

IN THE SUPREME COURT OF OHIO

**Bria Bennett, et al.,**

**Relators,**

**v.**

**Ohio Redistricting Commission, et al.,**

**Respondents.**

**Case No. 2021-1198**

Original Action Filed Pursuant to Ohio  
Constitution, Article XI, Section 9(A)

*[Apportionment Case Pursuant to S. Ct.  
Prac. R. 14.03]*

**RELATORS' MOTION FOR ORAL ARGUMENT**

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Pursuant to S.Ct.Prac.R. 14.03(C)(2) and 17.02, Relators Bria Bennett *et al.* respectfully move for oral argument before the Court on the merits of their challenge to the apportionment plan for General Assembly districts (the “2021 Plan”) adopted by the Ohio Redistricting Commission (the “Commission”) on September 16, 2021.

Oral argument should be held in this apportionment challenge because the question presented—whether the 2021 Plan complies with the recently overhauled constitutional process for drawing state legislative districts—is a matter of great public importance, involves a substantial constitutional issue, and involves complex issues of law and fact. Indeed, this action, along with two other apportionment challenges that were filed around the same time, *League of Women Voters of Ohio v. Ohio Redistricting Comm.*, Case No. 2021-1193 and *Ohio Organizing Collaborative v. Ohio Redistricting Comm.*, Case No. 2021-1210, will be the Court’s first opportunity to interpret the new redistricting process set forth in Article XI of the Ohio Constitution, and the Court’s ruling will no doubt greatly influence the redistricting process for decades to come. Given the great importance of the matter, the Court would benefit from the fullest opportunity to ask questions of the parties’ legal counsel. Redistricting cases by their nature also involve complex questions of law and fact, as demonstrated by the large amounts of evidence submitted by the Relators in all three cases and the substantive arguments related to the proper interpretation and application of newly mandated constitutional requirements.

Furthermore, although the Court already scheduled oral argument in the *League of Women Voters* case, *see 09/29/2021 Case Announcements #2*, 2021-Ohio-3424 (scheduling oral argument for December 8, 2021), which includes common claims, the relators in that action have offered their own expert reports and may offer different legal perspectives than the *Bennett* Relators are

presenting in their case. As a result, it cannot be presumed that the *Bennett* Relators' position will be presented and defended during oral argument in the *League of Women Voters* case.

For all these reasons, the *Bennett* Relators respectfully request the Court to schedule oral argument in this action.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Oral Argument was sent via email this 29<sup>th</sup> day of October, 2021 to the following:

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