

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)

NEIMAN PETITIONERS' MOTION FOR LEAVE TO FILE REBUTTAL EVIDENCE

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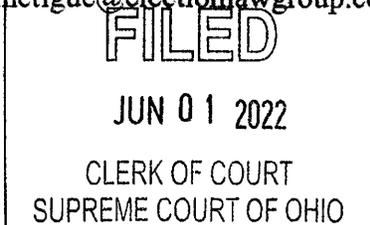
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Petitioners Meryl Neiman, *et al.*, respectfully request leave to file the attached discovery documents and emails between counsel to rebut the false claim made by the Republican Legislative Respondents in their merit brief that none of the Petitioners' experts "have been subject to discovery." Response Br. at 15. This Court recently explained that "[i]t is appropriate to seek leave of court to submit rebuttal evidence after the deadline for submitting evidence in an original action." *State ex rel. Ware v. Crawford*, Slip Opinion No. 2022-Ohio-295, ¶ 10; *see also State ex rel. Gil-Llamas v. Hardin*, 164 Ohio St.3d 364, 2021-Ohio-1508, 172 N.E.3d 998, ¶ 14 (striking rebuttal evidence filed in a mandamus action because "relators failed to seek leave of this court to file the supplemental evidence"); *State ex rel. Pike Cty. Convention & Visitors Bureau v. Pike Cty. Bd. of Comm'rs.*, 165 Ohio St.3d 590, 2021-Ohio-4031, 180 N.E.3d 1135, ¶ 7 fn.3 (disregarding documents presented by the parties after the evidence filing deadline without leave of court). Leave to file rebuttal evidence is necessary here because the evidence submission deadline was April 25, 2022—a deadline Respondents ignored by submitting additional documents with their merit brief one month later on May 25, 2022.

The rebuttal emails and documents that Petitioners seek leave to present to the Court directly rebut Respondents' inaccurate statements about the discovery conducted in this case, and, as such, are material to the credibility and weight of Petitioners' experts' testimony demonstrating the unconstitutionality of the congressional district plan adopted by the Ohio Redistricting Commission on March 2, 2022. In an attempt to attack Petitioners' arguments, Respondents assert that Petitioners "rely almost exclusively" on the experts' testimony and that "[n]one of these experts have been subject to discovery." Response Br. at 15. But the emails and documents attached to this motion demonstrate the falsity of these assertions. Respondents Cupp and Huffman served Petitioners with discovery requests on March 30, 2022, specifically requesting Petitioners'

experts' data and backup data used in the experts' analyses of the First and Second Congressional District Plans and in their expert reports. *See* June 1, 2022 Affidavit of Derek Clinger, ¶ 2-3 and Exhibits A-B thereto. Petitioners then provided the requested data to Respondents Cupp and Huffman two days later on April 1, 2022. *Id.* at ¶ 4 and Exhibits C-E thereto. Respondents did not send any follow-up discovery requests. *Id.* at ¶ 5. The emails and documents demonstrate that the experts' testimony *has* been subject to the rigors of discovery in contradiction to Respondents' assertion otherwise.

Petitioners did not submit the emails and documents attached to this motion with their evidence on April 25, 2022 for the simple reason that they did not have a reason to expect that it would become necessary to correct Respondents' description of discovery in this action.

For all these reasons, Petitioners respectfully request leave to file the attached rebuttal evidence.

Dated: June 1, 2022

Respectfully submitted,

/s/ Donald J. McTigue

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via email this 1st day of June, 2022 to the following:

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Counsel for League of Women Voters of Ohio Petitioners

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

Affidavit of Derek S. Clinger

Franklin County

/s

State of Ohio

I, Derek S. Clinger, having been duly sworn and cautioned according to law, hereby state that I am over the age of eighteen years and am competent to testify as to the facts set forth below based on my personal knowledge and having personally examined all records referenced in this affidavit, and further state as follows:

1. I am one of the attorneys for the Neiman Petitioners in the above-captioned matter, Case No. 2022-0298.
2. On March 30, 2022, counsel for Respondents Senate President Matt Huffman and House Speaker Robert Cupp served their "First Set of Document Requests to Petitioners" on the Neiman Petitioners' counsel via email. A true and accurate copy of Respondents' counsel's March 30, 2022 email is attached hereto as Exhibit A, and a true and accurate copy of Respondents' "First Set of Discovery Requests to Petitioners" is attached hereto as Exhibit B.
3. Respondent Huffman and Cupp's "First Set of Document Requests to Petitioners" consisted of the following two document requests:

REQUEST NO. 1: All Supporting Data or Backup Data drafted and/or utilized by Petitioners' Expert Witnesses, including but not limited to Drs. Imai, Rodden, Warshaw, and Chen, in their analysis of the Second Plan and any Expert Report. This includes but is not limited to 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.

RESPONSE:

REQUEST NO. 2: All Supporting Data or Backup Data drafted and/or utilized by Petitioners' Expert Witnesses, including but not limited to Drs. Imai, Rodden, Warshaw, and Chen, in their analysis of the First Plan and any Expert Report. This includes but is not limited to 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.

RESPONSE:

*See First Set of Document Requests to Petitioners at *6 (Ex. B)*

4. On April 1, 2022, counsel for the Neiman Petitioners emailed the Neiman Petitioners' "Responses and Objections to the Respondents Huffman and Cupp's First Set of Document Requests to Petitioners," and indicated that download links to four zip files containing files

from the Neiman Petitioners' experts, Dr. Chen and Dr. Rodden, would be sent separately. A true and accurate copy of the April 1, 2022 email from the Neiman Petitioners' counsel is attached hereto as Exhibit C, a true and accurate copy of the Neiman Petitioners' "Responses and Objections to the Respondents Huffman and Cupp's First Set of Document Requests to Petitioners" is attached hereto as Exhibit D, and a true and accurate copy of the secure message containing the download links to the four zip files containing the experts' data is attached hereto as Exhibit E.

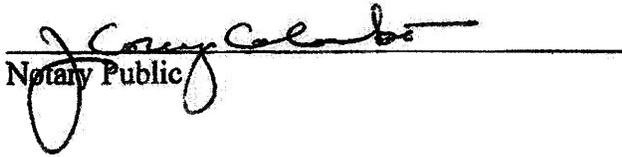
5. Following the provision of the Neiman Petitioners' Responses and Objections to the Respondents Huffman and Cupp's First Set of Document Requests to Petitioners and the responsive data from the Neiman Petitioners' experts, Respondents Huffman and Cupp never sent any additional discovery requests to the Neiman Petitioners.

FURTHER SAYETH AFFIANT NAUGHT.



Derek S. Clinger

Sworn to and subscribed before me this 1st day of June 2022.



Notary Public



JOHN COREY COLOMBO
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Section 147.03 R.C.

Exhibit A



Derek Clinger <dclinger@electionlawgroup.com>

Nieman/LWVO v. LaRose; Respondents Huffman and Cupp's First Set of Document Requests to Petitioners

1 message

Alyssa Riggins <alyssa.riggins@nelsonmullins.com> Wed, Mar 30, 2022 at 12:40 PM

To: Don McTigue <dmctigue@electionlawgroup.com>, Abha Khanna <akhanna@elias.law>, Ben Stafford <bstafford@elias.law>, Harleen Gambhir <hgambhir@elias.law>, Jyoti Jasrasaria <jjasrasaria@elias.law>, Spencer Klein <sklein@elias.law>, Raisa Cramer <rcramer@elias.law>, "dclinger@electionlawgroup.com" <dclinger@electionlawgroup.com>, "Erik J. Clark" <ejclark@organlegal.com>, "amerino@organlegal.com" <amerino@organlegal.com>, "benc@cooperelliott.com" <benc@cooperelliott.com>, "chipc@cooperelliott.com" <chipc@cooperelliott.com>, Julie Pfeiffer <Julie.Pfeiffer@ohioago.gov>, Michael Walton <michael.walton@ohioago.gov>, "Dornette, W. Stuart" <dornette@taftlaw.com>, "bryan@taftlaw.com" <bryan@taftlaw.com>, "pwilliamson@taftlaw.com" <pwilliamson@taftlaw.com>, "Jonathan.Blanton@OhioAGO.gov" <Jonathan.Blanton@ohioago.gov>, "Allison.Daniel@ohioAGO.gov" <Allison.Daniel@ohioago.gov>, "ddenuyl@cov.com" <ddenuyl@cov.com>, "jmsmith@cov.com" <jmsmith@cov.com>, "rfram@cov.com" <rfram@cov.com>, "yfu@cov.com" <yfu@cov.com>, "asharma@cov.com" <asharma@cov.com>, "dlistengourt@cov.com" <dlistengourt@cov.com>, "dwbrown@cov.com" <dwbrown@cov.com>, "ssuwanda@cov.com" <ssuwanda@cov.com>, "ajthomson@cov.com" <ajthomson@cov.com>, "sgethers@cov.com" <sgethers@cov.com>, "kplumer@cov.com" <kplumer@cov.com>, "jlamb@cov.com" <jlamb@cov.com>, "jebenstein@aclu.org" <jebenstein@aclu.org>, Freda Levenson <flevenson@acluohio.org>, "athomas@aclu.org" <athomas@aclu.org>, David Carey <dcarey@acluohio.org>, "Thomson, Alex" <AJThomson@cov.com>
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Dear Counsel,

Please find attached Respondents Huffman and Cupp's First Set of Document Requests to Petitioners. Anticipating that Petitioners' may want a protective order governing responsive materials, we have attached a draft protective order as well.

Best,

Alyssa

 NELSON MULLINS

LONG HISTORY. LASTING LEGACY.
LIMITLESS FUTURE.

125

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4 attachments

-  **Draft Protective Order -(Nieman_LWVO v. LaRose).pdf**
271K
-  **Draft Protective Order -(Nieman_LWVO v. LaRose).docx**
33K
-  **Respondents Huffman and Cupp's First Set of Document Requests to Petitioners (Neiman_LWVO v. LaRose).docx**
27K
-  **Respondents Huffman and Cupp's First Set of Document Requests to Petitioners (Neiman_LWVO v. LaRose).pdf**
274K

Exhibit B

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)

**RESPONDENTS HUFFMAN AND CUPP'S FIRST SET OF DOCUMENT REQUESTS
TO PETITIONERS**

Pursuant to Rule 34 of the Ohio Rules of Civil Procedure, and the Court's expedited scheduling order of March 29, 2022 Respondents Huffman and Cupp hereby propound to Petitioners the following requests for production of documents, to be responded to by 12:00 PM EST Friday, April 1, 2022. Documents and responsive to the following requests shall be produced via electronic means.

DEFINITIONS AND INSTRUCTIONS

- A. Notwithstanding any definition set forth below, each word, term, or phrase used in these requests 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 "Petitioners," "you," and "your" shall mean: the Petitioners individually, and collectively in this action, and other persons or entities acting or purporting to act on Petitioners' behalf.
 - (2) The term "Commission" shall mean the Ohio Redistricting Commission.

- (3) The term "Second Plan" shall mean the Congressional district plan approved by the Ohio Redistricting Commission on March 2, 2022.
- (4) The term "First Plan" shall mean the Congressional district plan passed by the General Assembly entitled S.B. 258, and signed into law by Governor DeWine on November 20, 2021.
- (5) 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.
- (6) The term "Expert Witness" means any individual retained by Petitioners and/or their counsel for the purpose of providing expert evidence or an expert report in this matter.
- (7) The term "Supporting Data" means any data used to analyze or create simulated plans or used in the assistance of drafting an expert report.
- (8) 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.
- (9) 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 message, 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.
- (10) 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. The following rules of construction apply to all requests for production:

- 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 requests 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 request may make appropriate.
- E. Each request for documents shall be construed according to its most inclusive meaning so that if information or a document is responsive to any reasonable interpretation of the request, the information or document is responsive.
- F. If you deem any request for documents to call for the production of privileged or otherwise nondisclosable materials and you assert such claim, furnish a list at the time of production identifying each document so withheld together with the following information:
- (1) the reason for withholding each such document or material, stated with sufficient particularity so as to permit the Court to adjudicate the validity of the claimed privilege;
 - (2) a statement of the facts constituting the basis for any claim of privilege or other ground of non-disclosure; and
 - (3) a brief description of each such document or other material, including:
 - (a) the date of the document;

- (b) the name of its author(s) or preparer(s) and an identification by employment and title of each such person(s);
 - (c) the name of each person to whom the document or other material was sent or who has had access to, or custody of, the document or other material, together with an identification of each such person(s);
 - (d) the paragraph of this request to which the document or other material is responsive; and
 - (e) in the case of any document or other material that relates in any way to a meeting or conversation, identification of such meeting or conversation and the persons attending or participating in such meeting or conversation.
- G. With respect to each document request, Respondents request that Petitioners identify and produce all documents that are known to Petitioners or that Petitioners can locate or discover that are in Petitioners' possession, custody or control, from whatever source derived, which, directly or indirectly, relate, refer or pertain to the subject matter of the request made, including, without limitation, all such documents in the files (whether they be denominated personal, business or any other files) in the possession, custody or control of Petitioners' or, as applicable, of Petitioners' employees, agents, representatives or other persons acting on Petitioners' behalf or under Petitioners' control.
- H. Respondents request that, if Petitioners are unable to respond to any of the requests 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 request to the fullest extent possible, specifying the extent of Petitioners' knowledge and Petitioners' inability to answer the remainder, and setting forth whatever information or knowledge Petitioners may have concerning the unanswered portions thereof and efforts Petitioners made to obtain the requested information. If Petitioners have no information responsive to a request, then Petitioners shall so state.
- I. Respondents request that Petitioners produce all responsive documents and other materials in an orderly manner (and with appropriate markings or other identification) so that Respondents will be able to identify the source of the document or other material, the file in which the document or other material was maintained, the person to whom such file belongs, and the specific request to which the document or other material is responsive.
- J. These requests shall be deemed to be continuing so as to require further and supplemental production if Petitioners receive or discover additional documents or other material between the time of original production and the time of any hearing, trial, or other presentation of evidence in this matter.
- K. All documents and data are to be produced in electronic form.

L. Produce any password-protected documents with any applicable passwords.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: All Supporting Data or Backup Data drafted and/or utilized by Petitioners' Expert Witnesses, including but not limited to Drs. Imai, Rodden, Warshaw, and Chen, in their analysis of the Second Plan and any Expert Report. This includes but is not limited to 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.

RESPONSE:

REQUEST NO. 2: All Supporting Data or Backup Data drafted and/or utilized by Petitioners' Expert Witnesses, including but not limited to Drs. Imai, Rodden, Warshaw, and Chen, in their analysis of the First Plan and any Expert Report. This includes but is not limited to 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.

RESPONSE:

This the 30th day of March, 2022.

By:

/s/ Phillip J. Strach

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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on this the 30th day of March, 2022, I have served the foregoing document by email:

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/s/ Phillip J. Strach
(PHV 2022-25444)

4853-9439-9001 v.1

Exhibit C

1



Derek Clinger <dclinger@electionlawgroup.com>

RE: Nieman/LWVO v. LaRose; Respondents Huffman and Cupp's First Set of Document Requests to Petitioners

1 message

Harleen Gambhir <hgambhir@elias.law>

Fri, Apr 1, 2022 at 12:53 PM

To: Phil Strach <phil.strach@nelsonmullins.com>, Alyssa Riggins <alyssa.riggins@nelsonmullins.com>, Don McTigue <dmctigue@electionlawgroup.com>, Abha Khanna <akhanna@elias.law>, Ben Stafford <bstafford@elias.law>, Jyoti Jasrasaria <jjasrasaria@elias.law>, Spencer Klein <sklein@elias.law>, Raisa Cramer <rcramer@elias.law>, "dclinger@electionlawgroup.com" <dclinger@electionlawgroup.com>, "Erik J. Clark" <ejclark@organlegal.com>, "amerino@organlegal.com" <amerino@organlegal.com>, "benc@cooperelliott.com" <benc@cooperelliott.com>, "chipc@cooperelliott.com" <chipc@cooperelliott.com>, Julie Pfeiffer <Julie.Pfeiffer@ohioago.gov>, Michael Walton <michael.walton@ohioago.gov>, "Dornette, W. Stuart" <dornette@taftlaw.com>, "bryan@taftlaw.com" <bryan@taftlaw.com>, "pwilliamson@taftlaw.com" <pwilliamson@taftlaw.com>, "Jonathan.Blanton@OhioAGO.gov" <Jonathan.Blanton@ohioago.gov>, "Allison.Daniel@ohioAGO.gov" <Allison.Daniel@ohioago.gov>, "ddenuyl@cov.com" <ddenuyl@cov.com>, "jmsmith@cov.com" <jmsmith@cov.com>, "rfram@cov.com" <rfram@cov.com>, "yfu@cov.com" <yfu@cov.com>, "asharma@cov.com" <asharma@cov.com>, "dlistengourt@cov.com" <dlistengourt@cov.com>, "dwbrown@cov.com" <dwbrown@cov.com>, "ssuwanda@cov.com" <ssuwanda@cov.com>, "ajthomson@cov.com" <ajthomson@cov.com>, "sgethers@cov.com" <sgethers@cov.com>, "kplumer@cov.com" <kplumer@cov.com>, "jlamb@cov.com" <jlamb@cov.com>, "jebenstein@aclu.org" <jebenstein@aclu.org>, Freda Levenson <flevenson@acluohio.org>, "athomas@aclu.org" <athomas@aclu.org>, David Carey <dcarey@acluohio.org>, "Thomson, Alex" <AJThomson@cov.com>
Cc: Tom Farr <tom.farr@nelsonmullins.com>, Cassie Holt <cassie.holt@nelsonmullins.com>, John Branch <john.branch@nelsonmullins.com>

Phil,

Thank you for the confirmation. Attached, please find the Neiman Petitioners' Responses and Objections to Respondents Huffman and Cupp's First Set of Document Requests to Petitioners.

Counsel for Respondents Huffman and Cupp should receive an email notification from Perkins Coie's ESS production team shortly, with a link to the responsive documents. There will be four zip files, NEIMAN000001 to NEIMAN000004. NEIMAN000001 to NIEMAN000003 are designated as Confidential under the Protective Order and contain files from Dr. Chen; NEIMAN000004 contains files from Dr. Rodden.

We will send the files to other counsel upon receipt of your agreement to accept them according to the terms of the proposed Protective Order.

Best,

Harleen

Harleen Gambhir

Associate

Elias Law Group LLP

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(she/her)

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From: Phil Strach <phil.strach@nelsonmullins.com>

Sent: Friday, April 1, 2022 11:17 AM

To: Harleen Gambhir <hgambhir@elias.law>; Alyssa Riggins <alyssa.riggins@nelsonmullins.com>; Don McTigue <dmctigue@electionlawgroup.com>; Abha Khanna <akhanna@elias.law>; Ben Stafford <bstafford@elias.law>; Jyoti Jasrasaria <jjasrasaria@elias.law>; Spencer Klein <sklein@elias.law>; Raisa Cramer <rcramer@elias.law>; dclinger@electionlawgroup.com; Erik J. Clark <ejclark@organlegal.com>; amerino@organlegal.com; benc@cooperelliott.com; chipc@cooperelliott.com; Julie Pfeiffer <Julie.Pfeiffer@ohioago.gov>; Michael Walton <michael.walton@ohioago.gov>; Dornette, W. Stuart <dornette@taftlaw.com>; bryan@taftlaw.com; pwilliamson@taftlaw.com; Jonathan.Blanton@OhioAGO.gov; Allison.Daniel@ohioAGO.gov; ddenuyl@cov.com; jmsmith@cov.com; rfram@cov.com; yfu@cov.com; asharma@cov.com; dlistengourt@cov.com; dwbrown@cov.com; ssuwanda@cov.com; ajthomson@cov.com; sgethers@cov.com; kplumer@cov.com; jlamb@cov.com; jebenstein@aclu.org; Freda Levenson <flevenson@acluohio.org>; athomas@aclu.org; David Carey <dcarey@acluohio.org>; Thomson, Alex <AJThomson@cov.com>

Cc: Tom Farr <tom.farr@nelsonmullins.com>; Cassie Holt <cassie.holt@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>

Subject: RE: Nieman/LWVO v. LaRose; Respondents Huffman and Cupp's First Set of Document Requests to Petitioners

Harleen,

Those changes are acceptable to us. We look forward to the production and agree that it is subject to the provisions of the protective order even though it has not yet been entered by the court.

Thanks.

Phil



PHILLIP J. STRACH PARTNER

phil.strach@nelsonmullins.com

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From: Harleen Gambhir <hgambhir@elias.law>

Sent: Friday, April 1, 2022 11:02 AM

To: Alyssa Riggins <alyssa.riggins@nelsonmullins.com>; Don McTigue <dmctigue@electionlawgroup.com>; Abha Khanna <akhanna@elias.law>; Ben Stafford <bstafford@elias.law>; Jyoti Jasrasaria <jjasrasaria@elias.law>; Spencer Klein <sklein@elias.law>; Raisa Cramer <rcramer@elias.law>; dclinger@electionlawgroup.com; Erik J. Clark <ejclark@organlegal.com>; amerino@organlegal.com; benc@cooperelliott.com; chipc@cooperelliott.com; Julie Pfeiffer <Julie.Pfeiffer@ohioago.gov>; Michael Walton <michael.walton@ohioago.gov>; Dornette, W. Stuart <dornette@taftlaw.com>; bryan@taftlaw.com; pwilliamson@taftlaw.com; Jonathan.Blanton@OhioAGO.gov; Allison.Daniel@ohioAGO.gov; ddenuyl@cov.com; jmsmith@cov.com; rfram@cov.com; yfu@cov.com; asharma@cov.com; dlistengourt@cov.com; dwbrown@cov.com; ssuwanda@cov.com; ajthomson@cov.com; sgethers@cov.com; kplumer@cov.com; jlamb@cov.com; jebenstein@aclu.org; Freda Levenson <flevenson@acluohio.org>; athomas@aclu.org; David Carey <dcarey@acluohio.org>; Thomson, Alex <AJThomson@cov.com>

Cc: Phil Strach <phil.strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; Cassie Holt <cassie.holt@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>

Subject: RE: Nieman/LWVO v. LaRose; Respondents Huffman and Cupp's First Set of Document Requests to Petitioners

Dear Counsel,

The Neiman Petitioners agree to the proposed protective order, subject to the minor edits in the attached document. Please let us know whether you agree to the changes. If so, we will provide responsive documents today, subject to the mutual understanding that the terms of the edited protective order will apply to those documents, even though the order will not yet have been entered by the Court.

Best,

Harleen

Harleen Gambhir

Associate

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(she/her)

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From: Alyssa Riggins <alyssa.riggins@nelsonmullins.com>

Sent: Wednesday, March 30, 2022 12:41 PM

To: Don McTigue <dmctigue@electionlawgroup.com>; Abha Khanna <akhanna@elias.law>; Ben Stafford <bstafford@elias.law>; Harleen Gambhir <hgambhir@elias.law>; Jyoti Jasrasaria <jjasrasaria@elias.law>; Spencer Klein <sklein@elias.law>; Raisa Cramer <rcramer@elias.law>; dclinger@electionlawgroup.com; Erik J. Clark <ejclark@organlegal.com>; amerino@organlegal.com; benc@cooperelliott.com; chipc@cooperelliott.com; Julie Pfeiffer <Julie.Pfeiffer@ohioago.gov>; Michael Walton <michael.walton@ohioago.gov>; Dornette, W. Stuart <dornette@taftlaw.com>; bryan@taftlaw.com; pwilliamson@taftlaw.com; Jonathan.Blanton@OhioAGO.gov; Allison.Daniel@ohioAGO.gov; ddenuyt@cov.com; jmsmith@cov.com; rfram@cov.com; yfu@cov.com; asharma@cov.com; dlistengourt@cov.com; dwbrown@cov.com; ssuwanda@cov.com;

ajthomson@cov.com; sgethers@cov.com; kplumer@cov.com; jlamb@cov.com; jebenstein@aclu.org; Freda Levenson <flevenson@acluohio.org>; athomas@aclu.org; David Carey <dcarey@acluohio.org>; Thomson, Alex <AJThomson@cov.com>
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Subject: Nieman/LWVO v. LaRose; Respondents Huffman and Cupp's First Set of Document Requests to Petitioners

Dear Counsel,

Please find attached Respondents Huffman and Cupp's First Set of Document Requests to Petitioners. Anticipating that Petitioners' may want a protective order governing responsive materials, we have attached a draft protective order as well.

Best,

Alyssa



ALYSSA RIGGINS SENIOR ASSOCIATE

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Exhibit D

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

Petitioners,

v.

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

Respondents.

Case No. 2022-0298

Original Action Filed Pursuant to
Ohio Const., Art. XIX, Sec. 3(A) and Art.
IV Sec. 2(B)(1)(f)

*Expedited Election Matter Under
S.Ct.Prac.R. 12.08*

PETITIONERS' RESPONSES AND OBJECTIONS TO RESPONDENTS HUFFMAN
AND CUPP'S FIRST REQUESTS FOR PRODUCTION

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*Counsel for Respondent Ohio Redistricting
Commission*

Pursuant to Rule 34 of the Ohio Rules of Civil Procedure, Petitioners submit these objections and responses to Respondents Huffman and Cupp's First Set of Document Requests to Petitioners (the "Requests"). These responses and objections reflect Petitioners' current knowledge and information, and Petitioners reserve the right to alter, supplement, amend, or otherwise modify these responses and objections based on later recollections or the discovery of additional documents or information.

OBJECTIONS TO ALL REQUESTS

Petitioners make their responses subject to the following objections (the "Objections to All Requests"):

1. Petitioners object to Respondents' imposition of a deadline of noon on Friday, April 1, 2022, by which to respond to the Requests, which is less than 48 hours after Respondents served the Requests at 12:41 pm on March 30, 2022. Petitioners recognize the urgency of this matter and the need for prompt discovery and will use their best efforts to respond to the Requests on an urgent basis. Petitioners expect to complete their production of documents responsive to the Requests by the end of the day today, April 1, 2022.

2. Petitioners object to the Requests to the extent that they seek the production of documents protected by attorney-client privilege, the attorney work product doctrine, or any other applicable privilege. In responding to the Requests, Petitioners do not intend to, and do not, waive any applicable privilege as to any document or information.

3. Petitioners object to the Requests to the extent that they seek the production of publicly available information or documents, including but not limited to data available from the United States Census Bureau and the Redistricting Data Hub. It would be unreasonably burdensome to require Petitioners to produce such information or documents, which are equally

available to Respondents directly from those sources. Petitioners therefore will not produce such information or documents in responding to the Requests.

RESPONSES AND OBJECTIONS TO SPECIFIC REQUESTS

REQUEST NO. 1: All Supporting Data or Backup Data drafted and/or utilized by Petitioners' Expert Witnesses, including but not limited to Drs. Imai, Rodden, Warshaw, and Chen, in their analysis of the Second Plan and any Expert Report. This includes but is not limited to 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.

RESPONSE: In addition to their Objections to All Requests, Petitioners object to this request as vague, because it does not define the terms "Backup Data" and "simulated plan," and because the definition of the term "Supporting Data" is itself vague. Petitioners interpret the request to cover all non-publicly available materials necessary to replicate the analysis of the Second Plan in any Expert Report of Drs. Imai, Rodden, Warshaw, and Chen, and interpret "simulated plan" to cover those simulated plans that were analyzed by Dr. Chen in his expert report. Subject to and without waiving their objections, Plaintiffs will produce responsive, nonprivileged documents in their possession, custody, or control responsive to this request.

REQUEST NO. 2: All Supporting Data or Backup Data drafted and/or utilized by Petitioners' Expert Witnesses, including but not limited to Drs. Imai, Rodden, Warshaw, and Chen, in their analysis of the First Plan and any Expert Report. This includes but is not limited to 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.

RESPONSE: In addition to their Objections to All Requests, Petitioners object to this request as vague, because it does not define the terms “Backup Data” and “simulated plan,” and because the definition of the term “Supporting Data” is itself vague. Petitioners interpret the request to cover all non-publicly available materials necessary to replicate the analysis of the First Plan in any Expert Report of Drs. Imai, Rodden, Warshaw, and Chen, and interpret “simulated plan” to cover those simulated plans that were analyzed by Dr. Chen in his expert report. Subject to and without waiving those objections, Plaintiffs will produce the responsive, nonprivileged documents in their possession, custody, or control responsive to this request.

Dated: April 1, 2022

Respectfully submitted,

/s/ Donald J. McTigue

Donald J. McTigue* (0022849)

**Counsel of Record*

Derek S. Clinger (0092075)

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Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via email this 1st day of April, 2022 to the following:

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Julie M. Pfeiffer, julie.pfeiffer@ohioago.gov
Michael Walton, michael.walton@ohioago.gov
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Alyssa M. Riggins, alyssa.riggins@nelsonmullins.com

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

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

Counsel for Respondent Ohio Redistricting Commission

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

Exhibit E

Neiman Petitioners' First Production of Documents in Response to Respondents Huffman and Cupp's First Set of Document Requests



rllewellyn@perkinscoie.com

Apr 1, 2022, 1:23 PM

To:

phil.strach@nelsonmullins.com john.branch@nelsonmullins.com tom.farr@nelsonmullins.com cassie.holt@nelsonmullins.com alyssa.riggins@nelsonmullins.com

Cc:

hgambhir@elias.law bstafford@elias.law dclinger@electionlawgroup.com dmctigue@electionlawgroup.com rcramer@elias.law jjasrasaria@elias.law

4 attachments - Expire: 1651463999000

Message body secured

File attachments expire: May 01, 2022 23:59:59 GMT

Name	Size	Digital Fingerprint
 NEIMAN000001_CONFIDENTIAL.zip	377.8 MB	4a9389f61adeda08a31f19b47d264dc3md5
 NEIMAN000002_CONFIDENTIAL.zip	1.7 GB	81d0beff987feae6443ed3c73bf1eb79md5
 NEIMAN000003_CONFIDENTIAL.zip	949.9 MB	ff14c52dbfb83a2ca46fb787ccdc6c62md5
 NEIMAN000004.zip	1.1 GB	107f34c1fc3840fe836b3ac45c77c0afmd5