IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

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

INTERVENORS' MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

As Defendants show in their motion for summary judgment and supporting materials, this case is ripe for dismissal at this time as a matter of law because (1) Plaintiffs have failed to show the type of individualized injury necessary to establish Article III standing, (2) they have failed to articulate a judicially manageable standard to apply to their claims, and (3) they have not established a violation of the Constitution under any standard remotely cognizable under the Equal Protection Clause, the First Amendment, or Article I, § 4. To help streamline the issues before the Court and support the ends of judicial and litigation economy, the Intervenors[1] do not here file a separate motion for summary judgment and supporting materials. Instead, the Intervenors join Defendants' motion and incorporate their arguments and supporting materials by reference. They submit this separate Memorandum only to supplement Defendants' arguments on the question of justiciability, to aid the Court's consideration of that difficult issue.

[1] The Intervenors are ten members of Ohio's congressional delegation, two county political parties, and four Ohio voters the Court allowed to intervene on August 16, 2018. *See* Order Granting Mot. for Intervention, ECF No. 64, PageID #675-683.

Plaintiffs' Herculean discovery efforts over the past six months, including several dozen subpoenas, numerous fact-witness depositions, multiple expert reports and depositions, and billions of maps produced by a quarter-billion-dollar supercomputer, have clarified only one thing: this will not be the case in which the long-elusive "justiciable standard by which to resolve…partisan gerrymandering claims" emerges. *Gill v. Whitford*, 138 S. Ct. 1916, 1928 (2018). In denying Defendants' motion to dismiss, this Court warned Plaintiffs that "when plaintiffs propose no standard for adjudicating a claim of partisan gerrymandering brought under the Equal Protection Clause of the Fourteenth Amendment, the claim is nonjusticiable." (Order Denying Mot. to Dismiss ("Denial Order"), ECF No. 61, at 6, PageID #658) (discussing summary affirmance in *Harris v. Cooper*, 138 S. Ct. 2711 (2018)). Accordingly, the Court placed the burden of articulating a justiciable, manageable test on Plaintiffs:

> [E]ven if the plaintiffs demonstrate that there was political asymmetry or a lack of efficiency in the political map that diluted their right to vote, they will need to articulate a test that allows the Court to determine whether the level of asymmetry or inefficiency rises to an unconstitutional level.

(Denial Order, ECF No. 61, at 14 n.4, PageID #666; *see also id.* at 7 n.3, PageID #659) (stating the Court's intent to "evaluat[e] whether standards proposed *by litigants* are manageable") (emphasis added).

Nearly five months later, Plaintiffs have not done what this Court directed them to do: propose and support a manageable standard for the Court to apply to their claims. In fact, their experts have admitted that their various methods do not provide a standard for determining at what point "partisan dominance is too much." *Gill*, 138 S. Ct. at 1928 (quoting *League of United Latin American Citizens v. Perry (LULAC)*, 548 U.S. 399, 420 (2006) (opinion of Kennedy, J.)). That alone defeats Plaintiffs' claims. Moreover, Plaintiffs' efforts to prove some level of discriminatory intent have also failed. In *LULAC*, five Justices of the Supreme Court voted to reject a claim against

a redistricting plan drawn "with the sole purpose of achieving a Republican congressional majority." 548 U.S. at 417 (opinion of Kennedy, J.). The record evidence here does not rise even to that "sole purpose" level, so any intent basis Plaintiffs intend to advance also fails as a matter of law. Accordingly, the Court should grant summary judgment and dismiss Plaintiffs' case in full at this time before the State of Ohio and various elected and appointed officials waste time and money trying a case to the same result.

FACTUAL BACKGROUND

Intervenors incorporate by reference the factual background and statement of undisputed facts Defendants have provided in support of their motion for summary judgment, which Intervenors join.

THE LEGAL STANDARD

"The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." Fed R. Civ. P. 56(a). Under well-established law, Rule 56 places an "initial burden" on the moving party of "'showing'—that is, pointing out to the district court—that there [is] an absence of evidence to support [the non-moving party's] case." *Peterson v. Johnson*, 714 F.3d 905, 910 (6th Cir. 2013) (quoting *Celotex Corp. v. Catrett*, 477 U.S. 317, 325 (1986)). "After that showing, the burden then shift[s] to [the non-moving party] to 'designate specific facts showing that there [is] a genuine issue for trial.'" *Id.* (quoting *Celotex*, 477 U.S. at 324). Importantly, "[t]he moving party *need not support its motion with evidence*." *Employers Ins. of Wausau v. Petroleum Specialties, Inc.*, 69 F.3d 98, 102 (6th Cir. 1995) (emphasis added). Rather, it is sufficient that the moving party simply point out the "absence of evidence to support the nonmoving party's case." *Id*. (quoting *Celotex*, 477 U.S. at 325).

Thus, "[w]here the nonmovant bears the ultimate burden of persuasion on a particular issue…the requirements that Rule 56 imposes on the moving party are not onerous." *Modrowski v. Pigatto*, 712 F.3d 1166, 1168 (7th Cir. 2013). The moving party can shift the burden "by asserting that the nonmoving party will be unable to present evidence supporting his claim." *Denney v. Steak N Shake Operations, Inc.*, 559 F. App'x 485, 487 (6th Cir. 2014) (citing *Celotex Corp.*, 477 U.S. at 325). The burden "to introduce specific facts that demonstrate the existence of a genuine issue precluding summary judgment" then falls on "the nonmovant." *Denney v. Steak N Shake Operations, Inc.*, 559 F. App'x 485, 487 (6th Cir. 2014) (citing *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.,* 475 U.S. 574, 586 (1986)).

ARGUMENT

Although the Court's motion-to-dismiss ruling was correct that no single Supreme Court decision "stands for the proposition that partisan gerrymandering claims are per se nonjusticiable," (Denial Order, ECF No. 61 at 5, PageID #657), it does not follow from this either that Plaintiffs' claims are justiciable or that they are entitled to relief here. Instead, this uncertainty places the additional burden on Plaintiffs to propose and establish a manageable standard to apply to their claims. As the Court explained, Plaintiffs "will need to articulate a test that allows the Court to determine whether the level of asymmetry or inefficiency rises to an unconstitutional level." (*Id.* at 14 n.4, PageID #666). Only then can the case proceed to the merits.

This threshold burden comes from the opinions of Justice Kennedy—to which the mere hope of a justiciable claim is entirely indebted—and is the *sine qua non* of a viable cause of action. In *Vieth v. Jubelirer*, four Justices concluded that "neither Article I, § 2, nor the Equal Protection Clause, nor…Article I, § 4, provides a judicially enforceable limit on the political considerations that the States and Congress may take into account when districting." 541 U.S. 267, 305 (2004). Justice Kennedy, however, concurred on narrower grounds, deciding not to "foreclose all

possibility of judicial relief if some limited and precise rationale were found to correct an established violation of the Constitution in some redistricting cases," but rejecting the claim before the Court because "no such standard has emerged in this case." *Id.* at 306, 311 (Kennedy, J., concurring). Because the *Vieth* plaintiffs failed to provide a standard, their case failed—on a motion to dismiss. *Id.* at 313 (citing Fed. R. Civ. P. 12(b)(6)); *see also LULAC*, 548 U.S. at 418 (rejecting claim for plaintiffs' failure to identify "a burden, as measured by a reliable standard, on the complainants' representational rights").[2]

Plaintiffs here, even after months of discovery and millions of dollars in reported fees and expenses,[3] have done no better because they, too, have failed to "show a burden, as measured by a reliable standard, on the complainants' representational rights." *LULAC*, 548 U.S. at 418. That is true both of their apparent effort to prove some type of unconstitutional effect and of their apparent effort to prove some type of unconstitutional intent.

I. Plaintiffs Have Failed To Identify and Satisfy a Manageable Standard of Unconstitutional Effect

Plaintiffs apparently intend to rely on the testimony of various social scientists to demonstrate that the 2011 Ohio congressional districts impose an unconstitutional effect. But, though elaborate, the methods of these experts differ in no material way from the "partisan-bias" metric Justice Kennedy rejected in *LULAC*—in fact, one expert proposes the *very same* method

[2] This brief focuses on Justice Kennedy's opinions in *Vieth* and *LULAC* because, on the relevant issues, these opinions provide the narrowest grounds for the Supreme Court's rejection of the claims before it, and they therefore bind this Court under *Marks v. United States*, 430 U.S. 188, 193 (1977). To be sure, five votes were reached on several holdings in both cases, so Defendants, in relying on Justice Kennedy's opinions, in no way waive the right to argue that other opinions are controlling on specific issues that may arise in this case.

[3] Plaintiffs notified the parties pursuant to this Court's standing order regarding recovery of attorney fees that, as of the end of August 2018, they had incurred over $3 million in legal fees and expenses.

here. In *LULAC*, Justice Kennedy directly and at length addressed the partisan-bias metric, which modeled "the extent to which a majority party would fare better than the minority party, should their respective shares of the vote reverse." 548 U.S. at 420 (opinion of Kennedy, J.). Justice Kennedy, first, criticized this method as relying on "a hypothetical state of affairs." *Id*. Then, that defect aside, Justice Kennedy found it dispositive that the partisan-symmetry metric failed to establish "a standard for deciding how much partisan dominance is too much." *Id.* That failure occurred because, even assuming the modeling of election results under counterfactual, statistically created scenarios was accurate and meaningful—a premise Justice Kennedy doubted—the method provided no clear means of identifying a tipping point between a legitimate and illegitimate bias. *See id.*

Although Plaintiffs might be able to claim a more elaborate presentation here, given their plethora of methods, they cannot credibly claim to have identified that necessary standard because none of their methods, separately or together, provide this Court, the State of Ohio, or anyone else a line by which to distinguish a constitutional plan from an unconstitutional one. There is therefore an absence of material evidence on the record to satisfy Plaintiffs' burden to show a manageable standard. *See Celotex*, 477 U.S. at 324–25. As Defendants explain at length (and Intervenors will not repeat here), Plaintiffs' experts have all expressly disclaimed an ability to identify a standard or point at which the burden of a districting plan on a party's electoral prospects becomes constitutionally unacceptable.

And there is good reason for those concessions: the methods Plaintiffs' experts provide are conceptually incapable of providing such a standard, as the Supreme Court's rulings (and, in particular, Justice Kennedy's opinions) contemplate. That is because the various baseline points

Plaintiffs' experts draw for comparison have nothing to do with the Constitution—and that is so in two distinct senses.

First, the methods provide no principled basis—under "the manner traditional for English and American courts," *Vieth*, 541 U.S at 278 (plurality opinion)—for differentiating constitutional and unconstitutional plans. Take, for example, the assertion of Professor Warshaw that the Ohio plan is historically an "outlier" in terms of partisan asymmetry. (*See* Defendants' Mot. for Summ. Judgment at Ex. 32, ECF No. 139-4, Warshaw Dep., at 64–65, PageID #4511-4512). The problem with this is that there is no constitutionally cognizable principle mandating that a certain percentage of state redistricting plans be deemed unconstitutional. Accordingly, the fact that a specific plan falls somewhere in some identified distribution of those plans bears no independent significance. Further, reliance on a statistical comparison of the challenged law with thousands of other laws would make constitutional rights depend on where on the Bell curve a law lies; a slightly less-restrictive obscenity law in another town passes constitutional muster so long as Akron's more-restrictive law is on the books; if the Akron law is struck down or repealed, the town's law becomes the "outlier" and is vulnerable. And so it would inevitably go with redistricting. That is not how constitutional analysis works.

Rather, the assessment is made according to objective standards.[4] Similarly, because it is legally presumed that *no* redistricting plan that Professor Warshaw identifies as a point of comparison has been sufficiently asymmetrical so as to violate the Constitution, merely calling the

[4] Of course, if the law is more restrictive than a law *invalidated by a federal court*, that might suggest it is unconstitutional. But none of the plans Professor Warshaw identifies have ever been conclusively invalidated. *Stare decisis* only applies in this way *after* a court has identified and applied a standard in prior cases, not *before*. The simple comparison with what other states have done in no way identifies a standard that a federal court would apply in interpreting the Constitution.

Ohio plan "worse" than those plans does not identify a manageable standard.[5] By the same token, statutes can be more restrictive in some senses and less in others, so even a statute more restrictive than statutes historically have been in one sense may be less restrictive in others. That is why courts (at least those acting "in the manner traditional for English and American courts") do not decide constitutional cases by comparing one state's choice with another's or with past choices; they apply objective principles. Professor Warshaw's method provides no such principles.

A similar problem inheres in Professor Cho's analysis, which compares the Ohio plan to billions of computer-generated alternative maps. (*See generally* Defendants' Mot. for Summ. Judgment, ECF No. 136, at 6-7, PageID #3551-3552). The problem here is that those billions of maps must be generated by an algorithm and, of necessity, by *one* algorithm and not *another* algorithm. And Professor Cho (and Plaintiffs themselves) fails to explain why the algorithm Professor Cho utilized establishes a constitutional norm. By comparison, no one would seriously contend that Akron's obscenity statute is unconstitutional just because a supercomputer can generate billions of different possible obscenity statutes. For one thing, it may not be clear that those billions of alternatives are themselves lawful. For another, the possibility that a state statute may be *different* does not itself contain a standard for establishing that it violates some constitutional norm.

Second, Plaintiffs' expert methods fail to identify a manageable standard appropriate to enforcing the equal-protection and free-speech guarantees they assert as the bases of their claims.

[5] Under "the presumption of good faith that must be accorded legislative enactments," all redistricting plans, even those suspected of *racial* bias, are presumptively constitutional without a "sufficient" "showing" to the contrary. *Miller v. Johnson*, 515 U.S. 900, 915–16 (1995). Because no plan has conclusively been ruled to violate the federal Constitution on partisanship grounds, the Court is legally required to assume that every plan Professor Warshaw identifies as a point of comparison is constitutionally compliant with whatever partisan-fairness metrics the Constitution may impose.

It is not enough that a standard be "manageable" in a vacuum; any standard could qualify under that nonsensical rubric simply by imposing a bright-line rule—e.g., everyone over six feet tall gets executed. Instead, the standard must be implicitly, if not explicitly, contained in the Equal Protection Clause or the First Amendment.[6] But, as the Supreme Court explained recently, these and similar constitutional provisions protect individual rights, so a method that measures the effect on "group political interests, not individual legal rights," *Gill*, 138 S. Ct. at 1933, necessarily fails to enforce or elaborate on these constitutional provisions. Accordingly, the Supreme Court in *Gill* expressly criticized methods offered yet again here, partisan symmetry and the efficiency gap, as measuring a burden only as applied to the "fortunes of political parties." *Id.* at 1933. The problem with all these techniques, then, is that they provide "an average measure," not "the effect that a gerrymander has on the votes of particular citizens." *Id.* That is the problem again here: Plaintiffs are litigating this case with average measures.[7] That does not satisfy their burden of showing a standard for adjudicating individual-rights claims.

B. Plaintiffs Failed To Either Provide a Standard for Adjudicating Impermissible Partisan Intent or Evidence Exceeding the Levels of Intent Previously Found Non-Actionable

Aside from failing to articulate and prove an unconstitutional effect under a manageable standard, Plaintiffs have not established a standard by which to adjudicate unconstitutional intent. Although they have focused their litigation efforts on identifying facts to support some type of

[6] As Defendants explain in their Motion for Summary Judgment, Plaintiffs' Article I, § 4 claim is, if anything, an even weaker basis for a partisan-gerrymandering cause of action than are the First and Fourteenth Amendments. Intervenors do not repeat those arguments here.

[7] Although *Gill* did not directly address justiciability, its reasoning on Article III standing applies with equal, if not enhanced, force to the merits because the First and Fourteenth Amendments do not protect "the fortunes of political parties" any more than Article III does. *Gill*, 138 S. Ct. at 1933. The Court therefore should be guided heavily by the *Gill* decision in assessing the merits of Plaintiffs' claim.

intent claim—for example, by expending an enormous sum of time and money trying to show that Republicans attempted to win Ohio legislative seats in 2010 to control redistricting—they have identified no standard for adjudicating what degree of partisan motive is too much. And their evidence is woefully short under the guidance the Supreme Court has given on this subject.

The defect on this element results, first, from the Supreme Court Justices' broad agreement that *some* degree of partisan motive is permissible; "the issue is one of how much is too much." *Vieth*, 541 U.S. at 344 (Souter, J., dissenting). That should come as no surprise when the Supreme Court has expressly advised the federal courts "to assume that those who redistrict and reapportion work with both political and census data" and that they do so "to achieve the political ends of the State, its constituents, and its officeholders." *Gaffney v. Cummings*, 412 U.S. 735, 754 (1973). Plaintiffs' apparently forthcoming effort to prove that Ohio legislators used political data cannot, as a matter of law, establish unconstitutional motive without identifying (1) a standard for showing "how [this] otherwise permissible classification [politics], as applied, burdens representational rights," *Vieth*, 541 U.S. at 314 (Kennedy, J., concurring), and (2) evidence to satisfy that burden. As far as Intervenors can tell, the record is bereft of any evidence supporting either of those burdens. That absence of evidence—alone sufficient for summary judgment, *Celotex*, 477 U.S. at 324–25—is underscored in that it is an undisputed fact that "[a] majority of Democrats in both houses of the Ohio General Assembly voted for" the 2011 plan. (Defendants' Prop. Stmt. of Undisputed Material Facts, ECF No. 136-1, at ¶ 2, PageID #3579).

The defect in Plaintiffs' claim on this element results, secondly, from the Supreme Court's having definitively rejected the standards litigants might otherwise propose. For example, litigants have tried to utilize the law of invidious racial intent as providing the standard in partisan cases, but Justice Kennedy has expressly rejected that comparison:

> That courts can grant relief in districting cases where race is involved does not answer our need for fairness principles here. Those controversies implicate a different inquiry. They involve sorting permissible classifications in the redistricting context from impermissible ones. Race is an impermissible classification. Politics is quite a different matter.

Vieth, 541 U.S. at 307 (Kennedy, J., concurring) (citations omitted). Thus, Justice Kennedy joined the four-Justice plurality in rejecting the contention that the "predominance" test used in racial-gerrymandering cases should apply in partisan-gerrymandering cases. *See id.* at 286 (plurality opinion) (criticizing the proposed political predominance test as "both dubious and severely unmanageable"); *id.* at 307 (Kennedy, J., concurring). That, by necessary implication, also precludes the *lower* "substantial factor" test used in standard racial discrimination cases, under precedents such as *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252, 266 (1977).

That leaves one other option: a *sole* factor test. Yet, even on that test, Justice Kennedy has not been persuaded. In *LULAC*, the Supreme Court rejected a partisan-gerrymandering claim challenging a far more egregious seizure of redistricting power than Plaintiffs here have even alleged. In *LULAC*, the Texas legislature chose to redistrict in the middle of the decade, when there was *no* legal obligation to redistrict. Justice Kennedy agreed with the *LULAC* plaintiffs that the "legislature does seem to have decided to redistrict with the sole purpose of achieving a Republican congressional majority." 548 U.S. at 417 (opinion of Kennedy, J.). But even that did not suffice. In the legally binding opinion, Justice Kennedy rejected the claim because "partisan aims did not guide *every line* [the legislature] drew." *Id.* (emphasis added). It was not enough to show that the sole purpose of engaging in the redistricting was for partisan gain; without proof that it guided every single line, the intent standard was not met.

Plaintiffs here are nowhere close to showing the level of partisanship present in *LULAC*, and they certainly have no basis to claim their evidence has *surpassed* that level. Here, the

legislature did not decide "to redistrict with the sole purpose of achieving a Republican congressional majority"; rather, the legislature was legally obligated to redistrict because new census data rendered Ohio's congressional plan in violation of the Equal Protection Clause. And there is no evidence that "partisan aims" guided "every line it drew." As noted, a majority of Democratic Party representative in both state houses *voted for* the 2011 plan. Defendants respectfully submit that there is no evidence on the record of partisan motive even reaching, let alone surpassing, the motive present in *LULAC*, and it is therefore Plaintiffs' burden on summary judgment to identify that evidence. *See Celotex*, 477 U.S. at 324–25. Plaintiffs' claim must fail.

C. Even if the Court Disagrees, It Should Require Plaintiffs To Identify the Legal Tests they Believe Apply to Their Claims

At a bare minimum, the Court should require Plaintiffs to identify the elements they believe underlie the causes of action they intend to attempt to prove. The need for such clarity is plain from partisan-gerrymandering cases like *Agre v. Wolf*, 284 F. Supp. 3d 591 (E.D. Pa.), *appeal dismissed as moot*, 138 S. Ct. 2576 (2018), which failed to hold the plaintiffs to a requirement of identifying their claims and, as a result, issued a confusing three-way-split decision that depended on practically *none* of the evidence the parties submitted.

In that case, the court (rightly) issued an order requiring the parties to identify the elements the plaintiffs should be required to prove on each claim. Order at 1, *Agre v. Wolf* (No. 17-cv-04392-MMB), ECF No. 104 (E.D. Pa.). On the eve of trial, the Court issued a second order, observing that the plaintiffs' submission was "inconsistent and not sufficiently specific as to what elements of proof their evidence must contain." Order for Pls. To Clarify Elements of Proof at 1, *Agre v. Wolf* (No. 17-cv-04392-MMB), ECF No. 169. But, rather than dismiss the relevant claims as Justice Kennedy's controlling opinions required, the court gave the plaintiffs a second chance, and they submitted a second round of contradictory proposed elements. In the end, after trial on

the merits, the judges took three dramatically different approaches to the claim—one found it non-justiciable, a second found that the plaintiffs lacked standing, and a third found a violation on a handful of districts—and the judges were largely in agreement that their opinions depended on little if any on the evidentiary presentations. *Agre*, 284 F. Supp. 3d at 594 (Smith, C.J.) (stating he would reject claims as a matter of law); *see id.* at 639 (Schwartz, J.) (stating she would reject claims based on the lack of evidence to support standing); *id.* at 719 (Baylson, J., dissenting) (stating that he would invalidate certain districts based almost entirely on a visual inspection of the districts, nothing more). This meant that the time-consuming trial work of legal counsel and the extensive costs of the litigants was largely wasted on what the court ultimately concluded, albeit each judge for his or her own reasons, was a case amenable to adjudication on the law, rather than on the facts.

The Court should not conduct a trial in which the litigants are blind as to the governing legal principles. That would not be economical for either the Court or the parties. It is counterproductive to require litigants to proceed to trial with little to no idea of what elements Plaintiffs must prove to prevail on their claims. That is particularly true here, where Plaintiffs bear the burden of identifying the applicable standard and proving the 2011 Plan violates that standard. Basic due process requires that the standard be announced before the trial, not after the close of evidence.

CONCLUSION

For the above-stated reasons and those stated in Defendants' brief, the Court should grant Defendants' summary judgment motion, which Intervenors join, and dismiss all of Plaintiffs' claims.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2019, 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.

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