IN THE SUPREME COURT OF OHIO

LEAGUE OF WOMEN VOTERS OF OHIO, *et al.*, *Relators*, *v.* OHIO REDISTRICTING COMMISSION, *et al.*, *Respondents*.	Case No. 2021-1193
BRIA BENNETT, *et al.*, *Relators*, *v.* OHIO REDISTRICTING COMMISSION, *et al.*, *Respondents*.	Case No. 2021-1198
THE OHIO ORGANIZING COLLABORATIVE, *et al.*, *Relators*, *v.* OHIO REDISTRICTING COMMISSION, *et al.*, *Respondents*.	Case No. 2021-1210

AFFIDAVIT OF FREDA J. LEVENSON

EVIDENCE OF RELATORS – WRITTEN DISCOVERY RESPONSES

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F. Levenson Affidavit Written Discovery Responses.pdf

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E-Signature 1: Freda J. Levenson (FJL)
October 21, 2021 14:53:13 -8:00 [500091DF1BF1] [74.64.96.68]
flevenson@acluohio.org (Principal) (Personally Known)

E-Signature Notary: Theresa M Sabo (TMS)
October 21, 2021 14:53:13 -8:00 [7AC0590665E6] [74.142.214.254]
tess.sabo@gmail.com
I, Theresa M Sabo, did witness the participants named above electronically sign this document.

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Affidavit of Freda J. Levenson

Franklin County
/ss
State of Ohio

I, Freda J. Levenson, having been duly sworn and cautioned according to law, hereby state that I am over the age of eighteen years and am competent to testify as to the facts set forth below based on my personal knowledge and having personally examined all records referenced in this affidavit, and further state as follows:

1. In each of the above-captioned cases (Nos. 2021-1193, 2021-1198, and 2021-1210), the Ohio Supreme Court has entered an order providing that parties shall file any evidence they intend to present no later than Friday, October 22, 2021.

2. I am one of the counsel for Relators in the above captioned matter, Case Number 2021-1193.

3. In the days after filing the complaint in this matter, I served discovery requests on Respondents, for documents, interrogatories, and requests for admissions related to this case, as did Counsel for Relators in the other above-captioned cases.

4. The documents contained in the attached Appendix of Exhibits are true and correct copies of the discovery responses received by all Relators in response to such discovery requests. The Index at the beginning of the Appendix, also copied below, gives a description of each document and states where it appears in the Appendix.

ITEM	DESCRIPTION	BATES RANGE	CASE NUMBER
1	Respondent Governor Michael Dewine's Responses to First Set of Requests for Admission, dated October 12, 2021	RESP_0001-RESP_0012	2021-1193

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2	Respondent Secretary of State Frank Larose's First Set of Requests for Admission, dated October 12, 2021	RESP_0013-RESP_0024	2021-1193
3	Respondent Auditor Of State Keith Faber's Responses to Relators' First Set of Requests for Admission, dated October 12, 2021	RESP_0025-RESP_0035	2021-1193
4	Respondent Governor Dewine's Responses to Relators' Requests for Production of Documents, dated October 12, 2021	RESP_0036-RESP_0044	2021-1193
5	Respondent Secretary of State Frank Larose's Responses to Relators' Requests for Production of Documents, dated October 12, 2021	RESP_0045-RESP_0053	2021-1193
6	Respondent Huffman's Objections and Responses to Relators' First Set of Requests for Production Of Documents to Respondent Senate President Matthew Huffman, dated October 12, 2021	RESP_0054-RESP_0064	2021-1193
7	Respondent Auditor of State Faber's Responses to Relators' Requests for Production of Documents, dated October 12, 2021	RESP_0065-RESP_0073	2021-1193
8	Respondent Cupp's Objections and Responses to Relators' First Set of Requests for Production of Documents to Respondent House Speaker Robert R. Cupp, dated October 12, 2021	RESP_0074-RESP_0083	2021-1193
9	Respondent House Minority Leader Emilia Sykes' Response to Relators' First Set of Interrogatories and First Request for Production of Documents, dated October 15, 2021	RESP_0084-RESP_0104	2021-1193
10	Respondent Senator Vernon Sykes' Responses to Relators' First Set of Interrogatories and First Request for Production of Documents, dated October 15, 2021	RESP_0105-RESP_0123	2021-1193
11	Respondent Ohio Governor DeWine's Response to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0124-RESP_0135	2021-1193
12	Respondent Governor Michael Dewine's Responses to Second Set of Interrogatories, dated October 12, 2021	RESP_0136-RESP_0144	2021-1193

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13	Respondent Ohio Secretary of State Frank LaRose's Response to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0145-RESP_0156	2021-1193
14	Respondent Secretary of State Frank Larose's Responses to Relators' Second Set of Interrogatories, dated October 12, 2021	RESP_0157-RESP_0165	2021-1193
15	Respondent Huffman's Objections And Responses to Relators' First Set of Interrogatories to Respondent Senate President Matthew Huffman, dated October 12, 2021	RESP_0166-RESP_0172	2021-1193
16	Respondent Auditor of State Keith Faber's Responses to Relators' Second Set of Interrogatories, dated October 12, 2021	RESP_0173-RESP_0182	2021-1193
17	Respondent Ohio Auditor of State Keith Faber's Response to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0183-RESP_0196	2021-1193
18	Respondent Cupp's Objections and Responses to Relators' First Set of Requests for Production of Documents to Respondent House Speaker Robert R. Cupp, dated October 12, 2021	RESP_0197-RESP_0206	2021-1193
19	Respondent Cupp's Objections and Responses to Relators' First Set of Interrogatories to Respondent House Speaker Robert R. Cupp, dated October 12, 2021	RESP_0207-RESP_0213	2021-1193
20	Respondent Governor Dewine's Responses to Relators' Requests for Production of Documents, dated October 12, 2021	RESP_0214-RESP_0219	2021-1198
21	Respondent Auditor of State Faber's Responses to Relators' Requests for Production of Documents, dated October 12, 2021	RESP_0220-RESP_0225	2021-1198
22	Respondent Secretary of State Frank Larose's Responses to Relators' Requests for Production of Documents, dated October 12, 2021	RESP_0226-RESP_0231	2021-1198
23	Respondent Governor Dewine's Responses to Relators' First Set Of Interrogatories, dated October 12, 2021	RESP_0232-RESP_0245	2021-1198
24	Respondent Auditor of State Keith Faber's Responses to Relators' First Set of	RESP_0246-RESP_0257	2021-1198

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	Interrogatories and Requests for Production, dated October 12, 2021		
25	Respondent Secretary of State Frank Larose's Responses to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0258-RESP_0269	2021-1198
26	Respondent Huffman's Objections and Responses to Relators' First Set of Discovery to Respondent Senate President Matthew Huffman, dated October 12, 2021	RESP_0270-RESP_0279	2021-1198
27	Respondent Cupp's Objections and Responses to Relators' First Set of Discovery to Respondent House Speaker Robert R. Cupp, dated October 12, 2021	RESP_0280-RESP_0289	2021-1198
28	Respondent Senator Vernon Sykes' Response to Relators' First Set of Interrogatories, dated October 15, 2021	RESP_0290-RESP_0300	2021-1210
29	Respondent The Ohio Redistricting Commission's Responses To Relators' First Set Of Interrogatories And First Set Of Requests For Production To The Ohio Redistricting Commission, dated October 12, 2021	RESP_0301-RESP_0322	2021-1210
30	Respondent Governor Dewine's Responses to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0323-RESP_0335	2021-1210
31	Respondent Ohio Secretary of State Frank Larose's Responses to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0336-RESP_0346	2021-1210
32	Respondent Faber's Responses to Relators' First Set of Interrogatories, dated October 12, 2021	RESP_0347-RESP_0358	2021-1210
33	Respondent House Minority Leader Emilia Sykes' Response to Relators' First Set of Interrogatories, dated October 15, 2021	RESP_0359-RESP_0368	2021-1210
34	Respondent Huffman's Objections and Responses to Relators' First Set of Interrogatories to Respondent Senate President Matthew Huffman, dated October 12, 2021	RESP_0369-RESP_0376	2021-1210
35	Respondent Cupp's Objections and Responses to Relators' First Set of Interrogatories to Respondent House Speaker Robert R. Cupp, dated October 12, 2021	RESP_0377-RESP_0383	2021-1210

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36	Respondent House Minority Leader Emilia Sykes' Responses to Respondents Matt Huffman And Robert Cupp's First Set of Interrogatories and First Request for Production of Documents, dated October 15, 2021	RESP_0384-RESP_0403	2021-1193 2021-1198 2021-1210
37	Respondent Senator Vernon Sykes' Response to Respondents Matt Huffman and Robert Cupp's First Set of Interrogatories and First Request for Production of Documents, dated October 15, 2021	RESP_0404-RESP_0422	2021-1193 2021-1198 2021-1210
38	Verification Pages to Respondent Cupp's Interrogatory Responses for Case Nos. 2021-1193, 2021-1198, 2021-1210, dated October 13, 2021	RESP_0423-RESP_0424	2021-1193 2021-1198 2021-1210
39	Verification Pages to Respondent Huffman's Interrogatory Responses for Case Nos. 2021-1193, 2021-1198, 2021-1210, dated October 13, 2021	RESP_0425-RESP_0426	2021-1193 2021-1198 2021-1210

Notarial act performed by audio-visual communication

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Freda J. Levenson

Sworn to and subscribed before me this 10/21/2021 day of October, 2021

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N

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CERTIFICATE OF SERVICE

I, Freda J. Levenson, hereby certify that on October 22, 2021, I caused a true and correct copy of the following documents to be served by email upon the counsel listed below:

1. **Affidavit of Freda J. Levenson – Written Discovery Responses**
2. **Written Discovery Responses, Appendix of Exhibits, Volume 1 of 2 (pages 1 - 289)**
3. **Written Discovery Responses, Appendix of Exhibits, Volume 2 of 2 (pages 290 - 426)**

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