

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**Ohio A. Philip Randolph Institute, et al.,**

Plaintiffs,

vs.

**Ryan Smith, Speaker of the Ohio House of  
Representatives, et al.,**

Defendants.

Case No.: 1:18-cv-00357-TSB

Judge Timothy S. Black  
Judge Karen Nelson Moore  
Judge Michael H. Watson

Magistrate Judge Karen L Litkovitz

**MOTION OF REPUBLICAN CONGRESSIONAL DELEGATION,  
OHIO VOTERS, AND REPUBLICAN PARTY ORGANIZATIONS TO INTERVENE**

Applicants for Intervention Steve Chabot, Brad Wenstrup, Jim Jordan, Bob Latta, Bill Johnson, Bob Gibbs, Warren Davidson, Michael Turner, Dave Joyce, and Steve Stivers (together, the “**Member Intervenor Applicants**”) are duly elected representatives of the U.S. House of Representatives, members of the Republican Party, and represent the challenged districts. Applicants for Intervention, the Republican Party of Cuyahoga County (“**RPCC**”) and the Franklin County Republican Party (“**FCRP**”), are county political parties duly authorized and existing under Ohio law (the “**Party Intervenor Applicants**”). Finally, applicants for Intervention Robert F. Bodi, Charles Drake, Roy Palmer III, and Nathan Aichele (the “**Voter Intervenor Applicants**”) and, collectively with the Member Intervenor Applicants and Party Intervenor Applicants, the “**Intervenor Applicants**”) are registered voters who reside in Ohio congressional districts challenged in this litigation. The Intervenor Applicants’ personal and organizational interests and rights will be directly impacted by the outcome of this case. For this reason and the reasons stated in the accompanying Memorandum, the Intervenor Applicants respectfully move this Court, pursuant to Fed. R. Civ. P. 24(a), for intervention as a matter of right; or, in the alternative, pursuant

to Fed. R. Civ. P. 24(b), for permissive intervention in this case to protect their right to vote and personal interests. Pursuant to Fed. R. Civ. P. 24(c), the Intervenor Applicants attach their proposed Answer to the Second Amended Complaint as their responsive pleading.

Prior to filing this motion, the Intervenor Applicants contacted counsel for the existing Defendants in this case. Those Defendants have represented to the undersigned that they consent to the intervention of the Intervenor Applicants in this action.

WHEREFORE, for the foregoing reasons, the Intervenor Applicants respectfully request that this Court grant this motion, permit their intervention, and accept their Answer for filing.

Dated: July 20, 2018

Respectfully submitted,

**BAKERHOSTETLER LLP**

*/s/ Patrick T. Lewis*

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*Counsel for Intervenor Applicants*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2018, a true and correct copy of the foregoing was filed via the Court's CM/ECF system and served via electronic filing upon all counsel of record in this case.

/s/ Patrick T. Lewis  
Patrick T. Lewis (0078314)  
*Counsel for Intervenor Applicants*