

IN THE SUPREME COURT OF OHIO

<b>The Ohio Organizing Collaborative, et al.,:</b>	:	<b>Case No. 2021-1210</b>
<b>Relators,</b>	:	
v.	:	<b>Original Action Filed Pursuant to Ohio</b>
	:	<b>Constitution, Article XI, Section 9(A)</b>
<b>Ohio Redistricting</b>	:	
<b>Commission, et al.,</b>	:	<b>[Apportionment Case Pursuant to S. Ct.</b>
	:	<b>Prac. R. 14.03]</b>
<b>Respondents.</b>	:	
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**RESPONDENTS SENATOR VERNON SYKES' AND HOUSE MINORITY LEADER EMILIA SYKES' RESPONSE TO RELATORS' MOTION FOR ORAL ARGUMENT**

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For the reasons stated more fully below, Respondents Senator Vernon Sykes (“Senator Sykes”) and House Minority Leader Emilia Sykes (“Leader Sykes”) do not oppose Relators’ motion for oral argument and likewise request additional time separate and distinct from the other Respondents and Relators in which to argue their unique position.

Respectfully submitted,

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*/s/ Diane Menashe*

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## MEMORANDUM IN SUPPORT

Senator Sykes and Leader Sykes do not oppose Relators' motion for oral argument in this case. As highlighted in their motion, their case involves a matter of great public importance, involves complex issues of law and fact, and raises substantial constitutional issues that must be addressed. This Court and the public would benefit from hearing their unique perspective.

Likewise, Senator Sykes and Leader Sykes agree with the other Respondents that consolidation of these arguments would be beneficial given the time-constraints posed by these lawsuits. Senator Sykes and Leader Sykes have no opinion as to the total time that should be allotted to each side.

However, Senator Sykes and Leader Sykes respectfully request that they receive fifteen (15) minutes at oral argument separate and distinct from either the Relators or other Respondents, given the unique position in which they are situated in this lawsuit. As Co-Sponsor of the Joint Resolution proposing the Article XI Amendment, and Co-Chair of the Fair Districts Campaign, and the Redistricting Commission, Senator Sykes has a unique perspective and argument separate from the Relators. Likewise, Leader Sykes, as Co-Chair of the Legislative Task Force on Redistricting, Reapportionment, and Demographic Research also brings a different perspective from the Relators. And as Democratic Commissioners from the minority party, their perspectives and arguments as to the Commission process are distinct and in contrast to other Commission Members. They are not easily "aligned" with either side, but rather, have their own arguments to present to the Court for consideration.

Accordingly, whether the Court grants Relators' motion for oral argument, consolidates the arguments for consideration, or denies the request, Senator Sykes and Leader Sykes request fifteen (15) minutes in which to present their position to the Court.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2021, a copy of the foregoing Respondents Senator Vernon Sykes' and House Minority Leader Emilia Sykes' Response to Relators' Motion to for Oral Argument was filed electronically and sent via email to the following:

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