

IN THE SUPREME COURT OF OHIO

**Regina C. Adams, et al.,**

*Relators,*

*v.*

**Governor Mike DeWine, et al.,**

*Respondents.*

**Case No. 2021-1428**

**Original Action Filed Pursuant to  
Ohio Const., Art. XIX, Sec. 3(A)**

SUPPLEMENT TO RELATORS' MERITS BRIEF

Abha Khanna (PHV 2189-2021)

Ben Stafford (PHV 25433-2021)

ELIAS LAW GROUP, LLP

1700 Seventh Ave., Suite 2100

Seattle, WA 98101

(206) 656-0176

akhanna@elias.law

Aria C. Branch (PHV 25435-2021)

Jyoti Jasrasaria (PHV 25401-2021)

Spencer W. Klein (PHV 25432-2021)

Harleen K. Gambhir (PHV 25587-2021)

ELIAS LAW GROUP, LLP

10 G St. NE, Suite 600

Washington, DC 20002

(202) 968-4490

abranch@elias.law

Donald J. McTigue (0022849)

*Counsel of Record*

Derek S. Clinger (0092075)

MCTIGUE & COLOMBO, LLC

545 East Town Street

Columbus, OH 43215

(614) 263-7000

dmctigue@electionlawgroup.com

*Counsel for Adams Relators*

Dave Yost

OHIO ATTORNEY GENERAL

Bridget C. Coontz (0072919)

Julie M. Pfeiffer (0069762)

Michael A. Walton (0092201)

Assistant Attorneys General  
Constitutional Offices Section

30 E. Broad Street, 16th Floor

Columbus, OH 43215

(614) 466-2872

bridget.coontz@ohioago.gov

*Counsel for Respondent Ohio Secretary of State  
Frank LaRose*

Phillip J. Strach (PHV 25444-2021)

Thomas A. Farr (PHV 25461-2021)

John E. Branch, III (PHV 25460-2021)

Alyssa M. Riggins (PHV 25441-2021)

NELSON MULLINS RILEY & SCARBOROUGH, LLP

4140 Parklake Ave., Suite 200

Raleigh, NC 27612

(919) 329-3812

phil.strach@nelsonmullins.com

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

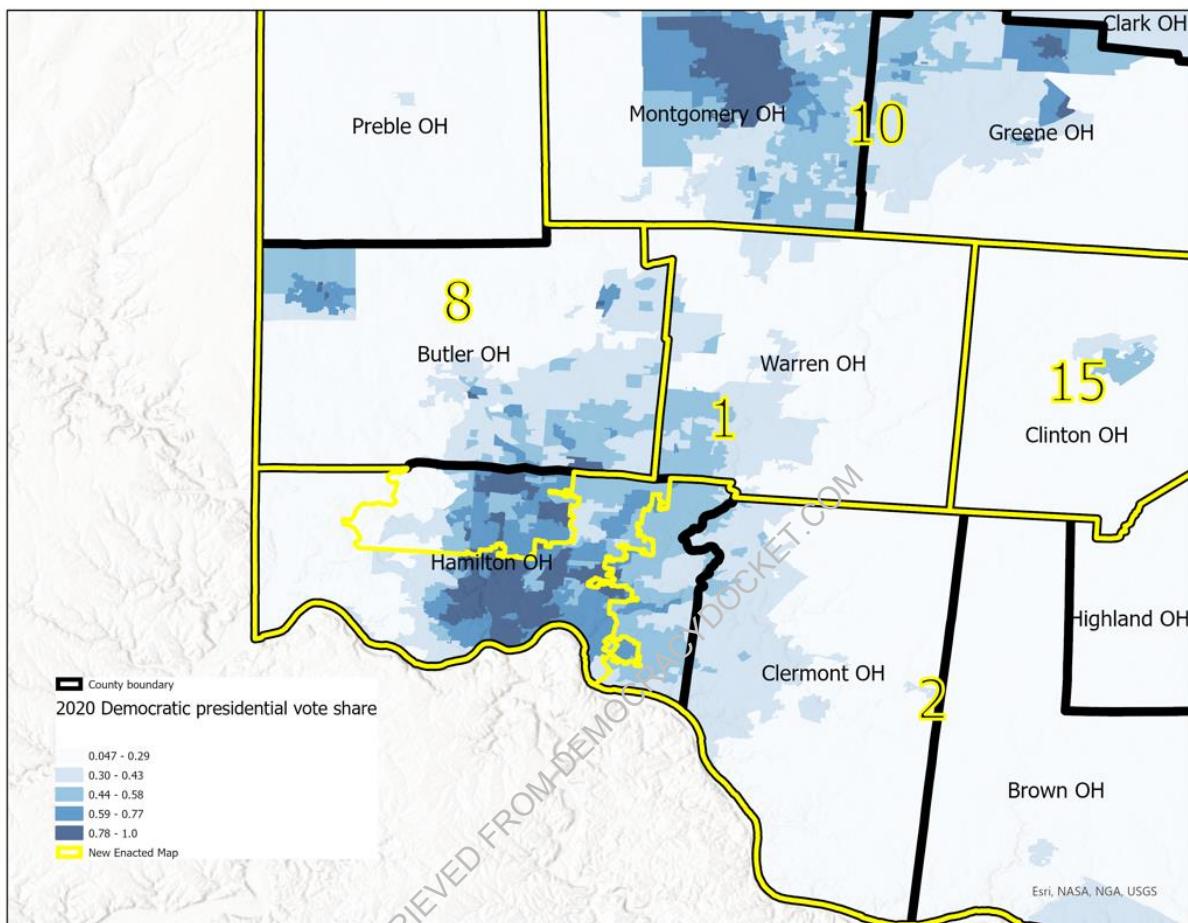
## **RELATORS' SUPPLEMENT**

### **Table of Contents**

Partisanship and the Enacted Plan's Districts, Hamilton County and Surroundings (Figure 9, Rodden Aff. at p. 31).....	1
Race and the Enacted Plan's Districts, Hamilton County and Surroundings (Figure 10, Rodden Aff. at p. 32) .....	2
Cincinnati, College Hill Area (Figure 11, Rodden Aff. at p. 33).....	3
Partisanship and Districts of Alternative Plans, Hamilton County and Surroundings (Figure 12, Rodden Aff. at p. 34).....	4
Partisanship and Enacted Districts, Columbus and Surroundings (Figure 14, Rodden Aff. at p. 36).....	5
Partisanship and Enacted and Alternative Districts, Columbus and Surroundings (Figure 15, Rodden Aff. at p. 37).....	6
The Boundary of the City of Columbus & Boundaries of the Enacted Plan and Alternative Plans (Figure 16, Rodden Aff. at p. 38).....	7
The Boundary of the Communities of the City of Columbus & Boundaries of the Enacted Plan (Figure 17, Rodden Aff. at p. 39).....	8
The Boundary of the Communities of the City of Columbus & Boundaries of Alternative Plans (Figure 18, Rodden Aff. at p. 40).....	9
Partisanship and the Boundaries of the Enacted Plan, Northeast Ohio (Figure 19, Rodden Aff. at p. 41).....	10
Partisanship and the Boundaries of the Enacted and Alternative Plans, Northeast Ohio (Figure 20, Rodden Aff. at p. 42).....	11
The Cuyahoga Corridor (Figure 21, Rodden Aff. at p. 43).....	12
Partisanship and the Boundaries of the Enacted and Alternative Plans, Northwest Ohio (Figure 22, Rodden Aff. at p. 44).....	13

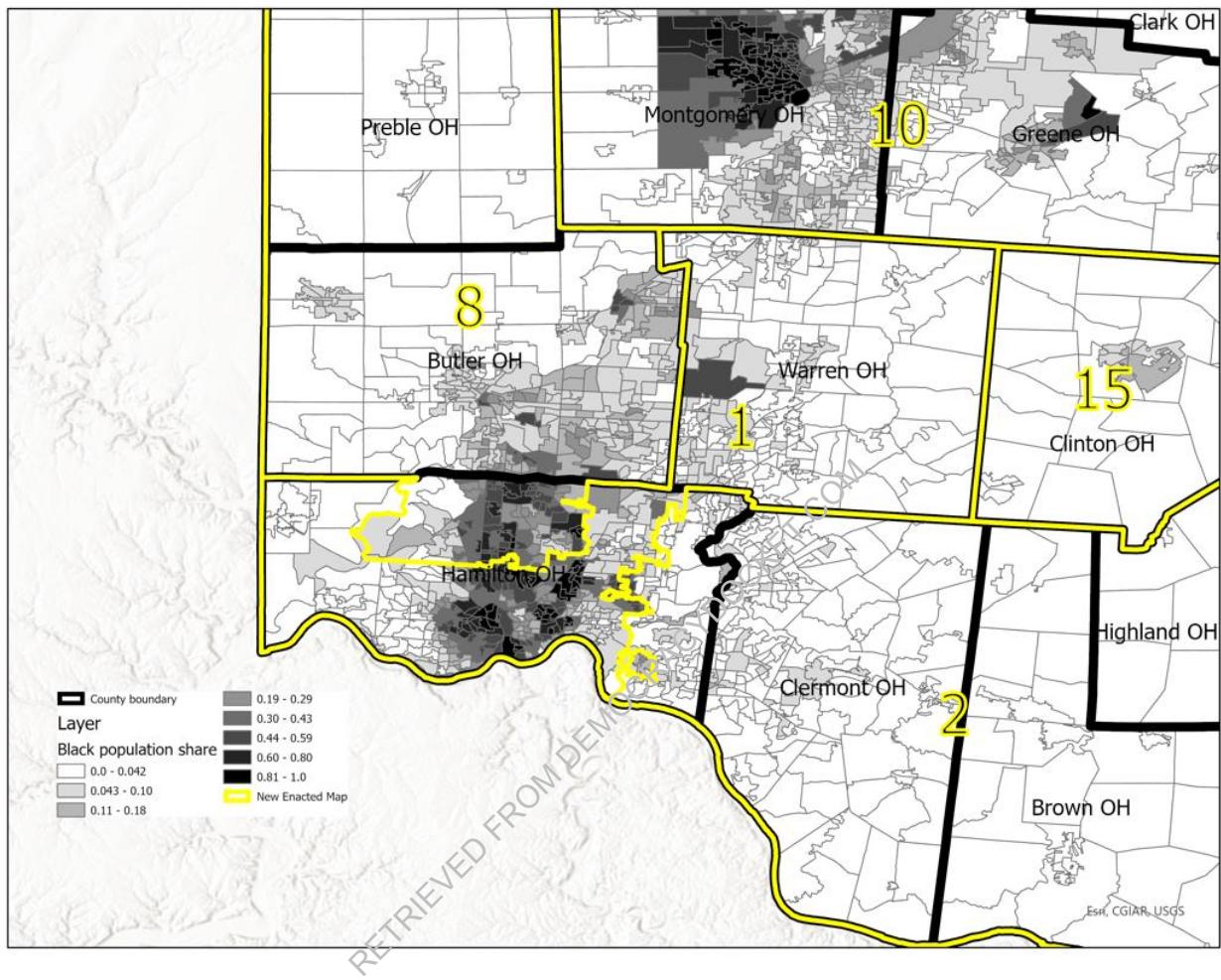
## Partisanship and the Enacted Plan's Districts, Hamilton County and Surroundings

(Figure 9, Rodden Aff. at p. 31)



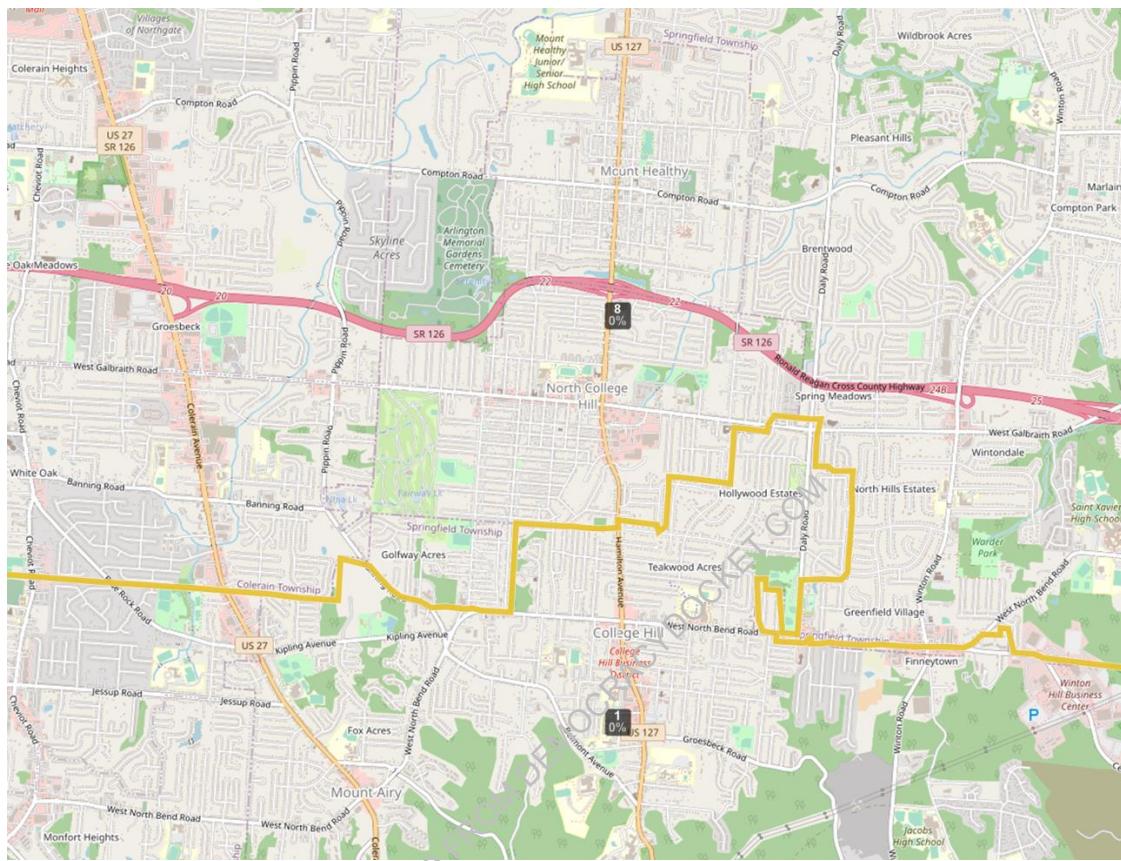
## Race and the Enacted Plan's Districts, Hamilton County and Surroundings

(Figure 10, Rodden Aff. at p. 32)



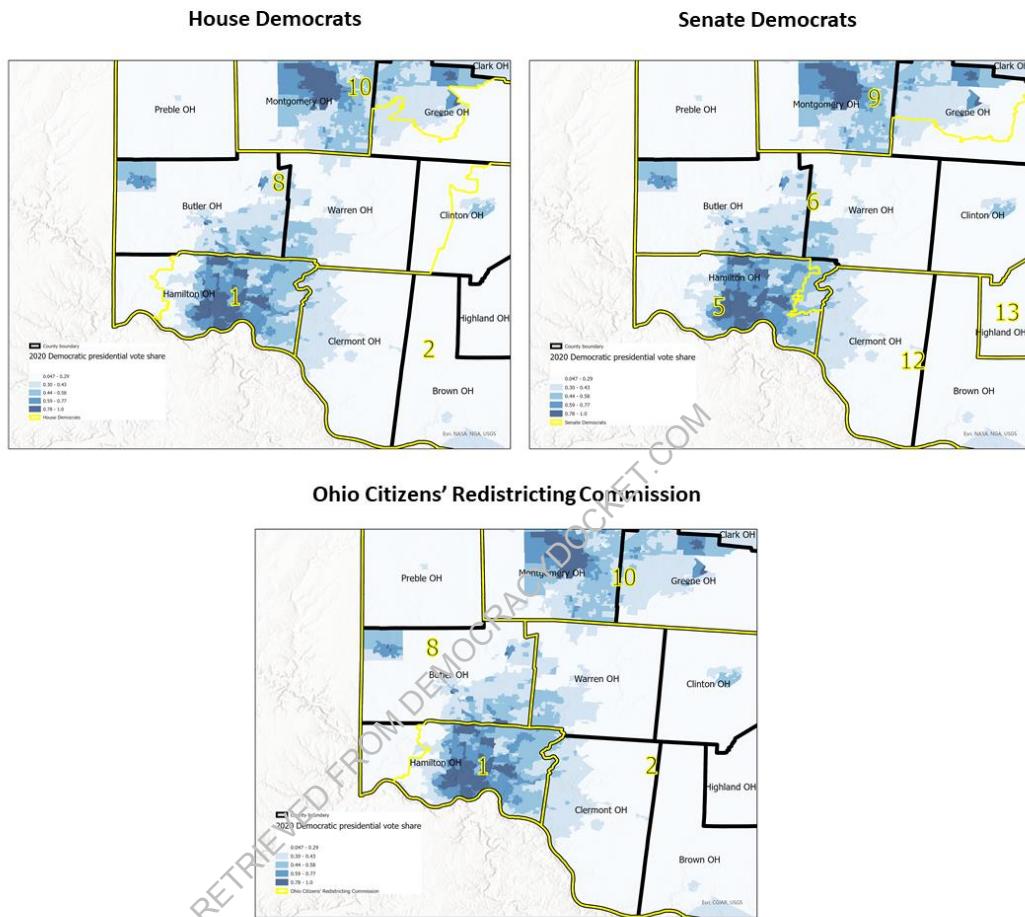
## Cincinnati, College Hill Area

(Figure 11, Rodden Aff. at p. 33)



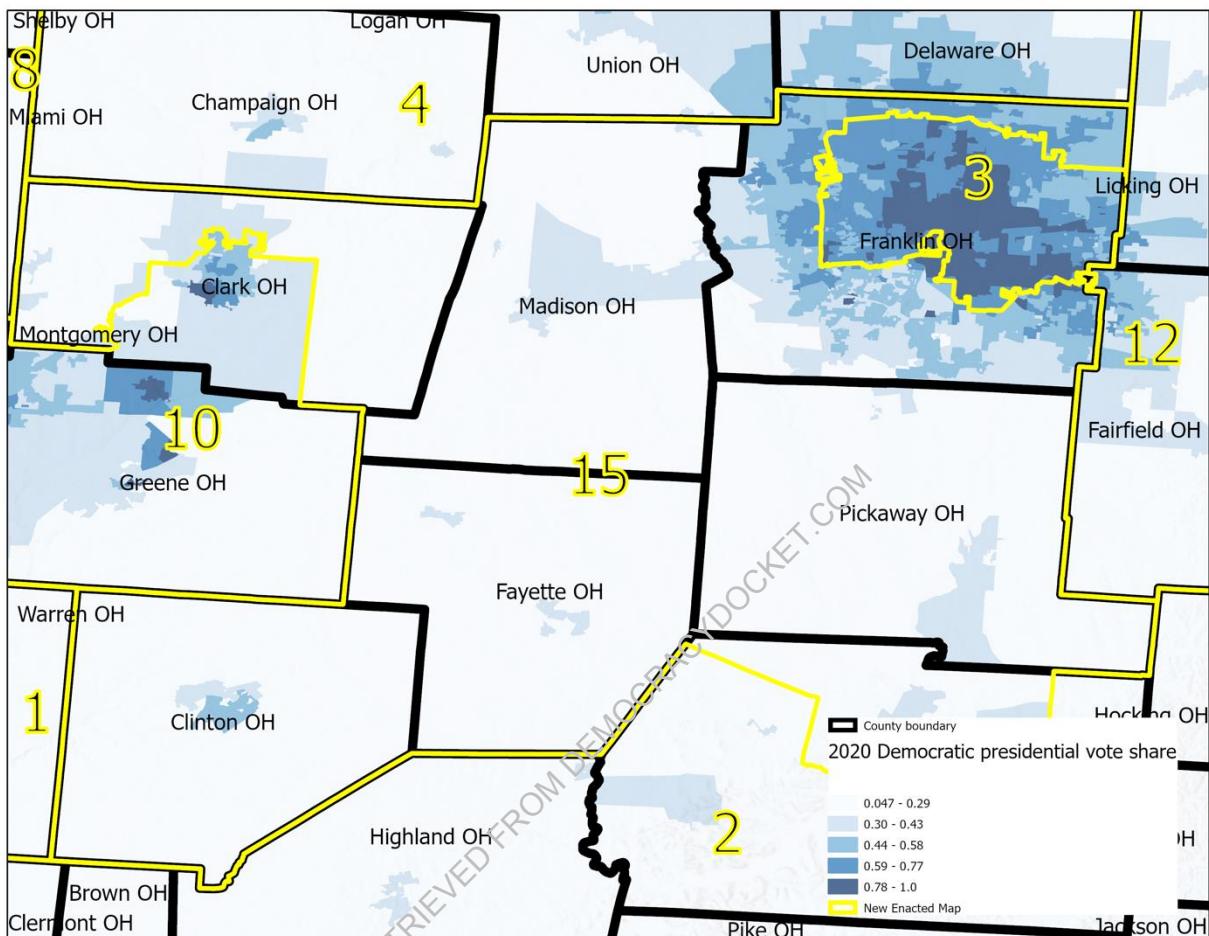
## Partisanship and Districts of Alternative Plans, Hamilton County and Surroundings

(Figure 12, Rodden Aff. at p. 34)



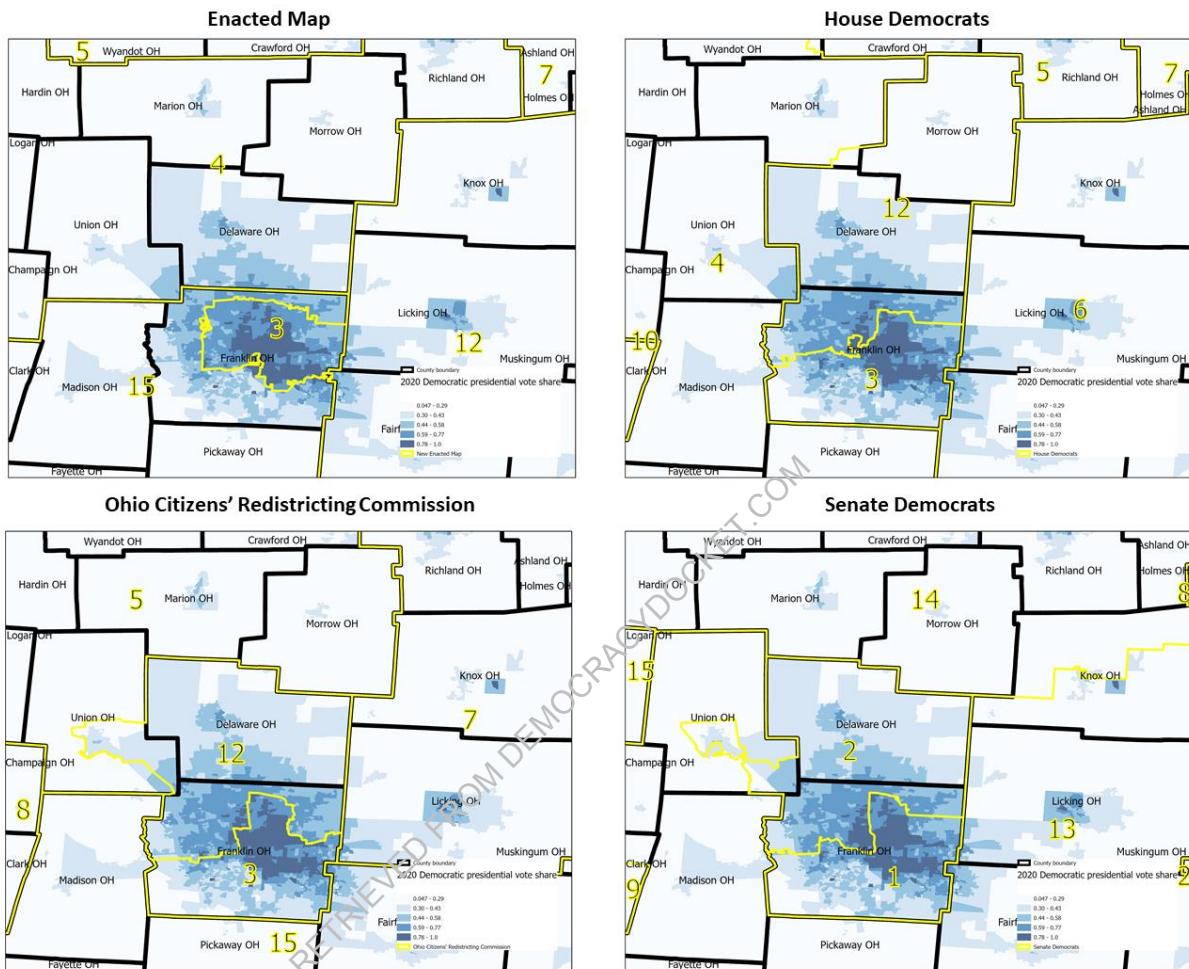
## Partisanship and Enacted Districts, Columbus and Surroundings

(Figure 14, Rodden Aff. at p. 36)



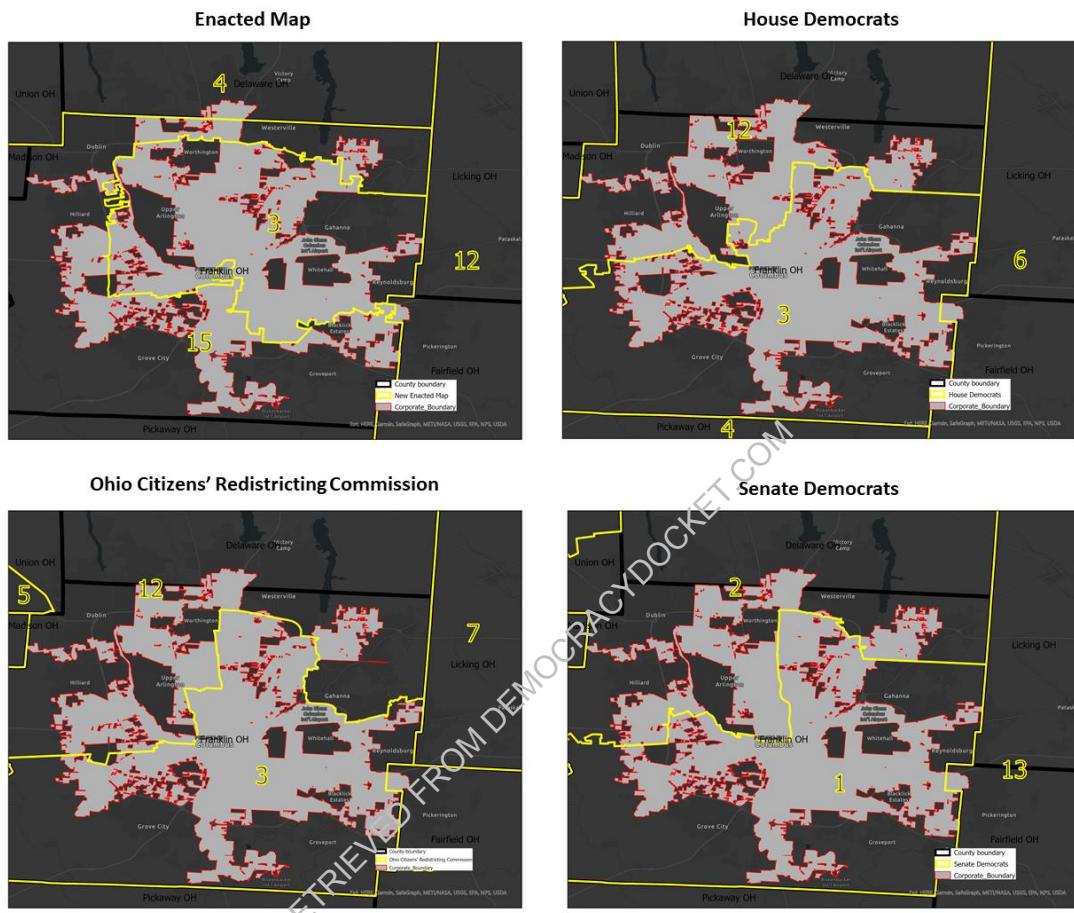
## Partisanship and Enacted and Alternative Districts, Columbus and Surroundings

(Figure 15, Rodden Aff. at p. 37)



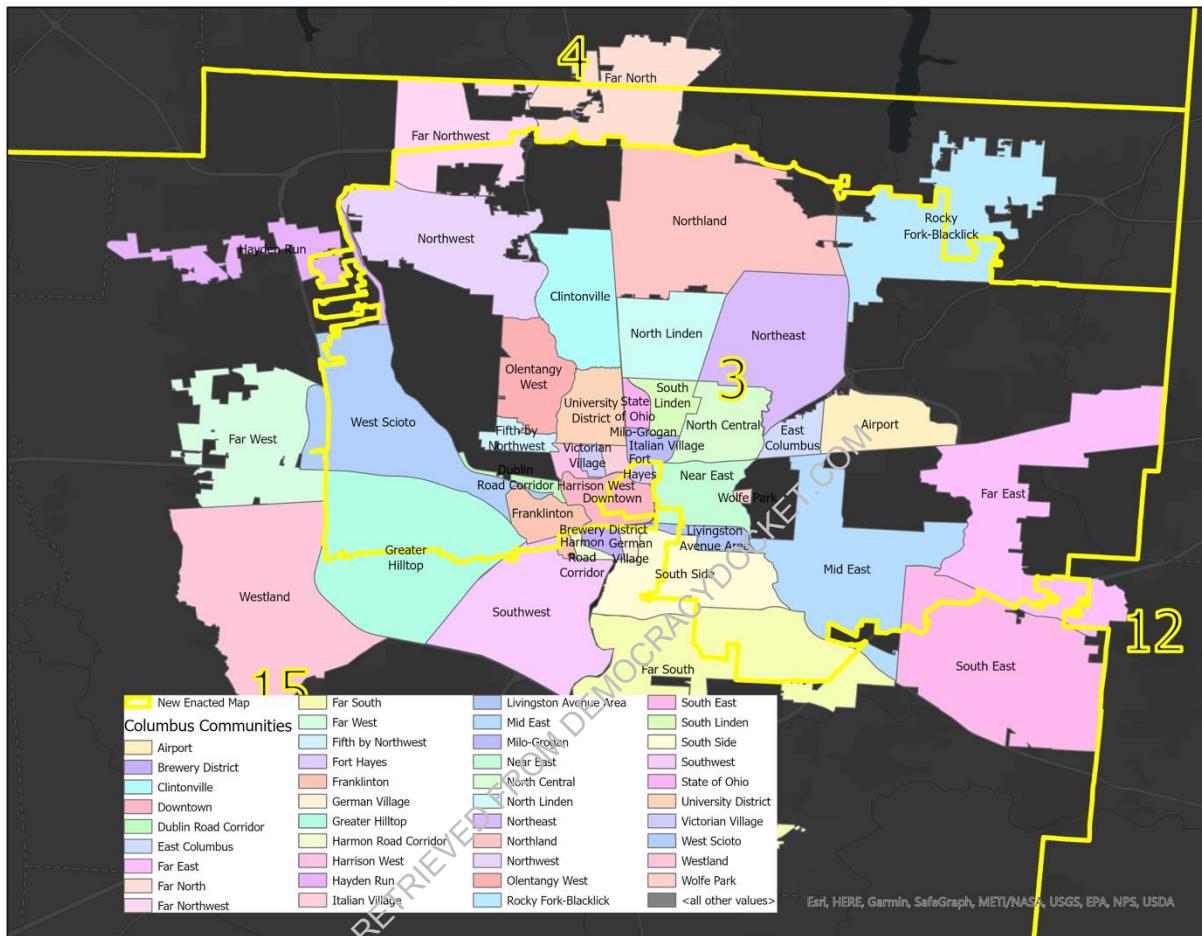
## The Boundary of the City of Columbus and Boundaries of the Enacted Plan and Alternative Plans

(Figure 16, Rodden Aff. at p. 38)



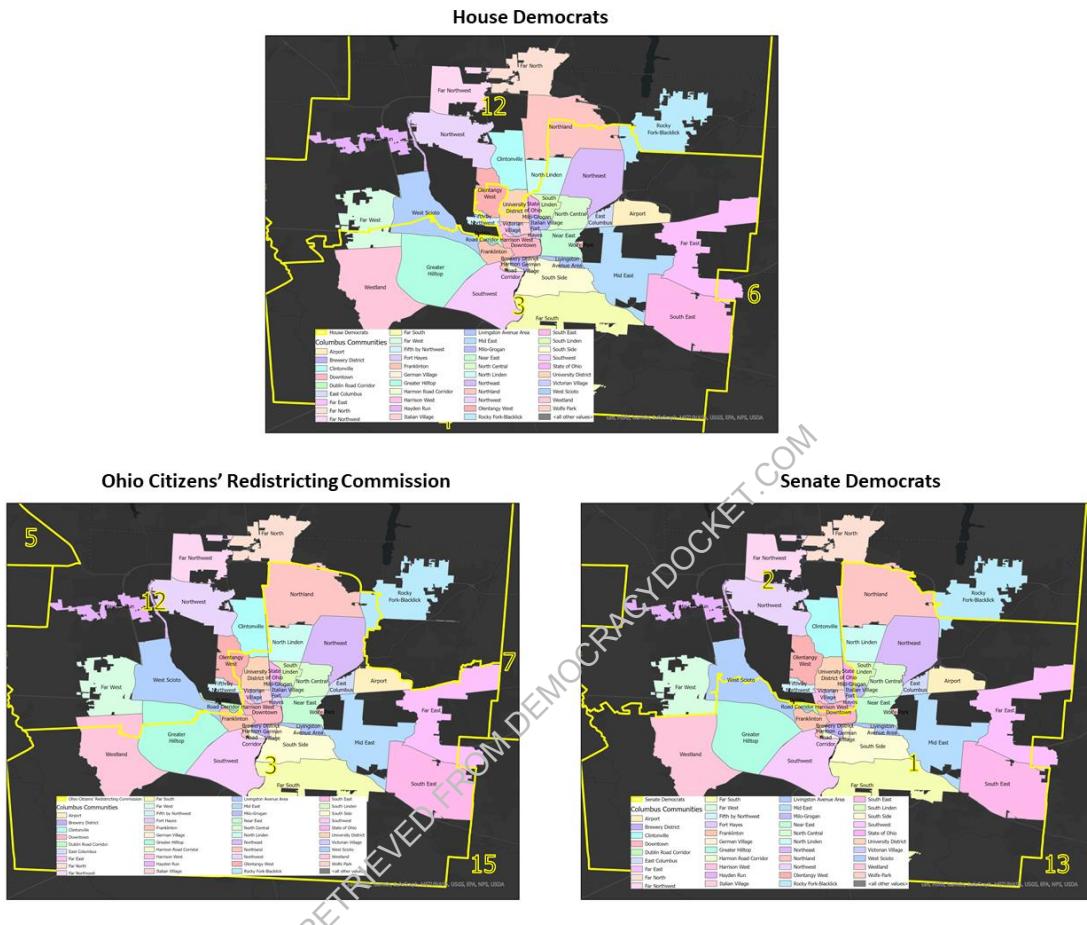
**The Boundary of the Communities of the City of Columbus and Boundaries of the Enacted Plan**

**(Figure 17, Rodden Aff. at p. 39)**



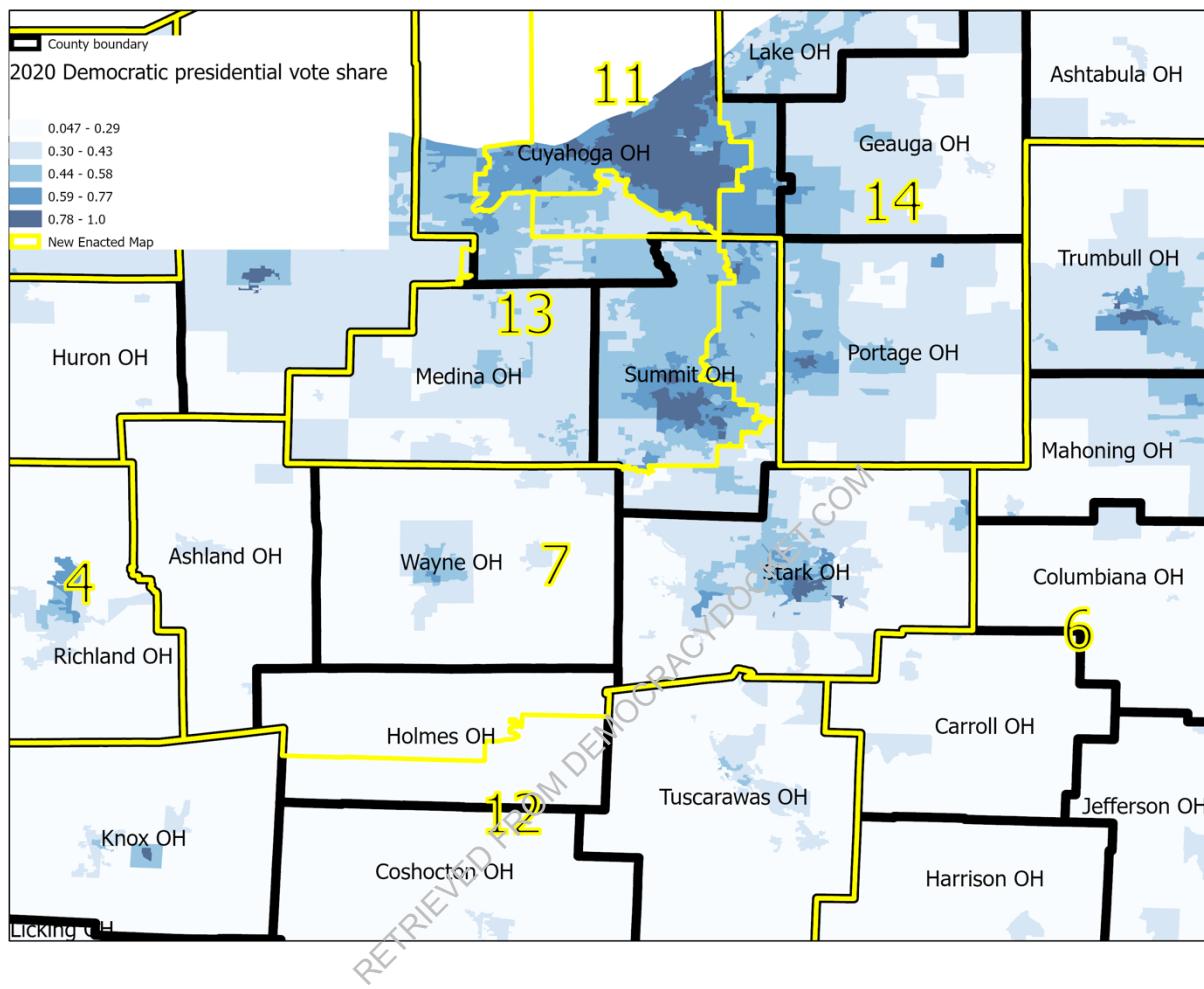
## **The Boundary of the Communities of the City of Columbus and Boundaries of the Alternative Plans**

(Figure 18, Rodden Aff. at p. 40)



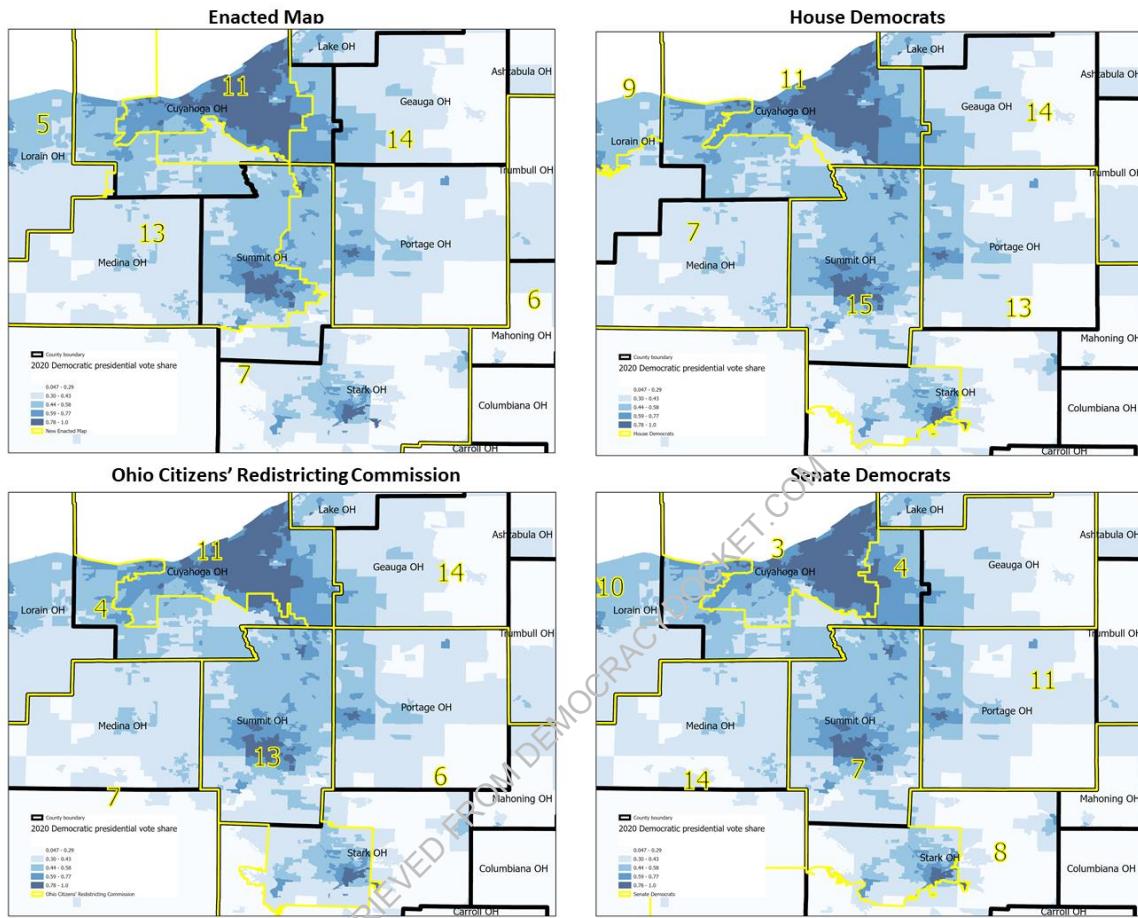
## Partisanship and the Boundaries of the Enacted Plan, Northeast Ohio

(Figure 19, Rodden Aff. at p. 41)



## Partisanship and the Boundaries of the Enacted and Alternative Plans, Northeast Ohio

(Figure 20, Rodden Aff. at p. 42)



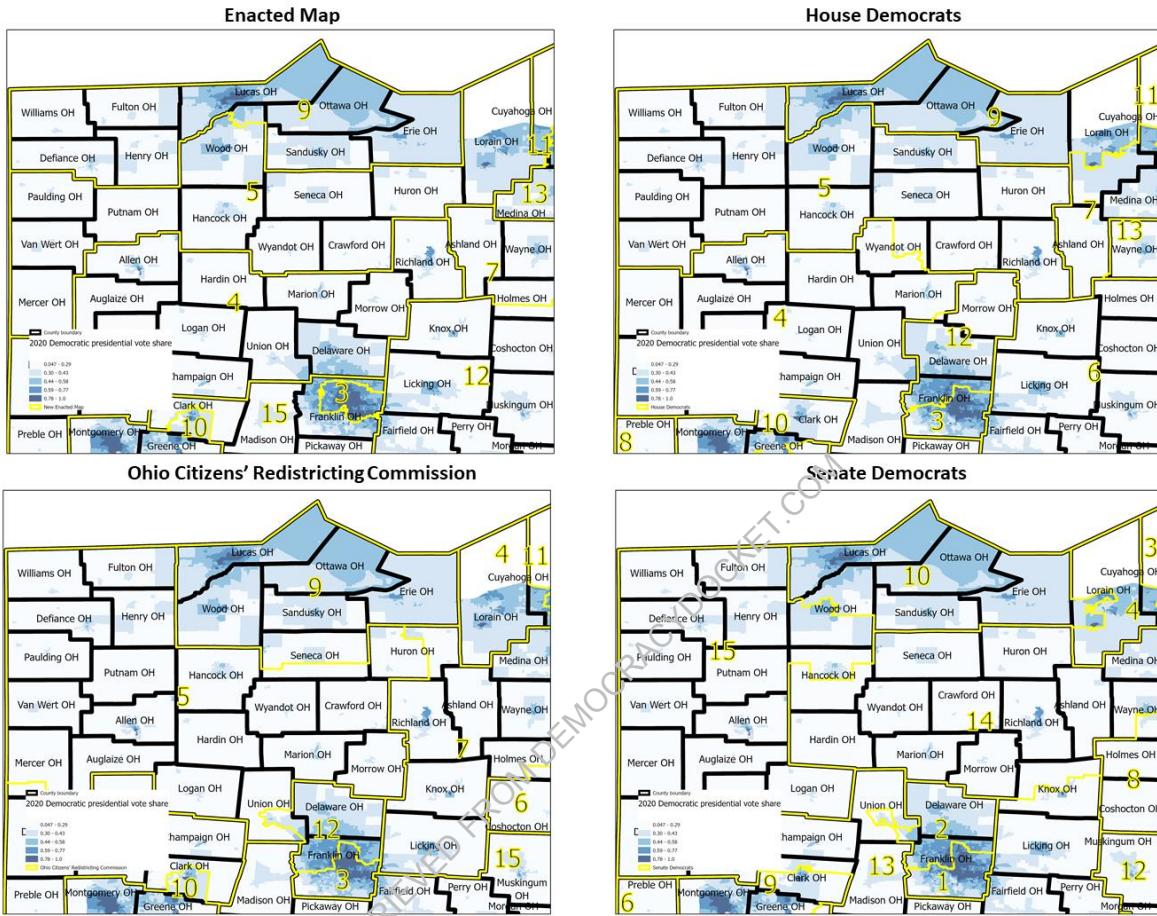
## The Cuyahoga Corridor

(Figure 21, Rodden Aff. at p. 43)



## Partisanship and the Boundaries of the Enacted and Alternative Plans, Northwest Ohio

**(Figure 22, Rodden Aff. at p. 44)**



## CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via email this 13th day of December, 2021 to the following:

Bridget C. Coontz, bridget.coontz@ohioago.gov  
Julie M. Pfeiffer, julie.pfeiffer@ohioago.gov  
Michael Walton, michael.walton@ohioago.gov

*Counsel for Respondents Ohio Governor DeWine, Ohio Secretary of State LaRose, Ohio Auditor Faber, House Speaker Robert R. Cupp, Senate President Matt Huffman, Senator Vernon Sykes, House Minority Leader Emilia Sykes, and Ohio Redistricting Commission*

W. Stuart Dornette, dornette@taftlaw.com  
Beth A. Bryan, bryan@taftlaw.com  
Philip D. Williamson, pwilliamson@taftlaw.com  
Phillip J. Strach, phil.strach@nelsonmullins.com  
Thomas A. Farr, tom.farr@nelsonmullins.com  
John E. Branch, III, john.branch@nelsonmullins.com  
Alyssa M. Riggins, alyssa.riggins@nelsonmullins.com

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

/s/ Derek S. Clinger  
Derek S. Clinger (0092075)