

In The
Ohio Supreme Court

REGINA C. ADAMS, et al.,

Relators,

v.

GOVERNOR MIKE DEWINE, et al.,

Respondents.

:
:
: **Case No. 2021-1428**
:
: **Original Action Pursuant to**
: **Ohio Const., Art. XIX, § 3(A)**
:
: **Redistricting Case**
:

SECRETARY OF STATE FRANK LAROSE'S RESPONSE TO
RELATORS' MOTION FOR ORAL ARGUMENT

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Relators already asked this Court to schedule an oral argument and it declined to do so. *See Relators’ Motion for Scheduling Order; and see Scheduling Order.* Given the speed with which this case must be litigated, that decision was correct. There is not sufficient time to schedule and hold oral arguments in this case. Relators’ second motion for an oral argument ignores that fact and seeks to further delay it. But that delay will wreak havoc on Ohio’s ability to comply with all of its existing election-related deadlines. *See Respondent LaRose’s Response to Relators’ Motion for Scheduling Order.* Because of this, the Secretary respectfully requests that Relators’ second motion for oral argument be denied.

There is no doubt that this case is important. But, important cases—such as election cases—are often the ones that must be decided the quickest, and on the briefs. As this Court is well aware, time is of the essence in these congressional redistricting cases. The Secretary has already detailed how delaying the resolution of this case will negatively affect all those involved with the primary election. *See Adams, et al. v. DeWine, et al.*, No. 2021-1428, Thus, this Court issued its comprehensive Scheduling Order which rightfully makes this case decisional by

December 20, 2021. Mindful of that schedule, the Secretary of State issued an advisory which set deadlines for petition certification and protests. *See* SOS Advisory 2021-06 at p. 2-3, available at <https://www.ohiosos.gov/globalassets/elections/advisories/2021/adv2021-06.pdf>. Changing the schedule to accommodate oral argument will put existing election deadlines at risk and could require the Secretary to amend the Advisory 2021-06, on which boards of elections and candidates are already relying. Such confusion—like oral argument—is unnecessary. This case can be, and should be, decided on the briefs and Relators’ request for oral argument should again be denied.

In the event that the Court is inclined to grant Relators’ request, Secretary LaRose requests that any oral argument be held as soon as possible so as to not further delay resolution of this matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2021, the foregoing *Secretary Of State Frank Larose*, *Response To Relators' Motion For Oral Argument* was filed electronically. I further certify that a copy of the foregoing has been served via the electronic mail upon the following counsel for Relators.

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