

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GONIDAKIS, et al.,

Plaintiffs,

v.

FRANK LAROSE,

Defendant, and

**LEAGUE OF WOMEN VOTERS OF OHIO
and A. PHILIP RANDOLPH INSTITUTE
OF OHIO,**

Intervenor-Defendants.

Circuit Judge Amul R. Thapar

Chief Judge Algenon L. Marbley

Judge Benjamin J. Beaton

Case No. 2:22-cv-773

**DECLARATION OF FREDA J. LEVENSON IN SUPPORT OF
INTERVENOR-DEFENDANTS LEAGUE OF WOMEN VOTERS OF OHIO
AND A. PHILIP RANDOLPH INSTITUTE OF OHIO'S
SUBMISSION REGARDING THE ROLE OF THE FEDERAL COURT CONCERNING
THE OHIO GENERAL ASSEMBLY REDISTRICTING PLAN**

Declaration of Freda J. Levenson

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. I am one of the counsel for Intervenor-Defendants League of Women Voters of Ohio and A. Philip Randolph Institute of Ohio in the above-captioned case.
2. **Exhibit 1** is a true and correct copy of the visual representation of the Third Plan adopted by the Ohio Redistricting Commission (“the Commission”) on February 24, 2022, which is publicly available on the Commission’s website: <https://redistricting.ohio.gov/maps>.
3. **Exhibit 2** is a true and correct copy of the native files for the Third Plan adopted by the Commission on February 24, 2022, which are publicly available on the Commission’s website: <https://redistricting.ohio.gov/maps>. Exhibit 2 was filed manually with the Court and will be served on counsel of record for all parties. *See* ECF No 155.
4. **Exhibit 3** is a true and correct copy of the visual representation of the Fourth Plan adopted by the Commission on March 28, 2022, which is publicly available on the Commission’s website: <https://redistricting.ohio.gov/maps>.
5. **Exhibit 4** is a true and correct copy of the native files for the Fourth Plan adopted by the Commission on March 28, 2022, which are publicly available on the Commission’s website: <https://redistricting.ohio.gov/maps>. Exhibit 4 was filed manually with the Court and will be served on counsel of record for all parties. *See* ECF No 155.
6. **Exhibit 5** is a true and correct copy of the transcript of the March 28, 2022 Ohio Redistricting Commission Hearing, which is publicly available on the Commission’s website: <https://redistricting.ohio.gov/meetings>.
7. **Exhibit 6** is a true and correct copy of the Affidavit of Dr. Christopher Warshaw, as filed on April 1, 2022 in the Supreme Court of Ohio in *League of Women Voters of Ohio, et al. v. Ohio Redistricting Commission, et al.*, Case No. 2021-1193.
8. **Exhibit 7** is a true and correct copy of the visual representation of the March 28, 2022 plan drafted by independent map drawers Drs. Douglas Johnson and Michael McDonald (“Independent Plan”), which is publicly available on the Commission’s website: <https://redistricting.ohio.gov/maps>.
9. **Exhibit 8** is a true and correct copy of the native files for the March 28, 2022 plan drafted by independent map drawers Drs. Douglas Johnson and Michael McDonald

(“Independent Plan”), which are publicly available on the Commission’s website: <https://redistricting.ohio.gov/maps>. Exhibit 8 was filed manually with the Court and will be served on counsel of record for all parties. *See* ECF No 155.

10. **Exhibit 9** is a true and correct copy of the transcript of the March 21, 2022 Ohio Redistricting Commission Hearing, which is publicly available on the Commission’s website: <https://redistricting.ohio.gov/meetings>.
11. **Exhibit 10** is a true and correct copy of the Affidavit of Senator Vernon Sykes, as filed on April 4, 2022 in the Supreme Court of Ohio in *League of Women Voters of Ohio, et al. v. Ohio Redistricting Commission, et al.*, Case No. 2021-1193.
12. **Exhibit 11** is a true and correct copy of the Affidavit of Minority Leader Allison Russo, as filed on April 4, 2022 in the Supreme Court of Ohio in *League of Women Voters of Ohio, et al. v. Ohio Redistricting Commission, et al.*, Case No. 2021-1193.
13. **Exhibit 12** is a true and correct copy of the Affidavit of Christopher Glassburn, as filed on April 4, 2022 in the Supreme Court of Ohio in *League of Women Voters of Ohio, et al. v. Ohio Redistricting Commission, et al.*, Case No. 2021-1193.
14. **Exhibit 13** is a true and correct copy of the Affidavit of Dr. Jonathan Rodden, as filed on April 1, 2022 in the Supreme Court of Ohio in *Bria Bennett, et al. v. Ohio Redistricting Commission, et al.*, Case No. 2021-1198.
15. **Exhibit 14** is a true and correct copy of the Affidavit of Michael S. Latner, as filed on April 1, 2022 in the Supreme Court of Ohio in *The Ohio Organizing Collaborative, et al. v. Ohio Redistricting Commission, et al.*, Case No. 2021-1210.

I declare the above to be true under penalty of perjury of the laws of the United States of America.

Respectfully submitted,

/s/ Freda J. Levenson

Freda J. Levenson (0045916)

Counsel of Record

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CERTIFICATE OF SERVICE

I, Freda J. Levenson, hereby certify that on this 6th day of April, 2022, I electronically filed the foregoing with the Clerk of Court for the United States District Court for the Southern District of Ohio, Eastern Division via the ECF system, which will send notification of such filing to all counsel of record.

/s/ Freda J. Levenson
Freda J. Levenson (0045916)
Counsel for Intervenor-Defendants