

IN THE SUPREME COURT OF OHIO

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| Bria Bennett, et al., | : | |
| | : | Case No. 2021-1198 |
| Relators, | : | |
| v. | : | Original Action Filed Pursuant to Ohio |
| | : | Constitution, Article XI, Section 9(A) |
| Ohio Redistricting | : | |
| Commission, et al., | : | [Apportionment Case Pursuant to S. Ct. |
| | : | Prac. R. 14.03] |
| Respondents. | : | |
| | : | |
| | : | |
| | : | |

RESPONDENTS SENATOR VERNON SYKES' AND HOUSE MINORITY LEADER EMILIA SYKES' RESPONSE TO RELATORS' MOTION FOR ORAL ARGUMENT

Freda Levenson
flevenson@acluohio.org
David J. Carey
dcarey@acluohio.org
Alora Thomas
athomas@aclu.org
Julie A. Epstein
jepstein@aclu.org

Robert D. Fram
rfram@cov.com
Joshua Gonzalez
jgonzalez@cov.com
Megan C. Keenan
Mkeenana@cov.com
Anupam Sharma
asharma@cov.com
Madison Arent
marent@cov.com

Laura B. Bender
David Denuyl
Yiye Fu
Juliana Goldrosen
James Hovard

Erik Clark
ejclark@organlegal.com
Ashley Merino
amerino@organlegal.com

*Counsel for Respondent Ohio
Redistricting Commission*

Bridget Coontz
Bridget.Coontz@ohioAGO.gov
Julie Pfeiffer
Julie.Pfeiffer@ohioAGO.gov
Michael K. Hendershot
Michael A. Walton
Michael.walton@ohioago.gov
David Anthony Yost

*Counsel for Respondents Ohio
Governor Mike DeWine, Ohio
Secretary of State Frank LaRose,
and Ohio Auditor Keith Faber*

Peter M. Ellis
pellis@reedsmith.com
M. Patrick Yingling

Alexander Thomson

Counsel for LWVO Relators

Abha Khanna
Ben Stafford
Elias Law Group
1700 Seventh Avenue, Suite 200
Seattle, WA 9801
akhanna@elias.law
bstafford@elias.law

Aria C. Branch
Jyoti Jasrasaria
Spencer W. Klein
Elias Law Group
10 G. Street NE, Suite 600
Washington, DC 20002
abranh@elias.law
jjasrasaria@elias.law
sklein@elias.law

Donald J. McTigue
Derek S. Clinger
McTigue & Colombo LLC
545 East Town Street
Columbus, OH 43215
dmctigue@electionlawgroup.com
dclinger@electionlawgroup.com

William Stuart Dornette
dornette@taftlaw.com
John Branch
John.branch@nelsonmullins.com
Beth Anne Bryan
bryan@taftlaw.com
Thomas Farr
Tom.farr@nelsonmullins.com
Alyssa Riggins
Alyssa.riggins@nelsonmullins.com
Phillip Strach
Phillip.strach@nelsonmullins.com
Philip Daniel Williamson
pwilliamson@taftlaw.com

Counsel for Bria Bennett Relators

MPYingling@ReedSmith.com

Natalie R. Salazar
NSalazar@reedsmith.com
Brian A. Sutherland
bsutherland@reedsmith.com
Ben R. Fliegel*
bfliegel@reedsmith.com

Alicia L. Bannon
Alicia.bannon@nyu.edu
Yurji Rudensky
rudensky@brennan.law.nyu.edu
Ethan Herenstein
herensteine@brennan.law.nyu.edu

Brad Funari
Michael Li
Natalie R. Stewart

Attorneys for OOC Relators

Diane Menashe (0070305)*
*Counsel of Record
John Gilligan (0024542)
ICE MILLER LLP
250 West Street, Suite 700
Columbus, Ohio 43215
T: (614) 462-6500
F: (614) 222-3468
Diane.Menashe@icemiller.com
John.Gilligan@icemiller.com

*Counsel for Respondents Senator
Vernon Sykes and House Minority
Leader Emilia Sykes*

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,

ICE MILLER LLP

/s/ Diane Menashe

Diane Menashe (0070305)
Counsel to the Ohio Attorney
General

John Gilligan (0024542)
ICE MILLER LLP
250 West Street, Suite 700
Columbus, Ohio 43215
Diane.Menashe@icemiller.com
John.Gilligan@icemiller.com
T: (614) 462-6500
F: (614) 222-3468

*Counsel for Respondents Senator
Vernon Sykes and House Minority
Leader Emilia Sykes*

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,

ICE MILLER LLP

/s/ Diane Menashe

Diane Menashe (0070305)
Counsel to the Ohio Attorney
General

John Gilligan (0024542)
ICE MILLER LLP
250 West Street, Suite 700
Columbus, Ohio 43215
Diane.Menashe@icemiller.com
John.Gilligan@icemiller.com
T: (614) 462-6500
F: (614) 222-3468

*Counsel for Respondents Senator
Vernon Sykes and House Minority
Leader Emilia Sykes*

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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:

Freda Levenson
flevenson@acluohio.org
David J. Carey
dcarey@acluohio.org
Alora Thomas
athomas@aclu.org
Julie A. Epstein
jepstein@aclu.org

Robert D. Fram
rfram@cov.com
Joshua Gonzalez
jgonzalez@cov.com
Megan C. Keenan
mkeenan@cov.com
Anupam Sharma
asharma@cov.com
Madison Arent
marent@cov.com

Laura B. Bender
David Denuyl
Yiye Fu
Juliana Goldrosen
James Hovard
Alexander Thomson

Counsel for LWVO Relators

Abha Khanna
Ben Stafford
Elias Law Group
1700 Seventh Avenue, Suite 200
Seattle, WA 9801
akhanna@elias.law
bstafford@elias.law

Aria C. Branch

Erik Clark
ejclark@organlegal.com
Ashley Merino
amerino@organlegal.com

*Counsel for Respondent Ohio
Redistricting Commission*

Bridget Coontz
Bridget.Coontz@ohioAGO.gov
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Governor Mike DeWine, Ohio
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and Ohio Auditor Keith Faber*

Peter M. Ellis
pellis@reedsmith.com
M. Patrick Yingling
MPYingling@ReedSmith.com
Natalie R. Salazar
NSalazar@reedsmith.com
Brian A. Sutherland
bsutherland@reedsmith.com
Ben R. Fliegel*
bfliegel@reedsmith.com

Alicia L. Bannon
Alicia.bannon@nyu.edu
Yurji Rudensky
rudensky@brennan.law.nyu.edu
Ethan Herenstein

Jyoti Jasrasaria
Spencer W. Klein
Elias Law Group
10 G. Street NE, Suite 600
Washington, DC 20002
abranh@elias.law
jjasrasaria@elias.law
sklein@elias.law

herensteine@brennan.law.nyu.edu

Brad Funari
Michael Li
Natalie R. Stewart

Attorneys for OOC Relators

Donald J. McTigue
Derek S. Clinger
McTigue & Colombo LLC
545 East Town Street
Columbus, OH 43215
dmctigue@electionlawgroup.com
dclinger@electionlawgroup.com

William Stuart Dornette
dornette@taftlaw.com
John Branch
John.branch@nelsonmullins.com
Beth Anne Bryan
bryan@taftlaw.com
Thomas Farr
Tom.farr@nelsonmullins.com
Alyssa Riggins
Alyssa.riggins@nelsonmullins.com
Phillip Strach
Phillip.strach@nelsonmullins.com
Philip Daniel Williamson
pwilliamson@taftlaw.com

Counsel for Bria Bennett Relators

/s/ Diane Menashe
Diane Menashe (0070305)