and objections to Request Number 6.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Senate President Huffman refers Petitioners to documents produced

contemporaneously with these requests and Senate President Huffman's response to Interrogatory No. 1.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Senate President Huffman objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this request is overly broad, unduly burdensome, and seeks information outside of Senate President Huffman's knowledge. The request seeks documents and information pertaining to meetings with any Ohio Redistricting Commission Members, regardless of whether Senate President Huffman was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Senate President Huffman can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that mapdrawers were instructed to comply with all applicable state and federal laws, and the Court's opinion in *Adams v. DeWine*. Senate President Huffman further states that no racial data was considered in drawing the Congressional Plan at issue in this action. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Senate President Huffman objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this request seeks information beyond his knowledge as he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Senate President Huffman states that he does not possess any such documents or contracts other than those for redistricting software and supplies as previously produced in *Bennett v. ORC*, 2021-1198.

13. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Senate President Huffman objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

14. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Senate President Huffman objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Senate President Huffman also objects that this request is not relevant, as Senate President Huffman's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Senate President Huffman objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Senate President

Huffman also objects that this request is not relevant, as even if Senate President Huffman had communications with these organizations, those communications would have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

16. All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

18. All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Senate President Huffman refers Petitioners to documents being produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that any communications or documents that merely

reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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*Counsel for Petitioners*

/s/ Phillip J. Strach

4865-1087-9772 v.1

# **Neiman Petitioners' Exhibit 73**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

*Petitioners,*

v.

Secretary of State Frank LaRose, *et al.*,

*Respondents.*

Case No. 2022-0298

Case No. 2022-0303

*Consolidated*

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

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**RESPONDENTS HUFFMAN AND CUPP’S OBJECTIONS AND RESPONSES TO  
PETITIONERS’ FIRST SET OF REQUESTS FOR PRODUCTION AND  
INTERROGATORIES TO RESPONDENTS**

Respondents Senate President Matthew Huffman (“President Huffman”) and House Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serve their objections and responses to Petitioners’ First Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

President Huffman and Speaker Cupp make the following answers, responses, and objections to Petitioners’ First Set of Requests for Production of Documents (“Requests”) and Interrogatories. Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on President Huffman and Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees

or agents of President Huffman and Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by President Huffman and Speaker Cupp that would be likely to contain the information called for by the Requests and Interrogatories. These responses are subject to amendment and supplementation as President Huffman and Speaker Cupp acquire additional information. President Huffman and Speaker Cupp state that these responses to the Requests and Interrogatories were prepared in consultation with their attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that President Huffman and Speaker Cupp respond or objects to any Requests or Interrogatories should not be taken as an admission that President Huffman and Speaker Cupp accept or admit the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that President Huffman and Speaker Cupp respond to part of or all of any Requests or Interrogatories is not intended to be, and shall not be construed as a waiver by President Huffman and Speaker Cupp of any part of any objection to any Requests or Interrogatories. President Huffman and Speaker Cupp will respond to Petitioners' requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, President Huffman and Speaker Cupp have interpreted each Request and Interrogatory to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client

privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

President Huffman and Speaker Cupp object to definition of “document” to the extent it includes TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

President Huffman and Speaker Cupp also object on the grounds that the time frame allowed for their responses are insufficient and these requests are premature.

President Huffman and Speaker Cupp further object to these Requests and Interrogatories to the extent that they are inconsistent with the Ohio Rules of Civil Procedure, are overly-broad and unduly burdensome in relation to the needs of this case.

These responses are provided solely for the purpose of and in relation to this action. Nothing in these responses is intended to waive any legislative privilege available to President Huffman and Speaker Cupp. Such legislative privilege is specifically reserved.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

#### **REQUEST NO. 1:**

All Supporting Data created, prepared, and/or utilized by Respondents’ Expert Witnesses in their analysis of the Second Plan and any Expert Report. This includes but is not limited to any data used to evaluate the Second Plan, any code for the base algorithm(s), the algorithm(s) used to create any simulated plans, backup data, and for each simulated map: the equivalent code, shapefile, or BAF file with data to the block or precinct level, to create copies of each simulated map.

**ANSWER:** President Huffman and Speaker Cupp object to this Request to the extent that it seeks information covered by the attorney-client, work product, or legislative privilege. President Huffman and Speaker Cupp further object to this Request to the extent that it is premature. Subject to and without waiving the foregoing objections, President Huffman and Speaker Cupp will supplement this response within a reasonable time once expert witnesses are retained.

## **REQUEST NO. 2:**

All Supporting Data created, prepared, and/or utilized by Respondents' Expert Witnesses in their analysis of the First Plan and any Expert Report. This includes but is not limited to any data used to evaluate the Second Plan, any code for the base algorithm(s), the algorithm(s) used to create any simulated plans, backup data, and for each simulated map: the equivalent code, shapefile, or BAF file with data to the block or precinct level, to create copies of each simulated map.

**ANSWER:** President Huffman and Speaker Cupp object to this Request to the extent that it seeks information covered by the attorney-client, work product, or legislative privilege. President Huffman and Speaker Cupp further object to this Request to the extent that it is premature. Subject to and without waiving the foregoing objections, President Huffman and Speaker Cupp will supplement this response within a reasonable time once expert witnesses are retained.

## **INTERROGATORIES**

### **INTERROGATORY NO. 1:**

Identify each individual retained by Respondents and/or their counsel for the purpose of providing expert evidence or an expert report in support of Respondents' merits brief in this matter.

**ANSWER:** President Huffman and Speaker Cupp object to this Request to the extent that it is premature. Subject to and without waiving the foregoing objection, President Huffman and Speaker Cupp will supplement this response within a reasonable time once expert witnesses are retained.

This the 4th day of April, 2022.

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4871-3902-9786 v.1

# **Neiman Petitioners' Exhibit 74**



## SOS Answers to Interrogatories Neiman and LWVO.pdf

DocVerify ID: B62F779A-E91F-4571-843C-F6794D5D16A1  
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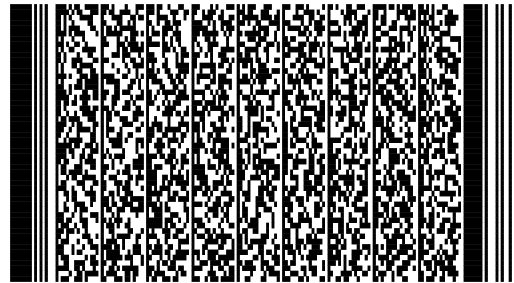
### E-Signature Summary

**E-Signature 1: D. Michael Grodhaus (DMG)**

April 19, 2022 11:34:57 -8:00 [E5542382F788] [156.63.71.253]  
mgrodhaus@ohiosos.gov (Principal) (Personally Known)

**E-Signature Notary: MacKenzie S. Clayton (msc)**

April 19, 2022 11:34:57 -8:00 [32F7EA452B71] [98.102.110.129]  
MacKenzie.Clayton@OhioAGO.gov  
I, MacKenzie S. Clayton, did witness the participants named above electronically sign this document.



IN THE SUPREME COURT OF OHIO

**Meryl Neiman, et al.,**

**League of Women Voters of Ohio, et al.,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, et al.,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

**RESPONDENT SECRETARY OF STATE FRANK LaROSE'S RESPONSES TO  
NEIMAN PETITIONERS' FIRST SET OF INTERROGATORIES AND LWVO  
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## **DEFINITIONS AND INSTRUCTIONS**

- A. Notwithstanding any definition set forth below, each word, term, or phrase used in these Interrogatories is intended to have the broadest meaning permitted under the Ohio Rules of Civil Procedure.
- B. Words or terms not specifically defined herein have the meaning commonly understood, and no definition is intended as exclusive.
- C. The following terms shall have the meanings indicated below:
- (1) The terms “Respondent,” “you,” and “your” shall mean: Secretary of State Frank LaRose individually, as a member of the Ohio Redistricting Commission, and in your capacity as Secretary of State, as well as your present and former agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, representatives, attorneys, and other persons or entities acting or purporting to act on your behalf.
  - (2) The term “Commission” shall mean the Ohio Redistricting Commission.
  - (3) The term “General Assembly” shall mean the Ohio General Assembly, including but not limited to the Ohio House of Representatives, the Ohio Senate, the Ohio Senate Local Government and Elections Committee, the Ohio House Government Oversight Committee, the Ohio General Assembly Joint Committee on Redistricting, and their respective members and staff.
  - (4) The term “March 2 Plan” shall mean the Congressional district plan adopted by the Ohio Redistricting Commission on March 2, 2022, or any drafts or precursors thereof, including the version of the plan presented by Senate President Matt Huffman to the Commission on March 1, 2022.
  - (5) The term “S.B. 237” shall mean the Congressional district plan proposed by Senator Vernon Sykes and Senator Kenny Yuko on February 8, 2022, or any subsequent amendments to that plan, or any drafts or precursors of that plan or its subsequent amendments, including the version proposed by Senator Sykes before the Commission on March 2, 2022.
  - (6) The term “Proposed Plans” shall mean all Congressional redistricting plans introduced by a member of the General Assembly or the Commission during 2022, including but not limited to the March 2 Plan or S.B. 237, as well as any drafts or precursors of those plans or subsequent amendments thereof.
  - (7) The term “map drawer” shall mean anyone who assisted in the creation of any Proposed Plan, regardless of whether or not they were compensated for their services.
  - (8) The term “Maptitude or other mapping software” means any and all digital programs



that may be used to assist in drawing Congressional districts, including but not limited to Maptitude, a software program created by Caliper Corporation.

- (9) The term “describe” shall mean to set forth fully and unambiguously every fact that relates to the answer called for by the Interrogatory of which you have knowledge and to identify each individual or entity with knowledge or information that relates to your answer, and when used in reference to a factual or legal contention, to describe the full factual and legal basis for the contention, and to identify any and all persons that you believe have knowledge about each such fact or document.
- (10) The term “person” shall mean and include natural persons, governmental entities, proprietorships, corporations, partnerships, joint ventures, and each other form of organization, entity, or association.
- (11) The term “identify” shall mean, with respect to any natural person, to state his or her full name, present or last known residential address, present or last known business address, and telephone number(s).
- (12) The term “identify” shall mean, with respect to any business organization, corporation or other legal entity, to state its full name, present or last known address, principal place of business, and telephone number.
- (13) The term “identify” shall mean, with respect to any document, to state the date of the document and the type of the document (e.g., letter, memorandum, telegram, chart, photograph, sound reproduction, etc.), to identify the person(s) who prepared the document, to identify any person(s) who signed the document, to identify any person(s) to whom the document was sent, to identify the present location and custodian of the document, and to describe the contents of the document.
- (14) The term “document” is used in the broadest possible sense and shall mean, without limitation, any kind of written, printed, recorded or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts and both sides of originals, copies and drafts, and including but not limited to papers, books, letters, correspondence, telegrams, cables, telex messages, text messages, electronic messages or electronic mail (whether or not stored or recorded on-line or off-line in archive storage), financial statements, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone conversations or other conversations, or of interviews, or of conferences or other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, expense account records, lists, tabulations, summaries, sound recordings, videotapes, word processing disks and/or memory or archive systems, computer disks and/or memory or archive systems, computer printouts, data processing input and output, magnetic tapes, magnetic disks, microfilms, all other records kept by electronic, magnetic, photographic, optical or mechanical means, and things similar to any of the foregoing, however denominated.



- (15) The term “communication” shall mean the transmission of any verbal or nonverbal, written or non-written message, information, sign, symbol, or behavior, and shall include the process by which such transmission occurs.
- (16) The terms “relating to” and “concerning” shall mean referring to, related to, regarding, consisting of, pertaining to, reflecting, evidencing, describing, constituting, or being in any way logically or factually connected with the matter discussed, including any connection, direct or indirect, whatsoever with the requested topic, without limitation, unless otherwise specified in the Request.
- D. Notwithstanding any of the provisions below, Respondents should not produce any documents or communications that are publicly available on the Commission’s official website.
- E. The following rules of construction apply to all Interrogatories:
- a. The terms “all” and “any” shall each be construed as encompassing any and all;
  - b. All uses of the word “each” include “every” (and vice versa);
  - c. The connective terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Interrogatories all responses that might otherwise be construed to be outside of its scope;
  - d. The term “including” shall be construed without limitation;
  - e. The use of a verb in any tense encompasses the use of the verb in all tenses;
  - f. References to agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, agents, representatives, attorneys, and other persons or entities acting or purporting to act on your behalf include both current and former agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, agents, representatives, attorneys, and other persons or entities acting or purporting to act on your behalf; and
  - g. References to any entity include all of that entity’s agents, assigns, employees, partners, successors, predecessors, associates, personnel, staff, officers, agents, representatives, attorneys, and other persons or entities acting or purporting to act on that entities’ behalf.
  - h. The singular number and masculine gender shall include, and be applied as, the plural or the feminine gender or neuter, and vice-versa, as the circumstances of the particular interrogatory may make appropriate.
- F. All interrogatories should be answered based on the knowledge of Respondents and/or



any of Respondent's attorneys, agents, and representatives.

- G. Where an interrogatory calls for the answer in more than one part, each part shall be separately answered so as to be fully understandable. If you object to any part of an interrogatory, answer all parts of such interrogatory as to which you do not object, and as to each part to which you do object, set forth the basis for the objection.
- H. If you object to the scope or time period of an interrogatory and refuse to answer for that scope or time period, please state your objection and answer the request for the scope or time period you believe is appropriate.
- I. If you object to any interrogatory as vague or unclear, assume a reasonable meaning, state what the assumed meaning is, and respond to the interrogatory according to the assumed meaning.
- J. If you object to any interrogatory as overbroad, provide a response that narrows the interrogatory in a way that eliminates the purported overbreadth, state the extent to which your response has narrowed the interrogatory, and respond to the narrowed interrogatory.
- K. If you withhold the answer to any part of any interrogatory on the claim of privilege, state the specific factual and legal basis for doing so and answer any part of the interrogatory that is not alleged to be objectionable. Such information should be supplied in sufficient detail to permit the Petitioners to assess the applicability of the privilege claimed.
- L. If you are unable to respond to any of the interrogatories fully and completely, after exercising due diligence to obtain the information necessary to provide a full and complete response, so state, and answer each such interrogatory to the fullest extent possible, specifying the extent of your knowledge and your inability to answer the remainder, and setting forth whatever information or knowledge you may have concerning the unanswered portions thereof and efforts you made to obtain the requested information.
- M. These interrogatories are continuing so as to require further and supplemental responses if Respondents receive or discover additional information between the time of original response and the time of any hearing, trial, or other presentation of evidence in this matter.



## **INTERROGATORIES**

### **INTERROGATORY #1**

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**OBJECTIONS:** Interrogatory No. 1 does not describe with reasonable particularity the meaning of the term “involved both formally and informally” and therefore it is overbroad, vague and not reasonably calculated to lead to the discovery of admissible evidence.

**ANSWER:** Without waiving the above referenced objections, the members of the Commission or their staff participated in meetings to discuss the content of a congressional district plan. Other than becoming aware in the days shortly before March 2, 2022, that Ray DiRossi was preparing a draft congressional district plan, Secretary LaRose does not possess any other information responsive to Interrogatory No. 1. By way of further answer, Secretary LaRose was not involved in the drawing of the Commission-approved March 2 Plan.

### **INTERROGATORY #2**

Describe the role played by any individuals identified in Interrogatory No. 1.

**OBJECTIONS:** Secretary LaRose restates his objections to Interrogatory No. 1 herein.

**ANSWER:** Without waiving the above referenced objections, please see Secretary LaRose’s Response to Interrogatory No. 1. Other than knowing that Ray DiRossi was preparing a draft congressional district plan, which became the Commission-approved March 2 Plan, Secretary LaRose does not possess information responsive to Interrogatory No. 2. By way of further answer, Secretary LaRose was not involved in the drawing of the Commission-approved March 2 Plan.



### **INTERROGATORY #3**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Secretary LaRose does not possess information responsive to Interrogatory No. 3. Secretary LaRose did not create, draw, or draft the March 2 Plan or any prior draft thereof. To the best of Secretary LaRose's knowledge, at least one draft congressional district plan was in the process of being created between February 26 and March 2. Further answering, the Secretary first received a copy of a draft congressional district plan from Ray DiRossi on March 1, 2022.

### **INTERROGATORY #4**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Secretary LaRose does not possess information responsive to Interrogatory No. 4. Further answering, Secretary LaRose did not create, draw, or draft the March 2 Plan or any prior draft thereof, and therefore Secretary LaRose would not possess information about when it was presented to Senator Vernon Sykes or his staff and/or Leader Allison Russo or her staff.

### **INTERROGATORY #5**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Secretary LaRose first viewed a working draft of a congressional district map on February 27, 2022, and first received a copy of a draft plan on March 1, 2022.

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## **INTERROGATORY #6**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**OBJECTION:** Interrogatory No. 6 is overly broad, unduly burdensome, and vague. Further, Interrogatory No. 6 seeks information not in Secretary LaRose's possession, custody, or control.

**ANSWER:** Without waiving the above referenced objections, Secretary LaRose did not create, draw, or draft any congressional district plan and did not give instructions regarding any proposed plan. Further answering, the Secretary expressed a desire that Summit County be kept whole and that the districts in northeast Ohio be compact. The Secretary does not possess information as to the instructions provided to individuals who created, or were involved in the creation of, any proposed plan.

## **INTERROGATORY #7**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**OBJECTION:** The Secretary of State objects to the extent that Interrogatory No. 7 seeks confidential, privileged information that was made during the deliberative process and/or is protected by the attorney client privilege. Interrogatory No. 7 does not identify or define with reasonable particularity "introduced to the Ohio Redistricting Commission," and therefore, it is overbroad, vague and not reasonably calculated to lead to the discovery of admissible evidence.



Finally, Interrogatory No. 7 seeks information not in the Secretary of State's possession, custody, or control.

**ANSWER:** Without waiving the above referenced privileges and objections, Secretary LaRose did not create, draw, or draft any congressional district plan and did not give instructions regarding any proposed plan. Secretary LaRose does not possess information as to the attempts made by those persons who created any proposed plan to comply with the listed sections of Article XIX of the Ohio Constitution.

### **INTERROGATORY #8**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Secretary LaRose does not possess any information as to the compensation for any services rendered in the creation of any congressional district plan considered or adopted in 2022. Further answering, all Commission members are elected officials and those officials, and their respective staff, are compensated by the State of Ohio for the performance of their official duties.

### **INTERROGATORY #9**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**OBJECTION:** Secretary LaRose objects to the extent that Interrogatory No. 9 seeks confidential, privileged information that was made during the deliberative process and/or is protected by the attorney client privilege. Further objecting, Interrogatory No. 9 is overly broad,



unduly burdensome, and vague, and not reasonably calculated to lead to the discovery of admissible evidence.

**ANSWER:** Secretary LaRose communicated with other Commission members and certain members of his own staff. Secretary LaRose cannot possibly identify every individual that he communicated with about any congressional district plans that were introduced or passed during 2022.

#### **INTERROGATORY #10**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Secretary LaRose did not create, draw, or draft any congressional district plan. Secretary LaRose does not possess information as to the data and information used during the process of drawing any such congressional district plans.

#### **INTERROGATORY #11**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Secretary LaRose did not create, draw, or draft any congressional district plan. Further answering, Secretary LaRose does not possess information responsive to Interrogatory No. 11.



## **INTERROGATORY #12**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**OBJECTION:** Secretary LaRose objects to the extent that Interrogatory No. 12 seeks confidential, privileged information that was made during the deliberative process and/or is protected by the attorney client privilege. Further objecting, Interrogatory No. 12 is overly broad, unduly burdensome, and vague, and not reasonably calculated to lead to the discovery of admissible evidence.

**ANSWER:** Without waiving the above referenced privileges and objections, Secretary LaRose and/or members of his staff attended meetings with Commission members and/or their staff on February 26, 2022, and February 27, 2022. Further answering, Secretary LaRose attended the formal meetings of the Commission.

## **INTERROGATORY #13**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Secretary LaRose did not create, draw, or draft any congressional district plan. Further answering, Secretary LaRose is aware that Ray DiRossi, Blake Springhetti, Randall Routt, and Chris Glassburn were involved in preparing proposed congressional district plans, but does not possess information as to the dates on which those plans were drafted, beyond that set forth in response to Interrogatory No. 3.



#### **INTERROGATORY #14**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Secretary LaRose did not create, draw, or draft any congressional district plan or provide give instructions for any proposed plan. Further answering, Secretary LaRose does not possess information responsive to Interrogatory No. 14.

#### **INTERROGATORY #15**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:** Secretary LaRose does not possess information responsive to Interrogatory No. 15.



**VERIFICATION**

**STATE OF OHIO**               :  
   :  
**COUNTY OF PERRY**       :  
   :

**SS.**

I, Michael Grodhaus, being first duly sworn, depose and say that the foregoing answers to the First Set of Interrogatories propounded by Petitioners are true and complete to the best of my knowledge, information, and belief.

**D. Michael Grodhaus**  
Signed on 2022/04/19 11:34:57 -8:00

Sworn to before me and subscribed in my presence this 19th day of April , 2022.



**MacKenzie S. Clayton**  
Signed on 2022/04/19 11:34:57 -8:00

Notary Public

COMMISSION  
EXPIRATION:



Respectfully submitted,

/s/ Julie M. Pfeiffer

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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served via email on April 19, 2022

upon the following:

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# **Neiman Petitioners' Exhibit 75**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**RESPONDENT SECRETARY OF STATE FRANK LaROSE’S RESPONSES TO  
NEIMAN PETITIONERS’ FIRST SET OF REQUESTS FOR PRODUCTION OF  
DOCUMENTS AND LWVO PETITIONERS’ SECOND SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

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Respondent Secretary of State Frank LaRose, in his official capacity as a Member of the Ohio Redistricting Commission, responds to Relators’ requests for production.

**GENERAL OBJECTIONS**

1. Respondent objects to the Requests to the extent they do not describe with reasonable particularity each item or category of items to be inspected as required by Rule 34 of the Ohio Rules of Civil Procedure.

2. Respondent objects to the Requests to the extent they are overly broad, unduly burdensome, vague, duplicative, not reasonably calculated to lead to the discovery of admissible evidence, and not proportional to the needs of the case.

3. Respondent objects to the Requests to the extent they seek information protected by the attorney-client privilege or work-product doctrine.

4. Respondent objects to the Requests to the extent they seek information protected by the deliberative process privilege.

5. Respondent objects to these Requests to the extent that they seek information not in Respondent's possession, custody, or control.

6. Respondent objects to the Requests to the extent that they seek information that is publicly available, already in Relators' possession, or in the possession or control of third parties.

7. Respondent objects to the Requests as confusing, ambiguous, or vague.

8. Respondent expressly reserves all objections as to competency, relevancy, materiality, and admissibility of the answers contained herein and any objections to future discovery Requests.

9. Respondent expressly reserves the right to alter, amend, revise, and/or supplement these responses. No response shall be construed as a waiver of any further objection.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

#### **NEIMAN REQUEST NO. 1/LWVO REQUEST NO. 3**

All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

#### **NEIMAN REQUEST NO. 2/LWVO REQUEST NO. 4**

All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

#### **NEIMAN REQUEST NO. 3/LWVO REQUEST NO. 5**

All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's

possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 4/LWVO REQUEST NO. 6**

All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 5/LWVO REQUEST NO. 7**

All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 6/LWVO REQUEST NO. 8**

All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 7/LWVO REQUEST NO. 9**

All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 8/LWVO REQUEST NO. 10**

All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 9/LWVO REQUEST NO. 11**

Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 10/LWVO REQUEST NO. 12**

All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 11/LWVO REQUEST NO. 13**

All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 12/LWVO REQUEST NO. 14**

All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff,

relating to any Proposed Plan.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 13/LWVO REQUEST NO. 15**

All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 14/LWVO REQUEST NO. 16**

All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 15/LWVO REQUEST NO. 17**

All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 16/LWVO REQUEST NO. 18**

All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 17/LWVO REQUEST NO. 19**

All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 18/LWVO REQUEST NO. 20**

All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 19/LWVO REQUEST NO. 21**

All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

**NEIMAN REQUEST NO. 20/LWVO REQUEST NO. 22**

Any and all expert report(s) or expert affidavit(s) prepared by your Expert Witness(es) concerning (a) the March 2 Plan or (b) any expert report or expert affidavit drafted by Dr. Imai or Dr. Warshaw.

**ANSWER:** Respondent incorporates all General Objections as if set forth herein. Subject to the foregoing objections, responsive, non-privileged documents, if any, in Respondent's possession, custody, or control have been produced.

Respectfully submitted,

DAVE YOST  
OHIO ATTORNEY GENERAL

*/s/ Julie M. Pfeiffer*

---

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*Counsel for Secretary of State Frank LaRose*

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via email on April 25, 2022, to the following:

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# **Neiman Petitioners' Exhibit 76**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**OHIO GOVERNOR MIKE DEWINE’S OBJECTIONS AND RESPONSES TO  
SUBPOENA DUCES TECUM**

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Ohio Governor Mike DeWine (“Governor DeWine”), by and through undersigned counsel, serves his objections and responses to Relators’ Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

Governor DeWine, a non-party to this action, makes the following answers, responses, and objections to Relators’ Subpoena Duces Tecum (“Requests”).<sup>1</sup> Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Governor DeWine’s present knowledge, information, and belief, as derived from a review of the documents and materials maintained by Governor DeWine that would be likely to contain the information called for by the Requests. These responses are

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<sup>1</sup> It is noted that the Neiman petitioners had represented to this court that no discovery was required “Petitioners do not believe discovery is necessary in this case, aside from expert disclosures, which under the proposed schedule Petitioners would submit with their merits brief”. “Petitioners motion for a scheduling order” Pg 6 filed March 21, 2022. However, they now seek non-party discovery.

subject to amendment and supplementation as Governor DeWine acquires additional information. Governor DeWine states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Governor DeWine responds or objects to any Requests should not be taken as an admission that Governor DeWine accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Governor DeWine responds to all or part of any Requests is not intended to be, and shall not be construed as a waiver by Governor DeWine of any part of any objection to any Requests. Governor DeWine will respond to Relators' requests in accordance with Rules 26 and 45 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Governor DeWine has interpreted each Request to call for discoverable matter only. To the extent any response or produced documents contains or refers to matters otherwise protected from discovery by the work product doctrine or the attorney-client privilege, or other applicable privilege no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Governor DeWine also objects on the grounds that the timeframe allowed for his response was insufficient to conduct the burdensome document search requested by Relators given the requests are overly broad, request information that is irrelevant, and are not reasonably limited in scope.

These responses are provided solely for the purpose of and in relation to this action.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. And the requests are overly broad, unduly burdensome, and seeks information outside of Governor DeWine's knowledge. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

2. All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. And the requests are overly broad, unduly burdensome, and seeks information outside of Governor DeWine's knowledge. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

3. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Governor DeWine refers Relators to documents produced contemporaneously with these responses.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:**

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Governor DeWine refers Relators to documents produced contemporaneously with these responses.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Governor DeWine refers Relators to documents produced contemporaneously with these responses.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Governor DeWine refers Relators to documents produced contemporaneously with these responses.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Governor DeWine further objects that this request is overly broad, unduly burdensome, and seeks information outside of Governor DeWine's knowledge. The request seeks documents and information pertaining to meetings with Commission members, regardless of whether Governor DeWine was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is beyond what Governor DeWine can provide.

11. All documents relating to information that was used to draw Congressional district maps

for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections. Governor DeWine refers Relators to documents produced contemporaneously with these responses.

12. All documents, including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Governor DeWine further objects that this request seeks information beyond his knowledge as he does not speak for the entire General Assembly or the Ohio Redistricting Commission. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

13. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Governor DeWine further objects that this request is overly broad and vague. Governor DeWine is himself a former member of the Ohio General Assembly. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

14. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator, including without limitation United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Governor DeWine further objects that this request is overly broad and vague. Governor DeWine further objects to the extent that this request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Governor DeWine also objects that this

request is not relevant, as Governor DeWine's communications with current or former members of the U.S. House of Representatives, U.S. Senate, or their staff, have no bearing on whether or not the 2022 Congressional district map violates the Ohio Constitution. Governor DeWine is himself a former member of both the U.S. House of Representatives and the U.S. Senate Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

15. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Governor DeWine further objects to the extent that this request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Governor DeWine also objects that this request is not relevant, as even if Governor DeWine had communications with these organizations, those communications have no bearing on whether or not the 2022 Congressional district map violates the Ohio Constitution. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

16. All documents relating to analysis conducted by you, any member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, or the Ohio Redistricting Commission or its staff regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege, and to the extent that it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

17. All documents regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

18. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio

Supreme Court thereof.

**ANSWER:** Governor DeWine objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Further this request is overly broad and vague and that this request is not relevant as to whether or not the 2022 Congressional district map violates the Ohio Constitution. Subject to and without waiving these objections, Governor DeWine refers Relators to documents produced contemporaneously with these responses.

Submitted this 19th day of April, 2022.

DAVE YOST  
OHIO ATTORNEY GENERAL

*/s/ Julie M. Pfeiffer*

---

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*Counsel of Record*

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*Counsel for Governor DeWine*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served via email on April 19, 2022

upon the following:

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# **Neiman Petitioners' Exhibit 77**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**AUDITOR OF STATE KEITH FABER’S OBJECTIONS AND RESPONSES TO  
SUBPOENA DUCES TECUM**

---

Auditor of State Keith Faber (“Auditor Faber”), by and through undersigned counsel, serves his objections and responses to *Neiman* and *LWVO* Relators’ Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

Auditor Faber makes the following answers, responses, and objections to Relators’ Subpoena Duces Tecum (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Auditor Faber’s present knowledge, information, and belief, as derived from a review of the documents and materials maintained by Auditor Faber that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Auditor Faber acquires additional information. Auditor Faber states that his responses to the Requests were prepared in consultation with his attorneys and may

not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Auditor Faber responds or objects to any Requests should not be taken as an admission that Auditor Faber accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Auditor Faber responds to all or part of any Requests is not intended to be, and shall not be construed as a waiver by Auditor Faber of any part of any objection to any Requests. Auditor Faber will respond to Relators' requests in accordance with Rules 26 and 45 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Auditor Faber has interpreted each Request to call for discoverable matter only. To the extent any response or produced documents contains or refers to matters otherwise protected from discovery by the work product doctrine or the attorney-client privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

These responses are provided solely for the purpose of and in relation to this action.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these

objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

2. All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

3. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Auditor Faber refers Relators to documents produced contemporaneously with these responses.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Auditor Faber refers Relators to documents produced contemporaneously with these responses.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Auditor Faber refers Relators to documents produced contemporaneously with these responses.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Auditor Faber refers Relators to documents produced contemporaneously with these responses.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Auditor Faber further objects that this request is overly broad, unduly burdensome, and seeks information outside of Auditor Faber's knowledge. The request seeks documents and information pertaining to meetings with Commission members, regardless of whether Auditor Faber was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is beyond what Auditor Faber can provide. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

11. All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these

objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

12. All documents, including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Auditor Faber further objects that this request seeks information beyond his knowledge as he does not speak for the entire General Assembly or the Ohio Redistricting Commission. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

13. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Auditor Faber further objects that this request is overly broad and vague. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

14. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator, including without limitation United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Auditor Faber further objects to the extent that this request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Auditor Faber also objects that this request is not relevant, as Auditor Faber's communications with current or former members of the U.S. House of Representatives, U.S. Senate, or their staff, have no bearing on whether or not the 2022 Congressional district map violates the Ohio Constitution. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

15. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Auditor Faber further objects to the extent that this request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Auditor Faber also objects that this request is not relevant, as even if Auditor Faber had communications with these organizations, those communications have no bearing on whether or not the 2022 Congressional district map violates the Ohio Constitution. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

16. All documents relating to analysis conducted by you, any member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, or the Ohio Redistricting Commission or its staff regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege, and to the extent that it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

17. All documents regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

18. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Auditor Faber objects to this Request to the extent it seeks information covered by the attorney-client privilege or work product privilege. Subject to and without waiving these objections, Auditor Faber refers Relators to documents produced contemporaneously with these responses.

Submitted this 19th day of April, 2022.

Respectfully submitted,

/s/ Julie M. Pfeiffer

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served via email on April 19, 2022

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*Counsel for League of Women Voters of  
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Respectfully submitted,

/s/ Julie M. Pfeiffer

JULIE M. PFEIFFER (0069762)

# **Neiman Petitioners' Exhibit 78**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**RAYMOND DIROSSI'S OBJECTIONS AND RESPONSES  
TO SUBPOENA DUCES TECUM**

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Raymond DiRossi ("Mr. DiRossi"), by and through undersigned counsel serves his objections and responses to Petitioners' Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

Mr. DiRossi makes the following answers, responses, and objections to Petitioners' Subpoena Duces Tecum ("Requests"). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Mr. DiRossi's present knowledge, information, and belief, as derived from: a review of the documents and materials maintained by Mr. DiRossi that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Mr. DiRossi acquires additional information. Mr. DiRossi states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this

litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Mr. DiRossi responds or objects to any Requests should not be taken as an admission that Mr. DiRossi accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Mr. DiRossi responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Mr. DiRossi of any part of any objection to any Requests. Mr. DiRossi will respond to Petitioners requests in accordance with Rules 26 and 45 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Mr. DiRossi has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Mr. DiRossi also objects that none of these Requests are limited to the relevant time frame in this action.

Mr. DiRossi further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Mr. DiRossi also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the

requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Mr. DiRossi lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Mr. DiRossi objects on the ground that this request seeks information outside of his knowledge. Mr. DiRossi is not a legislator, and does not speak for the entire Ohio General Assembly. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents being produced contemporaneously.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Mr. DiRossi objects on the ground that this request seeks information outside of his knowledge. Mr. DiRossi is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. DiRossi further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the Ohio Redistricting Commission's Hearings during the Congressional redistricting process.

**ANSWER:** Mr. DiRossi objects on the ground that this request seeks information outside of his knowledge. Mr. DiRossi is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. DiRossi further objects that information regarding the hearings is publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Mr. DiRossi objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Mr. DiRossi refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Mr. DiRossi is not a member of the Ohio Redistricting Commission, and he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents being produced contemporaneously.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi states that he considered compliance to mean complying with all state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* as instructed by Speaker Cupp. Mr. DiRossi further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi states that mapdrawers were instructed to comply with all state and federal laws. Mr. DiRossi further refers Petitioners to documents being produced contemporaneously.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Mr. DiRossi refers Petitioners to documents to being produced contemporaneously.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission

(or representatives thereof).

**ANSWER:** Mr. DiRossi objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects that this request is overly broad, unduly burdensome, and seeks information outside of Mr. DiRossi's knowledge. The request seeks documents and information pertaining to meetings with any Commission members, regardless of whether Mr. DiRossi was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Mr. DiRossi can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi states that mapdrawers were instructed to comply with all state and federal laws, and the Court's opinion in *Adams v. DeWine*. Mr. DiRossi further states that no racial data was considered in drawing the Congressional Plan adopted by the Commission on March 2, 2022. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects that this request seeks information beyond his knowledge as he does not speak for the entire Commission or the entire General Assembly. Subject to and without waiving these objections, Mr. DiRossi refers to documents or contracts previously produced in *Bennett v. ORC*, 2021-1198, and produced contemporaneously.

13. All communications with the Ohio Legislative Service Commission or any of its staff or directors relating to drawing any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to the extent this request seeks information covered by the legislative privilege or R.C. 101.30. Mr. DiRossi further objects that this Request is unduly broad and overly burdensome given that the Ohio Legislative Service Commission

had nothing to do with the drafting of the Congressional Plan challenged in this action, which was passed by the Commission, not the General Assembly.

14. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Mr. DiRossi objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Mr. DiRossi objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. DiRossi also objects that this request is not relevant, as Mr. DiRossi's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

16. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Mr. DiRossi objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. DiRossi also objects that this request is not relevant, as, even if Mr. DiRossi had communications with these organizations, those communications have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in the 2021 Congressional Plan.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

18. All documents and communications related to the Section 1(C)(3)(d) statement.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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*Counsel for Petitioners*

/s/ Phillip J. Strach

# **Neiman Petitioners' Exhibit 79**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

**v.**

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

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

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**BLAKE SPRINGHETTI'S OBJECTIONS AND RESPONSES  
TO SUBPOENA DUCES TECUM**

---

Blake Springhetti ("Mr. Springhetti"), by and through undersigned counsel serves his objections and responses to Petitioners' Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

Mr. Springhetti makes the following answers, responses, and objections to Petitioners' Subpoena Duces Tecum ("Requests"). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Mr. Springhetti's present knowledge, information, and belief, as derived from: a review of the documents and materials maintained by Mr. Springhetti that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Mr. Springhetti acquires additional information. Mr. Springhetti states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the

course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Mr. Springhetti responds or objects to any Requests should not be taken as an admission that Mr. Springhetti accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Mr. Springhetti responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Mr. Springhetti of any part of any objection to any Requests. Mr. Springhetti will respond to Petitioners requests in accordance with Rules 26 and 45 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Mr. Springhetti has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Mr. Springhetti also objects that none of these Requests are limited to the relevant time frame in this action.

Mr. Springhetti further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Mr. Springhetti also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the

requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Mr. Springhetti lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Mr. Springhetti objects on the ground that this request seeks information outside of his knowledge. Mr. Springhetti is not a legislator, and does not speak for the entire Ohio General Assembly. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Mr. Springhetti objects on the ground that this request seeks information outside of his knowledge. Mr. Springhetti is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. Springhetti further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the Ohio Redistricting Commission's Hearings during the Congressional redistricting process.

**ANSWER:** Mr. Springhetti objects on the ground that this request seeks information outside of his knowledge. Mr. Springhetti is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. Springhetti further objects that information regarding the hearings is publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Mr. Springhetti objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Mr. Springhetti refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Mr. Springhetti is not a member of the Ohio Redistricting Commission, and he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti states that he considered compliance to mean complying with all state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* as instructed by Speaker Cupp. Mr. Springhetti further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti states that mapdrawers were instructed to comply with all state and federal laws. Mr. Springhetti further refers Petitioners to documents being produced contemporaneously.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission

(or representatives thereof).

**ANSWER:** Mr. Springhetti objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects that this request is overly broad, unduly burdensome, and seeks information outside of Mr. Springhetti's knowledge. The request seeks documents and information pertaining to meetings with any Commission members, regardless of whether Mr. Springhetti was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Mr. Springhetti can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti states that mapdrawers were instructed to comply with all state and federal laws, and the Court's opinion in *Adams v. DeWine*. Mr. Springhetti further states that no racial data was considered in drawing the Congressional Plan adopted by the Commission on March 2, 2022. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects that this request seeks information beyond his knowledge as he does not speak for the entire Commission or the entire General Assembly. Subject to and without waiving these objections, Mr. Springhetti refers to documents or contracts previously produced in *Bennett v. ORC*, 2021-1198, and produced contemporaneously.

13. All communications with the Ohio Legislative Service Commission or any of its staff or directors relating to drawing any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to the extent this request seeks information covered by the legislative privilege or R.C. 101.30. Mr. Springhetti further objects that this Request is unduly broad and overly burdensome given that the Ohio Legislative Service Commission

had nothing to do with the drafting of the Congressional Plan challenged in this action, which was passed by the Commission, not the General Assembly.

14. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Mr. Springhetti objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Mr. Springhetti objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. Springhetti also objects that this request is not relevant, as Mr. Springhetti's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

16. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Mr. Springhetti objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. Springhetti also objects that this request is not relevant, as, even if Mr. Springhetti had communications with these organizations, those communications have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in the 2021 Congressional Plan.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

18. All documents and communications related to the Section 1(C)(3)(d) statement.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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