IN THE SUPREME COURT OF OHIO

League of Women Voters of Ohio, *et al.*, Petitioners, v. Ohio Redistricting Commission, *et al.*, Respondents.	Case No. 2021-1193
Bria Bennett, *et al.*, Petitioners, v. Ohio Redistricting Commission, *et al.*, Respondents.	Case No. 2021-1198
Ohio Organizing Collaborative, *et al.*, Petitioners, v. Ohio Redistricting Commission, *et al.*, Respondents.	Case No. 2021-1210

RESPONDENTS MCCOLLEY AND LARE'S CORRECTED MEMORANDUM IN OPPOSITION TO MOTIONS FOR LEAVE TO FILE OBJECTIONS WITH SUPPORTING AFFIDAVIT OF MICHAEL BARBER

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INTRODUCTION

On September 26, 2023, the Ohio Redistricting Commission (the "Commission") unanimously adopted the Unified Bipartisan Redistricting Plan (the "Plan") by a vote of 7-0. Thereafter, the Commission approved, by a vote of 6-0, a technical amendment to the Plan to reflect its original intent and then filed a copy of the Plan with the Ohio Secretary of State and this Court. Some, but not all, of the Petitioners in these three cases (the "Objectors") have moved for leave to file objections to the Plan ("Motions for Leave"). The Court should deny the motions.

Article XI of the Ohio Constitution is designed to constrain the partisan manipulation of district lines in two ways. First, the Constitution focuses the General Assembly redistricting process on geographic inputs, rather than political outputs. That is why the mandatory provisions of Article XI—the things the Commission "shall" do in Sections 2, 3, 4, 5, and 7—make counties, municipalities, and townships the fundamental building blocks of Ohio House districts, and House districts then form the fundamental building blocks of Ohio Senate districts. Second, the Constitution incentivizes the two major political parties to negotiate and compromise by ensuring a redistricting plan that garners bipartisan support is effective through the next decennial census. By contrast, a redistricting plan that fails to receive bipartisan support is valid only for two election cycles, which allows for intervening elections to change the Commission's composition.

The geographic anti-gerrymandering provisions ensure that people who live together will vote together. By instead focusing solely on the proportionality provision of Section 6(B), the Objectors' get this process exactly backwards. Again. And through this inverted approach, each set of objections *reflects* partisan ends rather than fidelity to the Constitution (and ultimately the People) and *demands* "gerrymandering" by judicial fiat.

In 82 of Ohio's 88 counties—where 58% of Ohioans live—the Constitution's mandatory, neutral, geographic requirements of Sections 2-5 and 7 command how districts are constructed, and the political output will be what it will be. Because Objectors know that they cannot find more Democrat-leaning district in those 82 counties, they are content to have those neutral requirements apply in those 82 counties. But because the other 42% of Ohioans live in the remaining six urban counties (Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit), Objectors demand that the Commission begin with their preferred political outputs, and then draw lines necessary to achieve those preferences. That methodology violates Article XI. To be clear, the Objectors' preferred political output is nearly uniformly Democratic-leaning seats across those six counties, notwithstanding the fact that 41% of the voters in those counties vote for Republican candidates in statewide elections. Objectors demand that the Commission pack and crack the 41% who vote Republican to ensure they cannot elect more than 12-15% of those counties' representatives to the House and 24-29% to the Senate. Article XI is expressly meant to preclude that kind of naked district manipulation, not to require it.

In addition to their demand for partisan district manipulation, Objectors' motions attempt to sidestep a series of inconvenient facts. First, Objectors have neither alleged nor identified any violation of Sections 2, 3, 4, 5, or 7 of Article XI—and they never have. Without a violation of any of those sections, the Court lacks jurisdiction to hear the objections in the first place.

Second, Objectors seek leave to file objections to the Plan—rather than file, for example, an amended complaint—so that they do not have to account for either the 2022 election or the fact that the Plan was adopted unanimously. Objectors do not want to have to explain to this Court how a bipartisan, unanimously adopted plan amounts to a partisan gerrymander. Moreover, the 2022 election significantly impacts any analysis of their desired statewide

proportionality under Article XI, § 6(B) and demonstrated that the Objectors' purportedly perfectly proportional plan was illusory. As a consequence, the Court's prior demand for precise proportionality was always an impossible errand. And the unanimous adoption of the Plan means that the Court cannot rely on the impasse procedure analysis in Article XI, § 9(D)(3)(c)—eroding the Court's basis for exercising jurisdiction over the original complaint.

Third, Objectors invoke stare decisis and "law of the case" in a case for which there has never been a final order. Those arguments are foreclosed by Civil Rule 54(B), and Objectors raise those arguments solely to avoid defending the fact that their objections would lead to the most aggressive partisan district manipulation favoring Democrats and disfavoring Republicans.

In short, Objectors continue to demand the very thing they accuse the Commission of, that is "gerrymandering." Article XI neither authorizes the Commission to do that, nor authorizes the Court to order it. The Court should deny the Motions for Leave.

FACTUAL BACKGROUND

On September 13, 2023, the Commission convened to address the open issue of General Assembly redistricting. Following organizational meetings, introduction of a Commission plan, the filing of other proposed plans, public hearings on the various plans, and public discussions and debate, the Commission met on September 26, 2023, and unanimously adopted the Plan by a vote of 7-0, with both Democrats and Republicans voting together.[1] Thus, the Plan meets the requirements of Article XI, § 1(B)(3) and will be effective through the 2030 election.

[1] The Ohio Channel, *Ohio Redistricting Commission – 9-26-2023*, at 2:29:40-2:32:05, https://www.ohiochannel.org/video/ohio-redistricting-commission-9-26-2023.

On September 29, 2023, the Commission briefly reconvened to consider one technical amendment to the Plan. The Commission adopted that amendment and reaffirmed its adoption of the Plan, as amended, 6-0, with Governor DeWine unable to attend. The Ohio Channel, *Ohio Redistricting Commission – 9-29-2023*, https://www.ohiochannel.org/video/ohio-redistricting-

On October 2, 2023, the Commission filed the Plan with this Court. Objectors promptly filed their Motions for Leave in each of the lawsuits, which motions are now ripe for decision.

ANALYSIS OF LAW

1. Objectors' challenges fail because their interpretation of Section (B) forces unconstitutional packing and cracking of Republican voters in Ohio's six largest urban counties.

Objectors believe that Article XI, § 6(B) requires "representational fairness," which they define as strict proportional representation, based on the partisan index of each district, in the General Assembly. As a result, their proposed objections all focus on the purported failure of the Plan to achieve that strict proportionality. *E.g*., Ohio Organizing Collaborative's Proposed Objection ("OOC Objection"), at 1. Their arguments are simply wrong.

First, Objectors point to the partisan index of each district as if it were some sacrosanct talisman, capable of foretelling the future. It is not. The 64th House district in Trumball County, under Map 3 on which the 2022 election was held, had an index of 44% Republican, 56% Democrat. Yet Republican Nick Santucci won the election. Similar examples abound of candidates, their issues, and campaigns making the difference. In 2020, Joe Biden carried the 16th Senate District with 58% support while Republican Stephanie Kunze won the State Senate seat. https://www.ohiosos.gov/elections/election-results-and-data/2020/.

Further, Article XI makes no mention of *strict proportionality*, *proportional representation*, *representational fairness*, or any other catch phrase Objectors believe Section 6(B) requires. And 6(B) itself is but one of three subparts of Article XI, Section 6:

> The Ohio redistricting commission ***shall attempt to draw*** a general assembly district plan that ***meets all of*** the following standards:

commission-9-29-2023. Later that same day, the Commission filed the Plan with the Secretary of State.

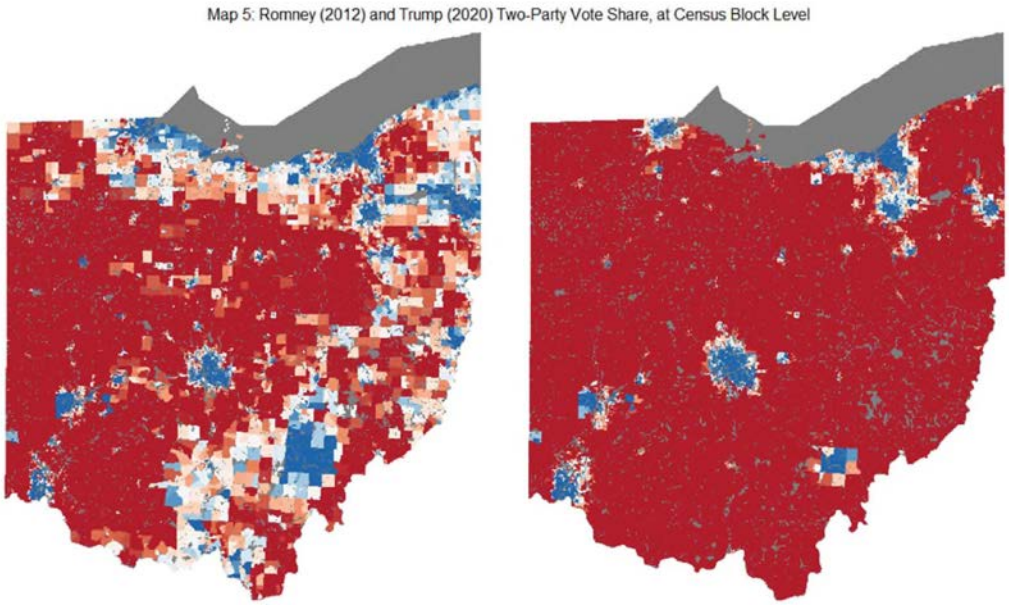
> (A) No general assembly district plan ***shall be drawn primarily to favor or disfavor a political party***.
>
> (B) The statewide proportion of districts whose voters, based on statewide state and federal partisan general election results during the last ten years, favor each political party ***shall correspond closely*** to the statewide preferences of the voters of Ohio.
>
> (C) General assembly districts shall be compact.
>
> Nothing in this section permits the commission to violate the district standards described in Section 2, 3, 4, 5, or 7 of this article.

Objectors' sole focus is 6(B), which leads them to think (mistakenly) that a district plan must, in aggregate, provide that 54-56% of the districts be Republican-leaning and 44-46% Democrat-leaning.[2] OOC Objection, at 7-8; Bennett Objection, at 7; League of Women Voters' Objection, at 1-2. However, Article XI clearly directs that the Commission "shall attempt" to meet ***all three*** subparts of Section 6; not just 6(B). Nothing in the text or this Court's prior opinions allows one subpart to predominate over the others. To the contrary, the Commission is as equally obligated to attempt to comply with 6(A) and (C), as it is with 6(B). Moreover, while each of 6(A) and (C) include the mandatory "shall" do something, 6(B) only requires that preferences "shall correspond ***closely*** to the statewide preferences of the voters of Ohio." (Emphasis added.) It is not about meeting those preferences exactly, as Objectors wrongly contend, only to attempt to get close. And the reality in 2023 Ohio is that the closer a mapdrawer gets to the statewide preferences in 6(B), the more that mapdrawer must favor Democrats and disfavor Republicans who live in Ohio's urban counties contrary to the mandate of 6(A).

[2] While the 10-year period from 2012-2020 had Republicans winning 54.1% of the votes in statewide elections, Objectors acknowledge that the 10-year period prior to this redistricting effort, 2014-2022, had Republicans winning 56.4% of the votes in statewide elections. (Rodden Aff., ¶¶17-18, Bennett Objection, Exh. A.)

It is no secret that Democrats in Ohio congregate in the urban counties, or that the smaller cities, towns and rural parts of Ohio vote overwhelmingly for Republican candidates. The Objectors all rely on Dr. Jonathan Rodden, who has written extensively on the geographic distribution of voters and its impact on redistricting: "Democrats are highly clustered in dense central city areas, while Republicans are scattered more evenly through the suburban, exurban, and rural periphery." (Chen and Rodden, "Unintentional gerrymandering: Political geography and electoral bias in legislatures," 8 *Quarterly Journal of Political Science*, no. 3, p. 241 (2013).) Dr. Rodden has opined that "in some of the largest and most urbanized U.S. states, even without overt racial or partisan gerrymandering, the Democrats are at a disadvantage in translating votes to seats simply because their voters are inefficiently clustered in urban areas." (*Id*. at 262)

The reality of where voters choose to live in Ohio makes it incredibly difficult, without severe partisan manipulation, to draw districts in which Democrats can count on being competitive outside of Ohio's urban areas. Those trends have only intensified in recent years:[3]



[3] Expert Report of Sean Trende, HC_0672, Presentation of Evidence by Respondents Huffman and Cupp, Vol. IV, Oct. 22, 2021.

The blue areas are the major urban areas in Ohio, mostly Ohio's six largest urban counties—Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit.[4] Pretty much everything else—those other 82 counties—is red, and deep red. As the maps reflect, areas in south and eastern Ohio that sent Democratic icons Ted Strickland to the U.S. Congress and Vern Riffe to the General Assembly are today voting heavily Republican.

With 58% of Ohio's population, those 82 counties are represented by 57 House members. The challenge of drawing Democrat-leaning districts in those 82 counties? Huge. The Objectors all point to plans submitted to the Court by Dr. Rodden. *E.g.*, Bennett Objection, at 7-8 ("As before, [Objectors] point to the Rodden Plan and the Corrected Independent Map Drawers' Plan as two plans that fully comply with Sections 2, 3, 4, 5, and 7 and achieve near proportional representation as required by Section 6"). After accounting for the 2022 election, the Rodden Plan to which Objectors point includes only three Democrat-leaning House districts outside the six urban counties, and the Corrected Independent Map Drawers' Plan has four. (Barber Aff., ¶ 18, attached.) That is, even a partisan drawing maps to help Democrats can find only three or four Democrat-leaning House seats among the 57 seats outside the six urban counties.

To get to 44% proportional representation for the Democratic Party—which Objectors argue is the bare minimum to pass constitutional muster—a plan would need at least 43 Democrat-leaning House districts. Assuming Objector's expert is right and one could get as many as four of those outside the six urban counties, that means one would need to draw 39 Democrat-leaning House districts in the six urban counties. But there are only 42 House seats in

[4] The one other blue area is Athens County, but its population is about half of a House district, and it is surrounded by red areas so a Democrat-leaning Athens House district is not possible.

those six urban counties.[5] And, collectively, those six counties have voted 41% for statewide Republican candidates. (Barber Aff., ¶ 12.) The only way to make 39 of those 42 seats (93%) Democrat-leaning, is to use aggressive partisan-districting techniques by packing and cracking the 41% who vote Republican, so as to minimize their representation.[6]

While such an approach is directly contrary to Section 6(A)'s requirement of neutrality in drawing district lines, it turns out that even using classic gerrymandering tactics in Ohio's urban counties is not enough to achieve proportional representation, or whatever else the Objectors incorrectly read into Article XI. After considering the 2022 results, both the Rodden Plan and the Corrected Independent Map Drawers' Plan, to which Objectors point, include just 40 Democrat-leaning House districts. (Barber Aff., ¶16.) Even the Objectors' most advantageous, partisan-manipulated proposals fall short of their proportionality demands.

In the Senate, Objectors' prospects are even more bleak. Neither plan advanced by Dr. Rodden contains a single Democrat-leaning Senate district outside the six urban counties. (Barber Aff., ¶ 21.) To get to 44% of the Senate's 33 members, 15 of the 17 Senate districts (88%) in the six urban counties would need to be Democrat-leaning. In other words, more packing and cracking of the Republican voters. And Dr. Rodden's two partisan plans only get to 12-13 Senate seats (Barber Aff., ¶ 19.), well short of what Objectors errantly claim to be constitutionally required.

[5] The Plan includes 41 districts wholly contained in one of the six urban counties, and 3 districts that cross a county line: District 12 (Franklin, Madison, and Pickaway), District 23 (Cuyahoga and Lake), and District 35 (Summit and Portage). Of those three, only District 23 is predominately in an urban county.

[6] Hamilton County neatly illustrates the problem. Hamilton County can accommodate seven House districts. It is not possible to draw six or seven of those seats as Democrat-leaning when Republican candidates have won the county in two of the last three gubernatorial elections.

Objectors' demand for proportional representation means that for 82 counties and 58% of Ohioans, the Commission is to apply politically neutral, geography-based rules; *but* for the other six counties and 42% of Ohioans, the Commission must draw districts specifically to ensure that Democrats win nearly all of them—with nothing more than incidental concern for whether they comply with Sections 2-5 and 7 of Article XI, or make any sense against ordinary redistricting criteria.[7] Suffice it to say, such an approach plainly and intentionally favors one party over the other, which violates Section 6(A) of Article XI. And this Court has held that Section 6(A) is just as mandatory as Section 6(B). *League of Women Voters of Ohio v. Ohio Redistricting Comm.*, 167 Ohio St.3d 255, 2022-Ohio-65, ¶¶ 83-89, 115 ("*League I*").

The tension between subdivisions 6(A) and 6(B) is apparent. Stated simply, the closer a plan tries to get to the statewide preferences in Section 6(B), the more the plan necessarily disfavors Republican voters in Ohio's urban counties contrary to the requirements of Section 6(A). Thus, the Commission's Plan includes 30 Democrat-leaning House districts among the 42 districts in Ohio's six largest urban counties. (Barber Aff., ¶ 17). It thus leaves the 41% of Republican voters in those counties likely to elect only 29% of their House representation. Objectors say there must be more Democrat-leaning House seats across the state, yet the only place to find them is in those same six counties. Which is why Objectors argue that the 41% of Republican voters in those counties should only be able to elect 12-14% of their House representation. That position clearly favors Democrats and disfavors Republicans contrary to

[7] Drawing such a map would be extraordinarily difficult—if it is possible at all. And such a map would have unhealthy public policy implications. Objectors' demand would ensure that Ohio's exurban and rural areas are represented by one political party, while her major cities are represented almost exclusively by the other. Further, it would mean that Ohio's major cities will have virtually no representation in the political majority of the General Assembly. Objectors would needlessly and dangerously pit the urban areas of the state against the exurban and rural areas—to the detriment of these regions, both parties, and the state as a whole.

Section 6(A). The only way to reconcile the two divisions is to apply neutral principles to "correspond ***closely***" to the 6(B) ratio, recognizing that while exactitude is not required in 6(B), neutrality ***is*** required in 6(A). Objectors' fundamental premise, that the Plan fails under Section 6(B), is just wrong.

2. Objectors' challenges fail because nowhere do they claim that the Plan violates Sections 2, 3, 4, 5, or 7 of Article XI of the Ohio Constitution, without which this Court has no power to enforce the proportionality rule they advance.

None of the Objectors' attempts to invalidate the Plan allege—much less prove—that the Plan violates Sections 2, 3, 4, 5, or 7 of Article XI. That is fatal to their objections.

The Ohio Supreme Court has "exclusive, original jurisdiction in all cases arising under" Article XI. Art. XI, § 9(A). That simply means that would-be challengers cannot, for example, file a complaint in Richland County Common Pleas or the Ohio Court of Claims; they must instead come to this Court. It is not, however, an open-ended grant of authority for the Court to issue just any order or fashion just any remedy.

Section 9(D) establishes the Court's remedial powers and the critical limits on that power. Section 9(D)(1-2) states that the Court cannot implement a district plan that has not been approved by the Commission, nor can the Court order the Commission to adopt a particular district plan. And Section 9(D)(3) limits the types of defects that the Court can address and the remedies it can order: "If the supreme court of Ohio determines that a general assembly district plan adopted by the commission does not comply with the requirements of *Section 2, 3, 4, 5, or 7 of this article*, the available remedies shall be as follows:" (emphasis added) The Court can order the Commission to amend the Plan to correct "isolated violations" of "those requirements"—namely violations of Sections 2, 3, 4, 5, or 7. Art. XI, § 9(D)(3)(a). Alternatively, the Court can order the Commission to draw a new plan altogether if the Commission would have to amend six

or more House districts or two or more Senate districts "to correct violations of those requirements"—again, violations of Sections 2, 3, 4, 5, or 7. Art. XI, § 9(D)(3)(b).

The Court can consider Section 6 if—and only if—it is considering a plan adopted under the impasse procedure in Section 8. Even then, the Court may order the Commission to draw a new plan only if "the plan significantly violates those requirements"—that is, Sections 2, 3, 4, 5, or 7—"in a manner that materially affects the ability of the plan to contain districts whose voters favor political parties in an overall proportion that corresponds closely to the statewide political party preferences of the voters of Ohio, as described in division (B) of Section 6 of this article" and the statewide proportion of districts does not closely correspond to parties' statewide vote share in the prior 10 years of statewide elections. Art. XI, § 9(D)(3)(c).

At every step, the Court can order a remedy *only if* it first finds a violation of the requirements of Sections 2, 3, 4, 5, or 7. The central thread of Section 9 is the prefatory statement "If the supreme court of Ohio determines that a general assembly plan * * * does not comply with the requirements of Section 2, 3, 4, 5, or 7," followed by three subsections that turn on "violations of those requirements." None of the Objectors allege any violations of "those requirements" in their latest proposed objections. Nor did they allege any such violations in their original Complaints. And with no allegations that the Commission violated "those requirements," Art. XI, § 9(D)(3)(a), (b), and (c), this Court has no authority to entertain Objectors' requests. As the lead dissent observed in *League I*, "Conspicuously absent from this list of violations for which this court may invalidate a plan * * * is the failure to meet the directives set forth in Article XI, Section 6." *League I*, 167 Ohio St.3d 255, 2022-Ohio-65, at ¶ 189 (Kennedy, J., dissenting). And as the lead dissent observed in *League IV*, "This Court has no power to invalidate a plan simply because it violates Section 6." *League of Women Voters of*

Ohio v. Ohio Redistricting Comm., 168 Ohio St.3d 374, 2022-Ohio-1235, ¶ 101 ("*League IV*") (Kennedy, J., dissenting).

3. Objectors' challenges fail because they have no basis in the Complaints that were filed.

To invoke the original jurisdiction of this Court, a party must file a complaint that frames the issues for the lawsuit. S. Ct. Prac. R. 14.03(A). That fundamental principle is as true here as it is in ordinary civil litigation. Here, all three Complaints (filed in September 2021) focused on the divided, partisan vote for, and the partisanship of the plan adopted by, the Commission on September 16, 2021. *E.g.*, League of Women Voters Complaint, ¶1 ("Just after midnight on September 16, 2021, with a 5-2 vote along strictly partisan lines, Ohio's Redistricting Commission enacted maps that are intended to, and will, entrench a Republican veto-proof supermajority in both chambers of Ohio's General Assembly for the next four years"); Ohio Organizing Collaborative Complaint, ¶3 ("on September 16, 2021, just after midnight, the Ohio Redistricting Commission voted 5-2 on party lines to adopt a district plan that has the intent and effect of entrenching a veto-proof Republican supermajority in both chambers of the General Assembly for the next four years").

Directly contrary to those central allegations, a reconstituted Commission has now met and unanimously adopted the unified bipartisan plan that has been filed with this Court. The fact that the Commission adopted the plan with the support of both minority party members is crucial for a couple reasons. First, it changes the duration for which the Plan will be in effect. Instead of a four-year plan, the Plan will be in effect through the 2030 election. Second, the support of both minority-party members demonstrates that the anti-gerrymandering provision of Article XI, §8(B) functioned as designed so as to avoid the need to adopt a plan pursuant to the impasse provisions in Article XI, §8(C).

Because the proposed objections are completely untethered from the allegations of the Objectors' Complaints, the Court should deny the Motions for Leave.

4. This Court's prior decisions in these cases are non-final orders that can be modified at any point before final judgment.

Objectors argue that law of the case or stare decisis insulates the earlier orders in these cases from review or revision. They do not, because none of those orders amounted to a final judgment resolving all of the claims of the litigants and concluding the litigation. As such, they are all "subject to revision at any time before entry of judgment" concluding the litigation. Civil Rule 54(B) ("any order or other form of decision, however designated, which adjudicates fewer than all the claims or the rights and liabilities of fewer than all the parties, shall not terminate the action as to any of the claims or parties, and the order or other form of decision is subject to revision at any time before the entry of judgment adjudicating all the claims and the rights and liabilities of all the parties").[8]

That none of the prior orders of this Court in these cases "adjudicated all the claims and the rights and liabilities of all the parties" is clear from the terms of those orders. Each, *League I – V*, directed the Commission to adopt a new plan and kept the cases open for the purpose of reviewing the new plan. *Compare Neiman v. LaRose*, 169 Ohio St. 3d 565, 571, 2022-Ohio-2471, 207 N.E.3d 607, 613, ¶ 22, *cert. granted, judgment vacated sub nom. Huffman v. Neiman*, 143 S. Ct. 2687 (2023) *and Adams v. DeWine*, 2022-Ohio-871, 166 Ohio St. 3d 1431, 184 N.E.3d 111 ("This court entered final judgment in this case … and did not retain jurisdiction to

[8] By entries dated September 24, 2021, in *League of Women Voters*, 2021-Ohio-3377, and *Bennett*, 2021-Ohio-3391, and dated September 27, 2021, in *Ohio Organizing Collaborative*, 2021-Ohio-3415, this Court directed that "[t]he Ohio Rules of Civil Procedure shall supplement the Rules of Practice of the Supreme Court of Ohio for this case, unless clearly inapplicable." Rule 54 is clearly not inapplicable.

review any plan passed") *with, e.g., League I*, 167 Ohio St. 3d 255, 294, 2022-Ohio-65, ¶ 139 ("we retain jurisdiction for the purpose of reviewing the new plan adopted by the commission").

Moreover, for authority to retain jurisdiction and keep the cases open, the orders specifically cited the Ohio Constitution, Article IV, Section 2(B)(1)(f) ("The Supreme Court shall have original jurisdiction in * * * any cause on review as may be ***necessary to its complete determination***") (emphasis added) and *State v. Steffen*, 70 Ohio St.3d 399, 407, 639 N.E.2d 67 (1994), described as "interpreting Section 2(B)(1)(f) 'to authorize judgments in this court that are necessary ***to achieve closure and complete relief in actions pending*** before the court.'" *League I*, ¶ 136 (emphasis added). Because none of this Court's prior orders completely determined the issues or provided closure and complete relief, each is "subject to revision at any time" before entry of final judgment. Civil Rule 54(B).

Since the prior orders are not final, neither law of the case nor stare decisis applies here. *E.g., Hogg v. Grace Cmty. Church*, 202 N.E.3d 36, 39, 2022-Ohio-3516, ¶ 15 (12th Dist.) (law of the case did not apply to order granting motion for reconsideration because it was an interlocutory order that did not constitute a finding on the merits); *Denuit v. Ohio State Bd. of Pharmacy*, 994 N.E.2d 15, 22, 2013-Ohio-2484, ¶ 19 (4th Dist.) ("law of the case applies only to final orders and not to interlocutory orders") (quoting *Frazier v. Rodgers Builders*, 8th Dist. Cuyahoga No. 91987, 2010-Ohio-3058, ¶ 64); *Rates Tech. Inc. v. Broadvox Holding Co*., LLC, 15 F. Supp. 3d 307 (S.D.N.Y. 2014) (court not held to prior constructions of patent claims under stare decisis because they were interlocutory and decided prior to reexaminations).

As Rule 54(B) makes clear, a nonfinal interlocutory order may always be revised later. *Chapman v. Chapman*, 46 N.E.3d 1067, 1070, 2015-Ohio-4595, ¶ 10, fn. 7 (4th Dist.) ("the fact remains that the default judgment was interlocutory and subject to change at any time before

entry of a final judgment"). *See also Dunkle v. Children's Hosp. Med. Ctr. of Akron*, 5 N.E.3d 131, 139, 2013-Ohio-5555, ¶ 34 (9th Dist.) (order denying motion for summary judgment was interlocutory). And any order that can be revised at any point up to the entry of a final judgment has no precedential value, either as law of the case or stare decisis.

As a result, this Court has full authority to review and modify those decisions at any point prior to the entry of final judgment in these cases. *See, e.g., Corradi v. Gene Norris Honda, Inc.*, 106 Ohio App.3d 788, 791, 667 N.E.2d 416, 417 (11th Dist. 1995) ("If we determine that both the March 1 and March 3 judgments do not constitute final orders, then they are merely interlocutory orders subject to change, even if the change goes to the merits of the judgment").

Finally, this Court has rejected the application of stare decisis in a case involving, as these do, constitutional questions: "Stare decisis remains a controlling doctrine in cases presenting questions on the law of contracts, property, and torts, but it is ***not controlling in cases presenting a constitutional question***." (Emphasis added.) *State v. Bodyke*, 126 Ohio St. 3d 266, 275, 2010-Ohio-2424, 933 N.E.2d 753, 763, ¶ 37 (opinion by O'Connor, CJ).

For each of the reasons set forth above, Respondents request that this Court deny Objectors' Motions for Leave.

Respectfully submitted this the 16th day of October, 2023.

/s/ william stuart dornette

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Attorney General of Ohio

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CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of October, 2023, I have served the foregoing document by email:

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Yurij Rudensky (PHV 25422-2021)
Michael Li (PHV 25430-2021)
Ethan Herenstein (PHV 25429-2021)
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Counsel for Petitioners The Ohio Organizing Collaborative et al.

/s/william stuart dornette
W. Stuart Dornette

IN THE SUPREME COURT OF OHIO

League of Women Voters of Ohio, *et al.*, Petitioners, v. Ohio Redistricting Commission, *et al.*, Respondents.	Case No. 2021-1193
Bria Bennett, *et al.*, Petitioners, v. Ohio Redistricting Commission, *et al.*, Respondents.	Case No. 2021-1198
Ohio Organizing Collaborative, *et al.*, Petitioners, v. Ohio Redistricting Commission, *et al.*, Respondents.	Case No. 2021-1210

AFFIDAVIT OF MICHAEL BARBER

Now comes affiant Michael Barber, having first been duly cautioned and sworn, deposes and states as follows:

1. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of the statements and facts contained herein.
2. For the purposes of this litigation, I have been asked by counsel for Respondents McColley and LaRe to analyze relevant data and provide my expert opinions.
3. I am a tenured associate professor of political science and director of the Center for the Study of Elections and Democracy at Brigham Young University in Provo, Utah. I received my PhD in political science from Princeton University in 2014 with emphases in American politics and quantitative methods/statistical analyses. My dissertation was awarded the 2014 Carl Albert Award for best dissertation in American Politics by the American Political Science Association.
4. I teach several courses in American politics and quantitative research methods. These include classes about political representation, Congressional elections, statistical methods, and research design.
5. I have worked as an expert witness in several cases in which I have been asked to analyze and evaluate various political and elections-related data and statistical methods. Cases in which I have testified at trial or by deposition are listed in my CV, which is attached to the end of this report as Appendix A. I have previously provided expert reports in several cases related to voting, redistricting, and election-related issues: *Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants. Case*

No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida); Common Cause, et al., Plaintiffs, vs. Lewis, et al., Defendants. Case No. 18-CVS-14001 (Wake County, North Carolina); Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida); Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina); Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia); Georgia Coalition for the People's Agenda, Inc., et. al., Plaintiffs, v. Brad Raffensberger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia); Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE NO. 3:21-cv-00211-RAH- ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division); League of Women Voters of Ohio, et al., Relators, v. Ohio Redistricting Commission, et al., Respondents. Case No. 2021-1193 (Supreme Court of Ohio); Regina Adams, et al., Relators, v. Governor Mike DeWine, et al., Respondents. Case No. 2021-1428 (Supreme Court of Ohio); Rebecca Harper, et al., Plaintiffs, v. Representative Destin Hall, et al., Defendants (Consolidated Case). Case No. 21 CVS 500085 (Wake County, North Carolina); Carter, et al., Petitioners, v. Degraffenreid et al., Respondents (Consolidated Case). Case No. 464 M.D. 2021 (Commonwealth Court of Pennsylvania); Harkenrider, et al., Petitioners, v. Hochel et al., Respondents. Case No. E2022-0116CV (State of New York Supreme Court: County of Steuben); Our City Action Buffalo, Inc., et al., v. Common Council of the City of Buffalo (State of New York

Supreme Court: County of Erie); Citizens Project, et al., v. City of Colorado Springs, et al. Case No. 22-cv- 1365-CNS-MDB (U.S. District Court for the District of Colorado); Dr. Dorothy Nairne, et al., Plaintiffs, v. R. Yle Ardoin, Defendant, CIVIL NO. 3:22-cv-00178 (U.S. District Court for the Middle District of Louisiana).

6. I have reviewed three Ohio district plans (both House and Senate): The unified bipartisan plan adopted by the Commission on September 29, the "Rodden III Plan" and "Corrected Independent Map Drawers' Plan" referenced in paragraphs 5 and 6 of Dr. Rodden's affidavit filed in support of the Bennett petitioners' motion for leave to file objections.

7. I create a partisan index using statewide election results from 2016-2022.

8. To generate the partisan index, I used data from statewide elections in Ohio held between 2016 and 2022, which is consistent with data used in Dr. Rodden's affidavit (see paragraph 16 and Table 1 of Dr. Rodden's affidavit). The specific elections are: 2016 President, 2016 US Senate, 2018 US Senate, 2018 Governor, 2018 Attorney General, 2018 Auditor, 2018 Secretary of State, 2018 Treasurer, 2020 President, 2022 US Senate, 2022 Governor, 2022 Attorney General, 2022 Auditor, 2022 Secretary of State, 2022 Treasurer, 2022 Chief Justice, 2022 Justice 1/1/23, 2022 Justice 1/2/23.

9. I created the partisan index by adding up the total number of votes cast in each of the elections for the two major parties and taking the share of the two-party vote obtained by each party. This is the same approach used by the Commission and Dr. Rodden (see paragraph 19 of Dr. Rodden's affidavit). The analysis of the partisan index and partisan lean of each district was conducted using the software program R.

10. The 2016-2022 partisan lean of Ohio overall is 44.5% Democratic and 55.5% Republican.

11. I also calculate the partisan lean of the 88 counties in the state.

12. The 2016-2022 partisan lean of Ohio's six largest counties (Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit, considered together) is 58.6% Democratic and 41.4% Republican.

13. The 2016-2022 partisan lean of Ohio's other 82 counties considered together is 34.7% Democratic and 65.3% Republican.

14. Data from these statewide elections was then disaggregated to the 2020 US census block level and reaggregated to the different district boundaries in each plan. The block assignment files for each map were obtained from either the Commission's website or from the Bennett petitioners. I obtained the disaggregated election data from the Redistricting Data Hub.[1]

15. I then determine if each legislative district in each plan is Democratic or Republican leaning. I do this by looking at whether the partisan index in the district is greater than 50% in the Democratic direction. If it is, I assign this district as Democratic-leaning. If the partisan index is greater than 50% in the Republican direction, I label that district as Republican-leaning.

16. The 2016-2022 partisan lean of all 99 House districts in Ohio is:

Unified Bipartisan Plan	32 D-leaning	67 R-leaning
Rodden Plan	40 D-leaning	59 R-leaning
Corrected Independent Map Drawers Plan	40 D-leaning	59 R-leaning

17. The 2016-2022 partisan lean of the 42 House districts in Ohio's six largest counties (Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit) is:

Unified Bipartisan Plan	30 D-leaning	12 R-leaning

[1] https://redistrictingdatahub.org/state/ohio/

Rodden Plan	37 D-leaning	5 R-leaning
Corrected Independent Map Drawers Plan	36 D-leaning	6 R-leaning

18. The partisan lean of the 57 House district plan in Ohio's other 82 counties is:

Unified Bipartisan Plan	2 D-leaning	55 R-leaning
Rodden Plan	3 D-leaning	54 R-leaning
Corrected Independent Map Drawers Plan	4 D-leaning	53 R-leaning

19. The 2016-2022 partisan lean of all 33 Senate districts in Ohio is:

Unified Bipartisan Plan	9 D-leaning	24 R-leaning
Rodden Plan	12 D-leaning	21 R-leaning
Corrected Independent Map Drawers Plan	13 D-leaning	20 R-leaning

20. The partisan lean of the 17 Senate districts in Ohio's six largest counties is:

Unified Bipartisan Plan	9 D-leaning	8 R-leaning
Rodden Plan	12 D-leaning	5 R-leaning
Corrected Independent Map Drawers Plan	13 D-leaning	4 R-leaning

21. The partisan lean of the 16 Senate district plan in Ohio's other 82 counties:

Unified Bipartisan Plan	0 D-leaning	16 R-leaning
Rodden Plan	0 D-leaning	16 R-leaning
Corrected Independent Map Drawers Plan	0 D-leaning	16 R-leaning

FURTHER THE AFFIANT SAYETH NAUGHT.

Michael Barber

Sworn or affirmed before me and subscribed in my presence the 12 day of October, 2023, in the state of Utah and county of Utah.

Notary Public

VIRGINIA FAIRBANKS JOHNSON
Notary Public - State of Utah
Comm. No. 713009
My Commission Expires on
Jul 15, 2024

My Commission expires 7/15/2024

Appendix A:
Curriculum Vitae

Michael Jay Barber

CONTACT INFORMATION

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ACADEMIC APPOINTMENTS

Brigham Young University, Provo, UT

August 2020 - present Associate Professor, Department of Political Science
Jan 2023 - present Director, Center for the Study of Elections and Democracy
2014 - July 2020 Assistant Professor, Department of Political Science
2014 - Jan 2023 Faculty Scholar, Center for the Study of Elections and Democracy

EDUCATION

Princeton University Department of Politics, Princeton, NJ

Ph.D., Politics, July 2014

- Advisors: Brandice Canes-Wrone, Nolan McCarty, and Kosuke Imai
- Dissertation: "Buying Representation: the Incentives, Ideology, and Influence of Campaign Contributions on American Politics"
- 2015 Carl Albert Award for Best Dissertation, Legislative Studies Section, American Political Science Association (APSA)

M.A., Politics, December 2011

Brigham Young University, Provo, UT

B.A., International Relations - Political Economy Focus, April, 2008

- *Cum Laude*

RESEARCH INTERESTS

American politics, congressional polarization, political ideology, campaign finance, survey research

PUBLICATIONS

26. **"The Crucial Role of Race in 21st Century U.S. Political Realignment**, with Jeremy Pope
Forthcoming at *Public Opinion Quarterly*
25. **"Misclassification and Bias in Predictions of Individual Ethnicity from Administrative Records"**, with Lisa Argyle
Forthcoming at *American Political Science Review*
24. **"Partisanship and Trolleyology"**, with Ryan Davis
Forthcoming at *Research & Politics*
23. **"Does Issue Importance Attenuate Partisan Cue-Taking"**, with Jeremy Pope
Forthcoming at *Political Science Research and Methods*

22. **"A Revolution of Rights in American Founding Documents"**, with Scott Abramson and Jeremy Pope
Forthcoming at *Journal of Political Institutions and Political Economy*

21. **"Groups, Behaviors, and Issues as Cues of Partisan Attachments in the Public"**, with Jeremy Pope
Forthcoming at *American Politics Research*

20. **"Ideological Disagreement and Pre-emption in Municipal Policymaking"**, with Adam Dynes
American Journal of Political Science, no. 1 (2023): 119-136.

19. **"400 million voting records show profound racial and geographic disparities in voter turnout in the United States"**, with John Holbein
PloS One, 2022, Vol. 17, no. 6: e0268134

18. **"Comparing Campaign Finance and Vote Based Measures of Ideology"**
Journal of Politics, 2022. Vol. 84, no. 1 (2022): 613-619.

17. **"The Participatory and Partisan Impacts of Mandatory Vote-by-Mail"**, with John Holbein
Science Advances, 2020. Vol. 6, no. 35, DOI: 10.1126/sciadv.abc7685

16. **"Issue Politicization and Interest Group Campaign Contribution Strategies"**, with Mandi Eatough
Journal of Politics, 2020. Vol. 82: No. 3, pp. 1008-1025

15. **"Campaign Contributions and Donors' Policy Agreement with Presidential Candidates"**, with Brandice Canes-Wrone and Sharece Thrower
Presidential Studies Quarterly, 2019, 49 (4) 770–797

14. **"Conservatism in the Era of Trump"**, with Jeremy Pope
Perspectives on Politics, 2019, 17 (3) 719–736

13. **"Legislative Constraints on Executive Unilateralism in Separation of Powers Systems"**, with Alex Bolton and Sharece Thrower
Legislative Studies Quarterly, 2019, 44 (3) 515–548
Awarded the Jewell-Loewenberg Award for best article in the area of subnational politics published in *Legislative Studies Quarterly* in 2019

12. **"Electoral Competitiveness and Legislative Productivity"**, with Soren Schmidt
American Politics Research, 2019, 47 (4) 683–708

11. **"Does Party Trump Ideology? Disentangling Party and Ideology in America"**, with Jeremy Pope
American Political Science Review, 2019, 113 (1) 38–54

10. **"The Evolution of National Constitutions"**, with Scott Abramson
Quarterly Journal of Political Science, 2019, 14 (1) 89–114

9. **"Who is Ideological? Measuring Ideological Responses to Policy Questions in the American Public"**, with Jeremy Pope
The Forum: A Journal of Applied Research in Contemporary Politics, 2018, 16 (1) 97–122

8. **"Status Quo Bias in Ballot Wording"**, with David Gordon, Ryan Hill, and Joe Price
The Journal of Experimental Political Science, 2017, 4 (2) 151–160.

7. **"Ideologically Sophisticated Donors: Which Candidates Do Individual Contributors Finance?"**, with Brandice Canes-Wrone and Sharece Thrower
American Journal of Political Science, 2017, 61 (2) 271–288.

6. **"Gender Inequalities in Campaign Finance: A Regression Discontinuity Design"**, with Daniel Butler and Jessica Preece
Quarterly Journal of Political Science, 2016, Vol. 11, No. 2: 219–248.

5. **"Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate"**
   Public Opinion Quarterly, 2016, 80: 225–249.
4. **"Donation Motivations: Testing Theories of Access and Ideology"**
   Political Research Quarterly, 2016, 69 (1) 148–160.
3. **"Ideological Donors, Contribution Limits, and the Polarization of State Legislatures"**
   Journal of Politics, 2016, 78 (1) 296–310.
2. **"Online Polls and Registration Based Sampling: A New Method for Pre-Election Polling"** with Quin Monson, Kelly Patterson and Chris Mann.
   Political Analysis 2014, 22 (3) 321–335.
1. **"Causes and Consequences of Political Polarization"** In *Negotiating Agreement in Politics*. Jane Mansbridge and Cathie Jo Martin, eds., Washington, DC: American Political Science Association: 19–53. with Nolan McCarty. 2013.

   - Reprinted in *Solutions to Political Polarization in America*, Cambridge University Press. Nate Persily, eds. 2015
   - Reprinted in *Political Negotiation: A Handbook*, Brookings Institution Press. Jane Mansbridge and Cathie Jo Martin, eds. 2015

Available Working Papers

"Race and Realignment in American Politics"
with Jeremy Pope (Revise and Resumbit at *Public Opinion Quarterly*)

"The Policy Preferences of Donors and Voters"

"Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records."
with Kosuke Imai

"Super PAC Contributions in Congressional Elections"

Works in Progress

"Collaborative Study of Democracy and Politics"
with Brandice Canes-Wrone, Gregory Huber, and Joshua Clinton

"Preferences for Representational Styles in the American Public"
with Ryan Davis and Adam Dynes

Invited Presentations

"Are Mormons Breaking Up with Republicanism? The Unique Political Behavior of Mormons in the 2016 Presidential Election"

- Ivy League LDS Student Association Conference - Princeton University, November 2018, Princeton, NJ

"Issue Politicization and Access-Oriented Giving: A Theory of PAC Contribution Behavior"

- Vanderbilt University, May 2017, Nashville, TN

"Lost in Issue Space? Measuring Levels of Ideology in the American Public"

- Yale University, April 2016, New Haven, CT

"The Incentives, Ideology, and Influence of Campaign Donors in American Politics"

- University of Oklahoma, April 2016, Norman, OK

"Lost in Issue Space? Measuring Levels of Ideology in the American Public"

- University of Wisconsin - Madison, February 2016, Madison, WI

"Polarization and Campaign Contributors: Motivations, Ideology, and Policy"

- Hewlett Foundation Conference on Lobbying and Campaign Finance, October 2014, Palo Alto, CA

"Ideological Donors, Contribution Limits, and the Polarization of State Legislatures"

- Bipartisan Policy Center Meeting on Party Polarization and Campaign Finance, September 2014, Washington, DC

"Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate"

- Yale Center for the Study of American Politics Conference, May 2014, New Haven, CT

Conference Presentations

Washington D.C. Political Economy Conference (PECO):

- 2017 discussant

American Political Science Association (APSA) Annual Meeting:

- 2014 participant and discussant, 2015 participant, 2016 participant, 2017 participant, 2018 participant

Midwest Political Science Association (MPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2018 participant

Southern Political Science Association (SPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2017 participant

Teaching Experience

Poli 301: Data Visualization

- Summer 2022, Fall 2022

Poli 315: Congress and the Legislative Process

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017, Fall 2022

Poli 328: Quantitative Analysis

- Winter 2017, Fall 2017, Fall 2019, Winter 2020, Fall 2020, Winter 2021

Poli 410: Undergraduate Research Seminar in American Politics

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017

Awards and Grants

2019 BYU Mentored Environment Grant (MEG), American Ideology Project, $30,000

2017 BYU Political Science Teacher of the Year Award

2017 BYU Mentored Environment Grant (MEG), Funding American Democracy Project, $20,000

2016 BYU Political Science Department, Political Ideology and President Trump (with Jeremy Pope), $7,500

2016 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Hayden Galloway, Jennica Peterson, Rebecca Shuel

2015 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Michael-Sean Covey, Hayden Galloway, Sean Stephenson

2015 BYU Student Experiential Learning Grant, American Founding Comparative Constitutions Project (with Jeremy Pope), $9,000

2015 BYU Social Science College Research Grant, $5,000

2014 BYU Political Science Department, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), $3,000

2014 BYU Social Science College Award, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), $3,000

2014 BYU Center for the Study of Elections and Democracy, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), $2,000

2012 Princeton Center for the Study of Democratic Politics Dissertation Improvement Grant, $5,000

2011 Princeton Mamdouha S. Bobst Center for Peace and Justice Dissertation Research Grant, $5,000

2011 Princeton Political Economy Research Grant, $1,500

Other Scholarly Activities

Expert Witness in Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants. Case No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida)

Expert Witness in Common Cause, et al., Plaintiffs, vs. Lewis, et al., Defendants. Case No. 18-CVS-14001 (Wake County, North Carolina)

Expert Witness in Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida)

Expert Witness in Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina)

Expert Witness in Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia)

Expert Witness in Georgia Coalition for the People's Agenda, Inc., et. al., Plaintiffs, v. Brad Raffensberger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia)

Expert Witness in Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE No. 3:21-cv-00211-RAH-ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division)

Expert Witness in League of Women Voters of Ohio, et al., Relators, v. Ohio Redistricting Commission, et al., Respondents. Case No. 2021-1193 (Supreme Court of Ohio)

Expert Witness in Regina Adams, et al., Relators, v. Governor Mike DeWine, et al., Respondents. Case No. 2021-1428 (Supreme Court of Ohio)

Expert Witness in Rebecca Harper, et al., Plaintiffs, v. Representative Destin Hall, et al., Defendants (Consolidated Case). Case No. 21 CVS 500085 (Wake County, North Carolina)

Expert Witness in Carter, et al., Petitioners, v. Degraffenreid et al., Respondents (Consolidated Case). Case No. 464 M.D. 2021 (Commonwealth Court of Pennsylvania)

Expert Witness in Harkenrider, et al., Petitioners, v. Hochel et al., Respondents. Case No. E2022-0116CV (State of New York Supreme Court: County of Steuben)

Expert Witness in Our City Action Buffalo, Inc., et al., v. Common Council of the City of Buffalo (State of New York Supreme Court: County of Erie)

Expert Witness in Citizens Project, et al., v. City of Colorado Springs, et al. Case No. 22-cv-1365-CNS-MDB (U.S. District Court for the District of Colorado)

Expert Witness in Dr. Dorothy Nairne, et al., Plaintiffs, v. R. Yle Ardoin, Defendant, CIVIL NO. 3:22-cv-00178 (U.S. District Court for the Middle District of Louisiana)

Additional Training

EITM 2012 at Princeton University - Participant and Graduate Student Coordinator

Computer Skills

Statistical Programs: R, Stata, SPSS, parallel computing