

**IN THE SUPREME COURT OF OHIO**

THE OHIO ORGANIZING  
COLLABORATIVE, *et al.*,

*Relators,*

v.

OHIO REDISTRICTING  
COMMISSION, *et al.*,

*Respondents.*

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Case No. 2021-1210

**APPORTIONMENT CASE**

Filed pursuant to S.Ct.Prac.R. 14.03(A)  
and section 9 of Article XI of the Ohio  
Constitution to challenge a plan of  
apportionment promulgated pursuant to  
Article XI.

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**RELATORS' MOTION FOR SCHEDULING ORDER**

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## RELATORS' MOTION FOR SCHEDULING ORDER

Pursuant to S.Ct.Prac.R. 14.03(B), relators the Ohio Organizing Collaborative *et al.* hereby move this Court to adopt the schedule proposed by relators in *League of Women Voters of Ohio v. Ohio Redistricting Commission*, No. 2021-1193, as the scheduling order governing the proceedings in this apportionment case (with one exception for relators' service of document requests and interrogatories). This apportionment case and the apportionment case docketed as case number 2021-1193 are based on the same operative set of facts and the relators in both cases challenge as unconstitutional the General Assembly district plan adopted by the Ohio Redistricting Commission. Relators in this apportionment case expect to seek substantially the same discovery as relators in case number 2021-1193, such that respondents' production of documents, responses to interrogatories, and deposition testimony will be equally responsive to discovery propounded by relators in this case. Thus, these cases should share a common schedule to serve the interests of efficiency and to obtain a ruling from this Court in advance of applicable candidate filing deadlines.

Accordingly, and for the additional reasons stated in the League of Women Voters' motion for scheduling order, and based on the allegations of relators in this apportionment case and supporting affidavits, relators the Ohio Organizing Collaborative *et al.* respectfully request that the Court enter the following scheduling order in this case.

<b>DEADLINE</b>	<b>DESCRIPTION</b>
September 28	Service of Relators' document requests and interrogatories
October 1	Relators' expert disclosures
October 8	Production by Respondents of all documents and interrogatory responses
October 15	Respondents' expert disclosures
October 22	Relators' rebuttal expert disclosures
October 29	Discovery cutoff (including completion of all depositions)
November 5	Concurrent submission of evidence by all parties
November 10	Relators' merits brief
November 17	Respondents' merits brief, evidentiary objections, including in limine and/or <i>Daubert</i> motions
November 17	Relators' evidentiary objections, including in limine and/or <i>Daubert</i> motions
November 24	Relators' reply brief
November 24	Relators' responses to Respondents' evidentiary objections, including in limine and/or <i>Daubert</i> motions
November 24	Respondents' responses to Relators' evidentiary objections (including in limine motions and/or <i>Daubert</i> motions)

Relators in this case are available for oral argument at the Court's convenience. Relators' proposed schedule assumes that filing and service shall be electronic and that all dates are calculated through 11:59 p.m. ET.

Dated: September 27, 2021

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*\*Pro Hac Vice Motion Forthcoming*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served via email on September 27, 2021 upon the following:

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/s/ Peter M. Ellis

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