

IN THE SUPREME COURT OF OHIO

**The Ohio Organizing Collaborative, et al.,:**  
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**Relators,** :  
:  
v. : **Case No. 2021-1210**  
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:  
**Ohio Redistricting** : **Original Action Filed Pursuant to Ohio**  
**Commission, et al.,** : **Constitution, Article XI, Section 9(A)**  
:  
:  
**Respondents.** : **[Apportionment Case Pursuant to S. Ct.**  
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**RESPONDENTS SENATOR VERNON SYKES' AND HOUSE MINORITY LEADER  
EMILIA SYKES' RESPONSE TO RELATORS' MOTION TO COMPEL EXPEDITED  
DISCOVERY**

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*Counsel for Respondents Senator Vernon Sykes and House Minority Leader Emilia Sykes*

Respondents Senator Vernon Sykes and House Minority Leader Emilia Sykes (collectively, “Democratic Respondents”) do not oppose Relators’ motion for an order compelling expedited discovery for the reasons set forth below.

Respectfully submitted,

ICE MILLER LLP

*/s/ Diane Menashe*

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## MEMORANDUM IN SUPPORT

Democratic Respondents do not oppose Relators' motion to compel expedited discovery because the information sought is essential for a fair adjudication of this case. The issues in this litigation concern the amended redistricting provision of Article XI of the Ohio Constitution. The Court should have the benefit of as much relevant information as reasonably possible, and gathered in a timely fashion, to help it reach the best decision on these issues. Moreover, although Democratic Respondents are purportedly members of the Ohio Redistricting Commission, they have been systematically shut out of the decision-making process. The only way they too might learn what has been done in the name of the Commission on which they serve as members will be the discovery procedures that the Court can make available in this litigation.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2021, a copy of the foregoing Respondents Senator Vernon Sykes' and House Minority Leader Emilia Sykes' Response to Relators' Motion to Compel Expedited Discovery was filed electronically and sent via email to the following:

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