

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,  
Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-0298

Case No. 2022-0303  
*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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PRESENTATION OF EVIDENCE BY RESPONDENTS HUFFMAN AND CUPP  
VOLUME II

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## PRESENTATION OF EVIDENCE BY RESPONDENTS HUFFMAN AND CUPP

### VOLUME II

Respondents, Speaker of the Ohio House of Representatives Robert Cupp, and Senate President Matthew Huffman, submit the following evidence in this matter<sup>1</sup>:

<b>Exhibit</b>	<b>Item Description</b>	<b>Page No.</b>
1	Transcript of Ohio Redistricting Commission Meeting dated February 23, 2022	HC001-HC024
2	Transcript of Ohio Redistricting Commission Meeting dated February 24, 2022	HC025-HC091
3	Transcript of Ohio Redistricting Commission Hearing dated March 1, 2022	HC092-HC143
4	Transcript of Ohio Redistricting Commission Meeting dated March 2, 2022	HC144-HC190
5	Attorney General Opinion to Speaker Cupp	HC191-HC205
6	Compactness Report for enacted March 2, 2022 Congressional Plan	HC206-HC209
7	Compactness Report for proposed Democratic Plan	HC210-HC213
8	Compactness Report for proposed Imai Plan	HC214-HC217
<b>Volume II</b>		
9	Speaker Cupp's Responses to LWVO Second Interrogatories	HC218-HC233
10	Speaker Cupp's Responses to LWVO Second Set of Requests for Production	HC234-HC248
11	Speaker Cupp's Responses to Neiman First Interrogatories	HC249-HC262
12	Speaker Cupp's Responses to Neiman First Set of Requests for Production	HC263-HC275
13	Senate President Huffman's Responses to LWVO Second Interrogatories	HC276-HC291
14	Senate President Huffman's Responses to LWVO Second Requests for Production	HC292-HC305
15	Senate President Huffman's to Neiman First Interrogatories	HC306-HC320
16	Senate President Huffman's to Neiman First Set of Requests for Production	HC321-HC332
17	Mr. Raymond DiRossi's Responses to Document Subpoena	HC333-HC343

<sup>1</sup> Respondents Huffman and Cupp also reserve the right to rely on any evidence presented in this matter by stipulation or presented by any party.

18	Mr. Blake Springhetti's Responses to Document Subpoena	HC344-HC354
19	SPRINGHETTI000003	HC355-HC356
20	SPRINGHETTI000053	HC357-HC358
21	SPRINGHETTI000058	HC359-HC360
<b>Volume III</b>		
22	Testimony of Dr. Kosuke Imai, Ph.D. <i>Graham et al v. Adams et al</i> Civil Action No. 22-00047, Commonwealth of Kentucky, Franklin Circuit Court, April 5, 2022.	HC361-HC556
23	Expert Report of Sean Trende	HC557-HC569

Respectfully submitted this the 25th day of April, 2022.

/s/ Phillip J. Strach

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**CERTIFICATE OF SERVICE**

The foregoing document was served on all counsel in this matter listed below on the 25<sup>th</sup> of April, 2022 via email

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# **Exhibit 9**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

**Petitioners,**

v.

Secretary of State Frank LaRose, *et al.*,

**Respondents.**

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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**SPEAKER CUPP’S RESPONSE TO LWVO PETITIONERS’  
SECOND SET OF INTERROGATORIES**

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Respondent Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serves his objections and responses to LWVO Petitioners’ Second Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Speaker Cupp makes the following answers, responses, and objections to LWVO Petitioners’ Second Set of Interrogatories (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by Speaker Cupp that would be likely to contain the information called for by the Requests. These

responses are subject to amendment and supplementation as Speaker Cupp acquires additional information. Speaker Cupp states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Speaker Cupp responds or objects to any Requests should not be taken as an admission that Speaker Cupp accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Speaker Cupp responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Speaker Cupp of any part of any objection to any Requests. Speaker Cupp will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Speaker Cupp has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Speaker Cupp also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Speaker Cupp is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Speaker Cupp to review records pertaining to all redistricting for his office going back decades.

Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Speaker Cupp has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan. Speaker Cupp further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Speaker Cupp to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Speaker Cupp further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Speaker Cupp also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Speaker Cupp lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **INTERROGATORIES**

### **INTERROGATORY NO. 2**

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Speaker Cupp objects that the terms “formally and informally” are vague and ambiguous. Speaker Cupp also objects to this Interrogatory the extent it seeks information not within the personal knowledge of Speaker Cupp. Subject to and without waiving the foregoing objections, Speaker Cupp states that the Congressional Plan adopted by the Commission on March 2, 2022 was primarily drawn by Mr. Blake Springhetti and Mr. Ray DiRossi. Speaker Cupp further states that negotiations and consultation with Democratic Mapdrawer Mr. Chris Glassburn also occurred, and that Mr. Springhetti and Mr. DiRossi were available to all members of the Commission. Speaker Cupp further identifies any employee of Ohio University that participated in creating the Common Unified Redistricting Database (otherwise known as the CURD).

### **INTERROGATORY NO. 3**

Describe the role played by any individuals identified in Interrogatory No. 2.

**ANSWER:** Speaker Cupp objects to this Interrogatory on the grounds that “formally and informally” and “role” is vague and ambiguous. Speaker Cupp further objects to the extent it seeks information not within the personal knowledge of Speaker Cupp. Speaker Cupp states that Mr. DiRossi and Mr. Springhetti assisted in drawing the congressional districts, with input from members of the Ohio Redistricting Commission, Mr. Christopher Glassburn, and public input.

#### **INTERROGATORY NO. 4**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that upon the failure of the General Assembly to pass a second Congressional Plan, the Commission began conducting hearings and working on a congressional district plan. The hearings and public testimony are available online on the Ohio Redistricting Commission website at <https://redistricting.ohio.gov/>. Ultimately, the Commission adopted a congressional district plan on March 2, 2022 in compliance with the Court's order in *Adams v. DeWine*, and in compliance with all other applicable state and federal laws.

#### **INTERROGATORY NO. 5**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Speaker Cupp objects to this Interrogatory because it seeks information not within the personal knowledge of Speaker Cupp. This request is properly directed to Senator Sykes and/or Leader Russo.

#### **INTERROGATORY NO. 6**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp does not recall when he first viewed the March 2 Plan, but refers Petitioners to documents produced contemporaneously showing email exchanges between Commission members and/or their staff regarding proposed congressional districting plans.

**INTERROGATORY NO. 7**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that individuals involved in the creation of the 2021 Congressional Plan were instructed to comply with applicable state and federal law including the requirements of the Ohio Constitution, and the Court's order in *Adams v. DeWine*.

**INTERROGATORY NO. 8**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp also objects to this Interrogatory to the extent that it seeks information beyond his personal knowledge. Speaker Cupp further objects to this Interrogatory to the extent it seeks a legal opinion or improper lay witness testimony. Subject to and without waiving these objections, Speaker Cupp states that the March 2 Congressional Plan was intentionally constructed to comply with the Court's order in *Adams v. DeWine*, and all applicable provisions of the Ohio Constitution.

### **INTERROGATORY NO. 9**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent that it seeks information outside of his personal knowledge. Speaker Cupp further objects on the ground that this Interrogatory is duplicative of Interrogatory No. 2. Subject to and without waiving these objections, Speaker Cupp states that he and the individuals identified in Interrogatory No. 2 are current State employees and that some, like Ray DiRossi and Blake Springhetti, received a temporary increase in their regular state salaries to account for the increased time and demand on performing their jobs during legislative and congressional redistricting.

### **INTERROGATORY NO. 10**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this Interrogatory is overly broad and unduly burdensome in that it is not limited to a relevant time frame, nor is it limited to relevant actors in this matter. Subject to and without waiving these objections, Speaker Cupp states that he communicated with Mr. Springhetti, members of his staff, Mr. DiRossi, Senate President Huffman, and members of the Ohio Redistricting Commission. Speaker Cupp further states that he discussed Congressional district plans at all Commission hearings identified in response to Interrogatory No. 13 and the members of the public that spoke at those hearings.

**INTERROGATORY NO. 11**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY NO. 12**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY NO. 13**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this Interrogatory is overly broad and unduly burdensome in that it seeks identification of any meeting, for an entire year, where congressional redistricting was discussed. As such, this request is not narrowly tailored in time or scope to Petitioners' Complaint. Subject to and without waiving these objections, Speaker Cupp identifies the Ohio Redistricting Commission Committee meetings on February 22, 2022; February 23, 2022; February 24, 2022; March 1, 2022; March 2, 2022.

#### **INTERROGATORY NO. 14**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Speaker Cupp objects on the ground that this Interrogatory is duplicative of Interrogatory No. 2. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to his response to Interrogatory No. 2.

#### **INTERROGATORY NO. 15**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that all applicable state and federal law was consulted and adhered to in the drafting of the March 2 Congressional Plan. Speaker Cupp further states that maps were drawn and submitted on the Ohio Redistricting Commission Website. Speaker Cupp further refers Petitioners to documents produced contemporaneously with this request.

**INTERROGATORY NO. 16**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to this Interrogatory on the ground that “public release” is vague, and undefined. Speaker Cupp further objects that this request calls for information outside of his knowledge. Subject to and without waiving these objections Speaker Cupp refers Petitioners to his response to Interrogatory No. 2, detailing the individuals involved in drafting the 2021 Congressional Plan.

This the 19th day of April, 2022.

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I hereby certify that on this the 19<sup>th</sup> day of April, 2022, I have served the foregoing document via email to:

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4866-7065-6796 v.1

# **Exhibit 10**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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**SPEAKER CUPP’S RESPONSES TO LWVO PETITIONERS’ SECOND SET OF  
REQUESTS FOR PRODUCTION**

Respondent Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serves his objections and responses to Petitioners’ Second Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

Speaker Cupp makes the following answers, responses, and objections to Petitioners’ Second Set of Requests for Production of Documents (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by Speaker Cupp that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Speaker Cupp acquires additional

information. Speaker Cupp states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Speaker Cupp responds or objects to any Requests should not be taken as an admission that Speaker Cupp accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Speaker Cupp responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Speaker Cupp of any part of any objection to any Requests. Speaker Cupp will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Speaker Cupp has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Speaker Cupp also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Speaker Cupp is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Speaker Cupp to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the

discovery of relevant admissible evidence. As such, in his responses, Speaker Cupp has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan.

Speaker Cupp further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Speaker Cupp to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Speaker Cupp further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Speaker Cupp also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Speaker Cupp lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

### **REQUEST NO. 3**

All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Speaker Cupp objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio General Assembly. Speaker Cupp further objects that this Request is overly broad and unduly burdensome in that it has no bearing on Petitioners' claims in this matter. The General Assembly did not pass a Congressional Plan and as a result, the Commission passed a Congressional Plan on March 2, 2022.

### **REQUEST NO. 4**

All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Speaker Cupp objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio Redistricting Commission. Speaker Cupp further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 5**

All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 6**

All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Speaker Cupp objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Speaker Cupp refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged documents being produced contemporaneously.

#### **REQUEST NO. 7**

All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Speaker Cupp objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio Redistricting Commission.

#### **REQUEST NO. 8**

All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that he considered compliance to mean complying with all applicable state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* when instructing mapdrawers and when determining to vote for the Congressional Plan adopted on March 2, 2022. Speaker Cupp further refers Petitioners to documents being produced contemporaneously.

#### **REQUEST NO. 9**

All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Request on the grounds that it is duplicative of Request Number 8. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to his responses and objections to Request Number 8.

### **REQUEST NO. 10**

All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 11**

Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Speaker Cupp refers Petitioners to documents produced contemporaneously with these requests and Speaker Cupp's response to Interrogatory No. 2.

### **REQUEST NO. 12**

All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Speaker Cupp objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this request is overly broad, unduly burdensome, and seeks information outside of Speaker Cupp's knowledge. The request seeks documents and information pertaining to meetings with any Ohio Redistricting Commission Members, regardless of whether Speaker Cupp was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Speaker Cupp can provide.

### **REQUEST NO. 13**

All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that mapdrawers were instructed to comply with all applicable state and federal laws, and the Court's opinion in *Adams v. DeWine*. Speaker Cupp further states that no racial data was considered in drawing the Congressional Plan at issue in this action. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

#### **REQUEST NO. 14**

All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Speaker Cupp objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this request seeks information beyond his knowledge as he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Speaker Cupp states that he does not possess any such documents or contracts other than those for redistricting software and supplies as previously produced in *Bennett v. ORC*, 2021-1198.

#### **REQUEST NO. 15**

All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Speaker Cupp objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

#### **REQUEST NO. 16**

All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Speaker Cupp objects to the extent this Request calls for information covered

by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Speaker Cupp also objects that this request is not relevant, as Speaker Cupp's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

#### **REQUEST NO. 17**

All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Speaker Cupp objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Speaker Cupp also objects that this request is not relevant, as even if Speaker Cupp had communications with these organizations, those communications would have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

#### **REQUEST NO. 18**

All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

#### **REQUEST NO. 19**

All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

**REQUEST NO. 20**

All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Speaker Cupp refers Petitioners to documents being produced contemporaneously.

**REQUEST NO. 21**

All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

**REQUEST NO. 22**

Any and all expert report(s) or expert affidavit(s) prepared by your Expert Witness(es) concerning (a) the March 2 Plan or (b) any expert report or expert affidavit drafted by Dr. Imai or Dr. Warshaw.

**ANSWER:** Speaker Cupp objects to this Requests on the grounds that it is premature. Subject to and without waiving these objections, Speaker Cupp states that if any expert reports are produced, they will be produced in accordance with the Court's existing deadlines.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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I hereby certify that on this 19th day of April, 2022, I have served the foregoing document by email:

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4881-5740-7260 v.1

# **Exhibit 11**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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SPEAKER CUPP’S RESPONSE TO NEIMAN PETITIONERS’  
FIRST SET OF INTERROGATORIES

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Respondent Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Speaker Cupp makes the following answers, responses, and objections to Petitioners’ First Set of Interrogatories (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by Speaker Cupp that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Speaker Cupp acquires additional

information. Speaker Cupp states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Speaker Cupp responds or objects to any Requests should not be taken as an admission that Speaker Cupp accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Speaker Cupp responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Speaker Cupp of any part of any objection to any Requests. Speaker Cupp will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Speaker Cupp has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Speaker Cupp also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Speaker Cupp is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Speaker Cupp to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the

discovery of relevant admissible evidence. As such, in his responses, Speaker Cupp has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan. Speaker Cupp further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Speaker Cupp to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Speaker Cupp further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Speaker Cupp also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Speaker Cupp lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## INTERROGATORIES

### INTERROGATORY #1

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

ANSWER: Speaker Cupp objects that the terms “formally and informally” are vague and ambiguous. Speaker Cupp also objects to the extent it seeks information not within the personal knowledge of Speaker Cupp. Subject to and without waiving the foregoing objections, Speaker Cupp states that the Congressional Plan adopted by the Commission on March 2, 2022 was primarily drawn by Mr. Blake Springhetti and Mr. Ray DiRossi. Speaker Cupp further states that negotiations and consultation with Democratic Mapdrawer Mr. Chris Glassburn also occurred, and that Mr. Springhetti and Mr. DiRossi were available to all members of the Commission. Speaker Cupp further identifies any employee of Ohio University that participated in creating the Common Unified Redistricting Database (otherwise known as the CURD).

### INTERROGATORY #2

Describe the role played by any individuals identified in Interrogatory No. 1.

ANSWER: Speaker Cupp objects to this Interrogatory on the grounds that “formally and informally” and “role” is vague and ambiguous. Speaker Cupp further objects to the extent it seeks information not within the personal knowledge of Speaker Cupp. Speaker Cupp states that Mr. DiRossi and Mr. Springhetti assisted in drawing the congressional districts, with input from members of the Ohio Redistricting Commission, Mr. Christopher Glassburn, and public input.

### **INTERROGATORY #3**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that upon the failure of the General Assembly to pass a second Congressional Plan, the Commission began conducting hearings and working on a congressional district plan. The hearings and public testimony are available online on the Ohio Redistricting Commission website at <https://redistricting.ohio.gov/>. Ultimately, the Commission adopted a congressional district plan on March 2, 2022 in compliance with the Court's order in *Adams v. DeWine*, and in compliance with all other applicable state and federal laws.

### **INTERROGATORY #4**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Speaker Cupp objects to this Interrogatory because it seeks information not within the personal knowledge of Speaker Cupp. This request is properly directed to Senator Sykes and/or Leader Russo.

### **INTERROGATORY #5**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp does not recall when he first viewed the March 2 Plan, but refers Petitioners to documents produced contemporaneously showing email exchanges between Commission members and/or their staff regarding proposed congressional districting plans.

**INTERROGATORY #6**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that individuals involved in the creation of the 2022 Congressional Plan were instructed to comply with applicable state and federal law including the requirements of the Ohio Constitution, and the Court's order in *Adams v. DeWine*.

**INTERROGATORY #7**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp also objects to this Interrogatory to the extent that it seeks information beyond his personal knowledge. Speaker Cupp further objects to this Interrogatory to the extent it seeks a legal opinion or improper lay witness testimony. Subject to and without waiving these objections, Speaker Cupp states that the March 2 Congressional Plan was intentionally constructed to comply with the Court's order in *Adams v. DeWine*, and all applicable provisions of the Ohio Constitution.

### **INTERROGATORY #8**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent that it seeks information outside of his personal knowledge. Speaker Cupp further objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Speaker Cupp states that he and the individuals identified in Interrogatory No. 1 are current State employees and that some, like Ray DiRossi and Blake Springhetti, received a temporary increase in their regular state salaries to account for the increased time and demand on performing their jobs during legislative and congressional redistricting.

### **INTERROGATORY #9**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this Interrogatory is overly broad and unduly burdensome in that it is not limited to a relevant time frame, nor is it limited to relevant actors in this matter. Subject to and without waiving these objections, Speaker Cupp states that he communicated with Mr. Springhetti, members of his staff, Mr. DiRossi, Senate President Huffman, and members of the Ohio Redistricting Commission. Speaker Cupp further states that he discussed Congressional district plans at all Commission hearings identified in response to Interrogatory No. 12 and the members of the public that spoke at those hearings.

**INTERROGATORY #10**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #11**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #12**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this Interrogatory is overly broad and unduly burdensome in that it seeks identification of any meeting, for an entire year, where congressional redistricting was discussed. As such, this request is not narrowly tailored in time or scope to Petitioners' Complaint. Subject to and without waiving these objections, Speaker Cupp identifies the Ohio Redistricting Commission Committee meetings on February 22, 2022; February 23, 2022; February 24, 2022; March 1, 2022; March 2, 2022.

### **INTERROGATORY #13**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Speaker Cupp objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to his response to Interrogatory No. 1.

### **INTERROGATORY #14**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that all applicable state and federal law was consulted and adhered to in the drafting of the March 2 Congressional Plan. Speaker Cupp further states that maps were drawn and submitted on the Ohio Redistricting Commission Website. Speaker Cupp further refers Petitioners to documents produced contemporaneously with this request.

**INTERROGATORY #15**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to this Interrogatory on the ground that “public release” is vague, and undefined. Speaker Cupp further objects that this request calls for information outside of his knowledge. Subject to and without waiving these objections Speaker Cupp refers Petitioners to his response to Interrogatory No. 1, detailing the individuals involved in drafting the 2022 Congressional Plan.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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*Counsel for Petitioners*

/s/ Phillip J. Strach

# **Exhibit 12**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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**SPEAKER CUPP’S RESPONSES TO NEIMAN PETITIONERS’  
FIRST SET OF REQUESTS FOR PRODUCTION**

Respondent Speaker Robert R. Cupp (“Speaker Cupp”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

Speaker Cupp makes the following answers, responses, and objections to Petitioners’ First Set of Requests for Production of Documents (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Speaker Cupp’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Speaker Cupp gained in their capacity as such, and (b) a review of the documents and materials maintained by Speaker Cupp that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Speaker Cupp acquires additional

information. Speaker Cupp states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Speaker Cupp responds or objects to any Requests should not be taken as an admission that Speaker Cupp accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Speaker Cupp responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Speaker Cupp of any part of any objection to any Requests. Speaker Cupp will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Speaker Cupp has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Speaker Cupp also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Speaker Cupp is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Speaker Cupp to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the

discovery of relevant admissible evidence. As such, in his responses, Speaker Cupp has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan.

Speaker Cupp further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Speaker Cupp to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Speaker Cupp further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Speaker Cupp also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Speaker Cupp lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## REQUEST FOR PRODUCTION OF DOCUMENTS

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Speaker Cupp objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio General Assembly. Speaker Cupp further objects that this Request is overly broad and unduly burdensome in that it has no bearing on Petitioners' claims in this matter. The General Assembly did not pass a Congressional Plan and as a result, the Commission passed a Congressional Plan on March 2, 2022.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Speaker Cupp objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio Redistricting Commission. Speaker Cupp further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Speaker Cupp objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Speaker Cupp refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged

documents being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Speaker Cupp objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects on the ground that this request seeks information outside of his knowledge. Speaker Cupp does not speak for the entire Ohio Redistricting Commission.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that he considered compliance to mean complying with all applicable state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* when instructing mapdrawers and when determining to vote for the Congressional Plan adopted on March 2, 2022. Speaker Cupp further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Speaker Cupp objects to this Request on the grounds that it is duplicative of Request number 6. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to his responses and objections to Request Number 6.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Speaker Cupp refers Petitioners to documents produced contemporaneously

with these requests and Speaker Cupp’s response to Interrogatory No. 1.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Speaker Cupp objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that this request is overly broad, unduly burdensome, and seeks information outside of Speaker Cupp’s knowledge. The request seeks documents and information pertaining to meetings with any Ohio Redistricting Commission Members, regardless of whether Speaker Cupp was present. The request also seeks documents considered by “any” member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Speaker Cupp can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Speaker Cupp states that mapdrawers were instructed to comply with all applicable state and federal laws, and the Court’s opinion in *Adams v. DeWine*. Speaker Cupp further states that no racial data was considered in drawing the Congressional Plan at issue in this action. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Speaker Cupp objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects

that this request seeks information beyond his knowledge as he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Speaker Cupp states that he does not possess any such documents or contracts other than those for redistricting software and supplies as previously produced in *Bennett v. ORC*, 2021-1198.

13. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Speaker Cupp objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

14. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Speaker Cupp objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Speaker Cupp also objects that this request is not relevant, as Speaker Cupp's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Speaker Cupp states that to the extent any responsive documents exist, they are being produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Speaker Cupp objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Speaker Cupp also objects that this request is not relevant, as even if Speaker Cupp had communications with these organizations, those communications would have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Speaker Cupp states that to the extent any responsive documents exist, they are being produced

contemporaneously.

16. All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Speaker Cupp refers Petitioners to documents being produced contemporaneously.

18. All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Speaker Cupp refers Petitioners to documents being produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Speaker Cupp objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Speaker Cupp further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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*Counsel for Petitioners*

/s/ Phillip J. Strach



4881-3165-0076 v.1

# **Exhibit 13**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

v.

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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**SENATE PRESIDENT HUFFMAN’S RESPONSE TO LWVO PETITIONERS’  
SECOND SET OF INTERROGATORIES**

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Respondent Senate President Matthew Huffman (“Senate President Huffman”), by and through undersigned counsel serves his objections and responses to LWVO Petitioners’ Second Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Senate President Huffman makes the following answers, responses, and objections to LWVO Petitioners’ Second Set of Interrogatories (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Senate President Huffman’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Senate President Huffman gained in their capacity as such, and (b) a review of the documents and materials maintained by Senate President Huffman that would be likely to contain the information

called for by the Requests. These responses are subject to amendment and supplementation as Senate President Huffman acquires additional information. Senate President Huffman states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Senate President Huffman responds or objects to any Requests should not be taken as an admission that Senate President Huffman accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Senate President Huffman responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Senate President Huffman of any part of any objection to any Requests. Senate President Huffman will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Senate President Huffman has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Senate President Huffman also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Senate President Huffman is sued in his official

capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Senate President Huffman to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Senate President Huffman has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan. Senate President Huffman further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Senate President Huffman to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Senate President Huffman further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Senate President Huffman also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Senate President Huffman lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **INTERROGATORIES**

### **INTERROGATORY NO. 2**

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Senate President Huffman objects that the terms “formally and informally” are vague and ambiguous. Senate President Huffman also objects to this Interrogatory to the extent it seeks information not within the personal knowledge of Senate President Huffman. Subject to and without waiving the foregoing objections, Senate President Huffman states that the Congressional Plan adopted by the Commission on March 2, 2022 was primarily drawn by Mr. Blake Springhetti and Mr. Ray DiRossi. Senate President Huffman further states that negotiations and consultation with Democratic Mapdrawer Mr. Chris Glassburn also occurred, and that Mr. Springhetti and Mr. DiRossi were available to all members of the Commission. Senate President Huffman further identifies any employee of Ohio University that participated in creating the Common Unified Redistricting Database (otherwise known as the CURD).

### **INTERROGATORY NO. 3**

Describe the role played by any individuals identified in Interrogatory No. 2.

**ANSWER:** Senate President Huffman objects to this Interrogatory on the grounds that “formally and informally” and “role” is vague and ambiguous. Senate President Huffman further objects to the extent it seeks information not within the personal knowledge of Senate President Huffman. Senate President Huffman states that Mr. DiRossi and Mr. Springhetti assisted in drawing the congressional districts, with input from members of the Ohio Redistricting Commission, Mr. Christopher Glassburn, and public input.

**INTERROGATORY NO. 4**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that upon the failure of the General Assembly to pass a second Congressional Plan, the Commission began conducting hearings and working on a congressional district plan. The hearings and public testimony are available online on the Ohio Redistricting Commission website at <https://redistricting.ohio.gov/>. Ultimately, the Commission adopted a congressional district plan on March 2, 2022 in compliance with the Court’s order in *Adams v. DeWine*, and in compliance with all other applicable state and federal laws.

**INTERROGATORY NO. 5**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Senate President Huffman objects to this Interrogatory because it seeks information not within the personal knowledge of Senate President Huffman. This request is properly directed to Senator Sykes and/or Leader Russo.

**INTERROGATORY NO. 6**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman does not recall when he first viewed the March 2 Plan, but refers Petitioners to documents produced contemporaneously showing email exchanges between Commission members and/or their staff regarding proposed congressional districting plans.

**INTERROGATORY NO. 7**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that individuals involved in the creation of the 2021 Congressional Plan were instructed to comply with applicable state and federal law including the requirements of the Ohio Constitution, and the Court's order in *Adams v. DeWine*.

**INTERROGATORY NO. 8**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman also objects to this Interrogatory to the extent that it seeks information beyond his personal knowledge. Senate President Huffman further objects to this Interrogatory to the extent it seeks a legal opinion or improper lay witness testimony. Subject to and without waiving these objections, Senate President Huffman states that the March 2 Congressional Plan was intentionally constructed to comply with the Court's order in *Adams v. DeWine*, and all applicable provisions of the Ohio Constitution.

**INTERROGATORY NO. 9**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent that it seeks information outside of his personal knowledge. Senate President Huffman further objects on the ground that this Interrogatory is duplicative of Interrogatory No. 2. Subject to and without waiving these objections, Senate President Huffman states that he and the individuals identified in Interrogatory No. 2 are current State employees and that some, like Ray DiRossi and Blake Springhetti, received a temporary increase in their regular state salaries to account for the increased time and demand on performing their jobs during legislative and congressional redistricting.

**INTERROGATORY NO. 10**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this Interrogatory is overly broad and unduly burdensome in that it is not limited to a relevant time frame, nor is it limited to relevant actors in this matter. Subject to and without waiving these objections, Senate President Huffman states that he communicated with Mr. Springhetti, members of his staff, Mr. DiRossi, Senate President Huffman, and members of the Ohio Redistricting Commission. Senate President Huffman further states that he discussed Congressional district plans at all Commission hearings identified in response to Interrogatory No. 13 and the members of the public that spoke at those hearings.

**INTERROGATORY NO. 11**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY NO. 12**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY NO. 13**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this Interrogatory is overly broad and unduly burdensome in that it seeks identification of any meeting, for an entire year, where congressional redistricting was discussed. As such, this request is not narrowly tailored in time or scope to Petitioners' Complaint. Subject to and without waiving these objections, Senate President Huffman identifies the Ohio Redistricting Commission Committee meetings on February 22, 2022; February 23, 2022; February 24, 2022; March 1, 2022; March 2, 2022.

#### **INTERROGATORY NO. 14**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Senate President Huffman objects on the ground that this Interrogatory is duplicative of Interrogatory No. 2. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to his response to Interrogatory No. 2.

#### **INTERROGATORY NO. 15**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that all applicable state and federal law was consulted and adhered to in the drafting of the March 2 Congressional Plan. Senate President Huffman further states that maps were drawn and submitted on the Ohio Redistricting Commission Website. Senate President Huffman further refers Petitioners to documents produced contemporaneously with this request.

**INTERROGATORY NO. 16**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:**Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to this Interrogatory on the ground that “public release” is vague, and undefined. Senate President Huffman further objects that this request calls for information outside of his knowledge. Subject to and without waiving these objections Senate President Huffman refers Petitioners to his response to Interrogatory No. 2, detailing the individuals involved in drafting the 2021 Congressional Plan.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document via email to:

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Phillip J. Strach

# **Exhibit 14**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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SENATE PRESIDENT HUFFMAN’S RESPONSES TO LWVO  
PETITIONERS’ SECOND SET OF REQUESTS FOR PRODUCTION

Respondent Senate President Matthew Huffman (“Senate President Huffman”), by and through undersigned counsel serves his objections and responses to Petitioners’ Second Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

Senate President Huffman makes the following answers, responses, and objections to Petitioners’ Second Set of Requests for Production of Documents (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Senate President Huffman’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Senate President Huffman gained in their capacity as such, and (b) a review of the documents and materials maintained by Senate President Huffman that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as

Senate President Huffman acquires additional information. Senate President Huffman states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Senate President Huffman responds or objects to any Requests should not be taken as an admission that Senate President Huffman accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Senate President Huffman responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Senate President Huffman of any part of any objection to any Requests. Senate President Huffman will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Senate President Huffman has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Senate President Huffman also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Senate President Huffman is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these

requests as written, call for Senate President Huffman to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Senate President Huffman has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan.

Senate President Huffman further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Senate President Huffman to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Senate President Huffman further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Senate President Huffman also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Senate President Huffman lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

### **REQUEST NO. 3**

All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Senate President Huffman objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio General Assembly. Senate President Huffman further objects that this Request is overly broad and unduly burdensome in that it has no bearing on Petitioners' claims in this matter. The General Assembly did not pass a Congressional Plan and as a result, the Commission passed a Congressional Plan on March 2, 2022.

### **REQUEST NO. 4**

All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Senate President Huffman objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio Redistricting Commission. Senate President Huffman further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 5**

All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 6**

All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Senate President Huffman objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Senate President Huffman refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged documents being produced contemporaneously.

#### **REQUEST NO. 7**

All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Senate President Huffman objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio Redistricting Commission.

#### **REQUEST NO. 8**

All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that he considered compliance to mean complying with all applicable state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* when instructing mapdrawers and when determining to vote for the Congressional Plan adopted on March 2, 2022. Senate President Huffman further refers Petitioners to documents being produced contemporaneously.

#### **REQUEST NO. 9**

All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Request on the grounds that it is duplicative of Request Number 8. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to his responses and objections to Request Number 8.

#### **REQUEST NO. 10**

All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 11**

Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Senate President Huffman refers Petitioners to documents produced contemporaneously with these requests and Senate President Huffman’s response to Interrogatory No. 2.

### **REQUEST NO. 12**

All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Senate President Huffman objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this request is overly broad, unduly burdensome, and seeks information outside of Senate President Huffman’s knowledge. The request seeks documents and information pertaining to meetings with any Ohio Redistricting Commission Members, regardless of whether Senate President Huffman was present. The request also seeks documents considered by “any” member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Senate President Huffman can provide.

### **REQUEST NO. 13**

All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and

without waiving these objections, Senate President Huffman states that mapdrawers were instructed to comply with all applicable state and federal laws, and the Court's opinion in *Adams v. DeWine*. Senate President Huffman further states that no racial data was considered in drawing the Congressional Plan at issue in this action. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

#### **REQUEST NO. 14**

All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Senate President Huffman objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this request seeks information beyond his knowledge as he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Senate President Huffman states that he does not possess any such documents or contracts other than those for redistricting software and supplies as previously produced in *Bennett v. ORC*, 2021-1198.

#### **REQUEST NO. 15**

All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Senate President Huffman objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

#### **REQUEST NO. 16**

All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Senate President Huffman objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Senate

President Huffman further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Senate President Huffman also objects that this request is not relevant, as Senate President Huffman's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

### **REQUEST NO. 17**

All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Senate President Huffman objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Senate President Huffman also objects that this request is not relevant, as even if Senate President Huffman had communications with these organizations, those communications would have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

### **REQUEST NO. 18**

All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 19**

All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the

March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 20**

All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Senate President Huffman refers Petitioners to documents being produced contemporaneously.

### **REQUEST NO. 21**

All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

### **REQUEST NO. 22**

Any and all expert report(s) or expert affidavit(s) prepared by your Expert Witness(es) concerning (a) the March 2 Plan or (b) any expert report or expert affidavit drafted by Dr. Imai or Dr. Warshaw.

**ANSWER:** Senate President Huffman objects to this Requests on the grounds that it is premature. Subject to and without waiving these objections, Senate President Huffman states that if any expert reports are produced, they will be produced in accordance with the Court's existing deadlines.

This the 19th day of April, 2022.

/s/ Phillip J. Strach  
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## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April, 2022, I have served the foregoing document by email:

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4857-2320-3868 v.1

# **Exhibit 15**

**IN THE SUPREME COURT OF OHIO**

**Meryl Neiman, *et al.*,**

**League of Women Voters of Ohio, *et al.*,**

**Petitioners,**

v.

**Secretary of State Frank LaRose, *et al.*,**

**Respondents.**

**Case No. 2022-298**

**Case No. 2022-303**

***Consolidated***

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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**SENATE PRESIDENT HUFFMAN’S RESPONSE TO NEIMAN PETITIONERS’  
FIRST SET OF INTERROGATORIES**

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Respondent Senate President Matthew Huffman (“Senate President Huffman”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

Senate President Huffman makes the following answers, responses, and objections to Petitioners’ First Set of Interrogatories (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Senate President Huffman’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Senate President Huffman gained in their capacity as such, and (b) a review of the documents and materials maintained by Senate President Huffman that would be likely to contain the information

called for by the Requests. These responses are subject to amendment and supplementation as Senate President Huffman acquires additional information. Senate President Huffman states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Senate President Huffman responds or objects to any Requests should not be taken as an admission that Senate President Huffman accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Senate President Huffman responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Senate President Huffman of any part of any objection to any Requests. Senate President Huffman will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Senate President Huffman has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Senate President Huffman also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Senate President Huffman is sued in his official

capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these requests as written, call for Senate President Huffman to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Senate President Huffman has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan. Senate President Huffman further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Senate President Huffman to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Senate President Huffman further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Senate President Huffman also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Senate President Huffman lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **INTERROGATORIES**

### **INTERROGATORY #1**

Identify all individuals involved both formally and informally in the drawing of the March 2 Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Senate President Huffman objects that the terms “formally and informally” are vague and ambiguous. Senate President Huffman also objects to the extent it seeks information not within the personal knowledge of Senate President Huffman. Subject to and without waiving the foregoing objections, Senate President Huffman states that the Congressional Plan adopted by the Commission on March 2, 2022 was primarily drawn by Mr. Blake Springhetti and Mr. Ray DiRossi. Senate President Huffman further states that negotiations and consultation with Democratic Mapdrawer Mr. Chris Glassburn also occurred, and that Mr. Springhetti and Mr. DiRossi were available to all members of the Commission. Senate President Huffman further identifies any employee of Ohio University that participated in creating the Common Unified Redistricting Database (otherwise known as the CURD).

### **INTERROGATORY #2**

Describe the role played by any individuals identified in Interrogatory No. 1.

**ANSWER:** Senate President Huffman objects to this Interrogatory on the grounds that “formally and informally” and “role” is vague and ambiguous. Senate President Huffman further objects to the extent it seeks information not within the personal knowledge of Senate President Huffman. Senate President Huffman states that Mr. DiRossi and Mr. Springhetti assisted in drawing the congressional districts, with input from members of the Ohio Redistricting Commission, Mr. Christopher Glassburn, and public input.

### **INTERROGATORY #3**

Identify the time period over which the March 2 Plan was created, drawn, or drafted.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that upon the failure of the General Assembly to pass a second Congressional Plan, the Commission began conducting hearings and working on a congressional district plan. The hearings and public testimony are available online on the Ohio Redistricting Commission website at <https://redistricting.ohio.gov/>. Ultimately, the Commission adopted a congressional district plan on March 2, 2022 in compliance with the Court’s order in *Adams v. DeWine*, and in compliance with all other applicable state and federal laws.

### **INTERROGATORY #4**

Identify the time at which the March 2 Plan was presented to Senator Vernon Sykes or his staff and/or to Leader Allison Russo or her staff.

**ANSWER:** Senate President Huffman objects to this Interrogatory because it seeks information not within the personal knowledge of Senate President Huffman. This request is properly directed to Senator Sykes and/or Leader Russo.

**INTERROGATORY #5**

Identify the time at which you first received or viewed the March 2 Plan, any visual representation of the March 2 Plan, or data regarding the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman does not recall when he first viewed the March 2 Plan, but refers Petitioners to documents produced contemporaneously showing email exchanges between Commission members and/or their staff regarding proposed congressional districting plans.

**INTERROGATORY #6**

Identify and describe all instructions provided to individuals who created, or were in any way involved in the creation of, any Proposed Plan, including, but not limited to members of the Commission, their staff, consultants, and advisors (both paid and unpaid).

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that individuals involved in the creation of the 2022 Congressional Plan were instructed to comply with applicable state and federal law including the requirements of the Ohio Constitution, and the Court's order in *Adams v. DeWine*.

**INTERROGATORY #7**

Identify and describe any and all attempts that were made by you and/or the General Assembly to comply with Section 1(C)(3)(a), Section 1(C)(3)(b), or Section 1(C)(3)(c), of Article XIX of the Ohio Constitution in creating any Proposed Plan that you, or any member of the Commission or their representative, introduced to the Commission, including, but not limited to, the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman also objects to this Interrogatory to the extent that it seeks information beyond his personal knowledge. Senate President Huffman further objects to this Interrogatory to the extent it seeks a legal opinion or improper lay witness testimony. Subject to and without waiving these objections, Senate President Huffman states that the March 2 Congressional Plan was intentionally constructed to comply with the Court's order in *Adams v. DeWine*, and all applicable provisions of the Ohio Constitution.

### **INTERROGATORY #8**

Identify and describe any persons who received compensation for services rendered in the creation of any Ohio Congressional map that the General Assembly or Commission considered and/or adopted in 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent that it seeks information outside of his personal knowledge. Senate President Huffman further objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Senate President Huffman states that he and the individuals identified in Interrogatory No. 1 are current State employees and that some, like Ray DiRossi and Blake Springhetti, received a temporary increase in their regular state salaries to account for the increased time and demand on performing their jobs during legislative and congressional redistricting.

### **INTERROGATORY #9**

Identify all individuals with whom you communicated about Congressional district plans introduced or passed during 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this Interrogatory is overly broad and unduly burdensome in that it is not limited to a relevant time frame, nor is it limited to relevant actors in this matter. Subject to and without waiving these objections, Senate President Huffman states that he communicated with Mr. Springhetti, members of his staff, Mr. DiRossi, Speaker Cupp, and members of the Ohio Redistricting Commission. Senate President Huffman further states that he discussed Congressional district plans at all Commission hearings identified in response to Interrogatory No. 12 and the members of the public that spoke at those hearings.

**INTERROGATORY #10**

Identify all data and information about potential or actual Ohio Congressional districts to which the map drawer(s) had access during the process of drawing any Proposed Plan, including but not limited to data or information showing partisan performance, incumbent addresses, and racial demographics.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #11**

Identify all data filters, displays, or reports that the map drawer(s) viewed or otherwise reviewed or considered while drawing any Proposed Plan, including but not limited to partisan performance indices, voting age population by race, and incumbent addresses.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman directs Petitioners to the shapefiles and other data to be produced.

### **INTERROGATORY #12**

Identify and describe all dates, times, places, and attendees of any meeting at which you discussed Congressional redistricting in 2022.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this Interrogatory is overly broad and unduly burdensome in that it seeks identification of any meeting, for an entire year, where congressional redistricting was discussed. As such, this request is not narrowly tailored in time or scope to Petitioners' Complaint. Subject to and without waiving these objections, Senate President Huffman identifies the Ohio Redistricting Commission Committee meetings on February 22, 2022; February 23, 2022; February 24, 2022; March 1, 2022; March 2, 2022.

### **INTERROGATORY #13**

Identify all persons who drafted or created, or were in any way involved in the drafting or creation of the Proposed Plans and, for each identified person, the date or dates on which he or she drafted it.

**ANSWER:** Senate President Huffman objects on the ground that this Interrogatory is duplicative of Interrogatory No. 1. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to his response to Interrogatory No. 1.

### **INTERROGATORY #14**

Identify all persons who submitted maps, data, information, requests, or input that you used to draft the Proposed Plans, incorporated into the Proposed Plans, or caused to be included or incorporated into part or all of the Proposed Plans.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that all applicable state and federal law was consulted and adhered to in the drafting of the March 2 Congressional Plan. Senate President Huffman further states that maps were drawn and submitted on the Ohio Redistricting Commission Website. Senate President Huffman further refers Petitioners to documents produced contemporaneously with this request.

## **INTERROGATORY #15**

Identify all persons who, prior to the public release of each Proposed Plan, evaluated, reviewed, analyzed, were shown, or commented on the Proposed Plan or on maps, data, or plans that you used to draft the Proposed Plan, incorporated into the Proposed Plan, or adopted as part or all of the Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Interrogatory to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to this Interrogatory on the ground that “public release” is vague, and undefined. Senate President Huffman further objects that this request calls for information outside of his knowledge. Subject to and without waiving these objections Senate President Huffman refers Petitioners to his response to Interrogatory No. 1, detailing the individuals involved in drafting the 2022 Congressional Plan.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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# **Exhibit 16**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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SENATE PRESIDENT HUFFMAN’S RESPONSES TO NEIMAN  
PETITIONERS’ FIRST SET OF REQUESTS FOR PRODUCTION

Respondent Senate President Matthew Huffman (“Senate President Huffman”), by and through undersigned counsel serves his objections and responses to Petitioners’ First Set of Requests for Production of Documents as follows:

**GENERAL OBJECTIONS**

Senate President Huffman makes the following answers, responses, and objections to Petitioners’ First Set of Requests for Production of Documents (“Requests”). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Senate President Huffman’s present knowledge, information, and belief, as derived from: (a) the knowledge and information of present employees or agents of Senate President Huffman gained in their capacity as such, and (b) a review of the documents and materials maintained by Senate President Huffman that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as

Senate President Huffman acquires additional information. Senate President Huffman states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Senate President Huffman responds or objects to any Requests should not be taken as an admission that Senate President Huffman accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Senate President Huffman responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Senate President Huffman of any part of any objection to any Requests. Senate President Huffman will respond to Petitioners requests in accordance with Rules 26, 33, and 34 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Senate President Huffman has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Senate President Huffman also objects that none of these Requests are limited to the relevant time frame in this action. Particularly, as Senate President Huffman is sued in his official capacity as Speaker of the Ohio House and a member of the Ohio Redistricting Commission, these

requests as written, call for Senate President Huffman to review records pertaining to all redistricting for his office going back decades. Because of this, all requests, as written, are unduly burdensome, and unlikely to lead to the discovery of relevant admissible evidence. As such, in his responses, Senate President Huffman has interpreted these Requests to only seek information pertaining to the Ohio Redistricting Commission's process of enacting the March 2, 2022 congressional plan.

Senate President Huffman further objects that these requests seek "all communications" about broad topics without limitation for custodians. As written, these requests would require Senate President Huffman to search communications between him and anyone he has ever spoken to regardless of their relation to redistricting. Such requests are clearly overbroad and unduly burdensome.

Senate President Huffman further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Senate President Huffman also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Senate President Huffman lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Senate President Huffman objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio General Assembly. Senate President Huffman further objects that this Request is overly broad and unduly burdensome in that it has no bearing on Petitioners' claims in this matter. The General Assembly did not pass a Congressional Plan and as a result, the Commission passed a Congressional Plan on March 2, 2022.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Senate President Huffman objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio Redistricting Commission. Senate President Huffman further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the drawing of Congressional districts in 2022, including but not limited to communications between and/or among your employees, staff, officers, agents, or representatives.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Senate President Huffman objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Senate President Huffman refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged documents being produced contemporaneously.

5. All documents and communications concerning the Commission’s analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Senate President Huffman objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects on the ground that this request seeks information outside of his knowledge. Senate President Huffman does not speak for the entire Ohio Redistricting Commission.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that he considered compliance to mean complying with all applicable state and federal laws, and the Ohio Supreme Court’s Opinion in *Adams v. DeWine* when instructing mapdrawers and when determining to vote for the Congressional Plan adopted on March 2, 2022. Senate President Huffman further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Senate President Huffman objects to this Request on the grounds that it is duplicative of Request number 6. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to his responses and objections to Request Number 6.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Senate President Huffman refers Petitioners to documents produced

contemporaneously with these requests and Senate President Huffman's response to Interrogatory No. 1.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission (or representatives thereof).

**ANSWER:** Senate President Huffman objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this request is overly broad, unduly burdensome, and seeks information outside of Senate President Huffman's knowledge. The request seeks documents and information pertaining to meetings with any Ohio Redistricting Commission Members, regardless of whether Senate President Huffman was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Senate President Huffman can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio in 2022, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Senate President Huffman states that mapdrawers were instructed to comply with all applicable state and federal laws, and the Court's opinion in *Adams v. DeWine*. Senate President Huffman further states that no racial data was considered in drawing the Congressional Plan at issue in this action. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Senate President Huffman objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that this request seeks information beyond his knowledge as he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Senate President Huffman states that he does not possess any such documents or contracts other than those for redistricting software and supplies as previously produced in *Bennett v. ORC*, 2021-1198.

13. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Senate President Huffman objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

14. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Senate President Huffman objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Senate President Huffman also objects that this request is not relevant, as Senate President Huffman's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Senate President Huffman objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Senate President

Huffman also objects that this request is not relevant, as even if Senate President Huffman had communications with these organizations, those communications would have no bearing on whether or not the March 2 Congressional Plan violates the Ohio Constitution. Subject to and without waiving these objections, Senate President Huffman states that to the extent any responsive documents exist, they are being produced contemporaneously.

16. All documents relating to analysis conducted by you, any other member of the Ohio General Assembly or their staff, the Ohio General Assembly or its staff, the Ohio Redistricting Commission or its staff, or a member of the Ohio Redistricting Commission or their staff; regarding whether any Proposed Plan complied with the Ohio Constitution, including but not limited to Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in any Proposed Plan, including the March 2 Plan.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Senate President Huffman refers Petitioners to documents being produced contemporaneously.

18. All documents and communications discussed in, relied on, or relating to any of your responses to an interrogatory served on you by a party in this suit.

**ANSWER:** Senate President Huffman refers Petitioners to documents being produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Senate President Huffman objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Senate President Huffman further objects that any communications or documents that merely

reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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*Counsel for Petitioners*

/s/ Phillip J. Strach

4865-1087-9772 v.1

# **Exhibit 17**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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RAYMOND DIROSSI'S OBJECTIONS AND RESPONSES  
TO SUBPOENA DUCES TECUM

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Raymond DiRossi ("Mr. DiRossi"), by and through undersigned counsel serves his objections and responses to Petitioners' Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

Mr. DiRossi makes the following answers, responses, and objections to Petitioners' Subpoena Duces Tecum ("Requests"). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Mr. DiRossi's present knowledge, information, and belief, as derived from: a review of the documents and materials maintained by Mr. DiRossi that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Mr. DiRossi acquires additional information. Mr. DiRossi states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the course of this

litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Mr. DiRossi responds or objects to any Requests should not be taken as an admission that Mr. DiRossi accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Mr. DiRossi responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Mr. DiRossi of any part of any objection to any Requests. Mr. DiRossi will respond to Petitioners requests in accordance with Rules 26 and 45 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Mr. DiRossi has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Mr. DiRossi also objects that none of these Requests are limited to the relevant time frame in this action.

Mr. DiRossi further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Mr. DiRossi also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the

requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Mr. DiRossi lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## REQUEST FOR PRODUCTION OF DOCUMENTS

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Mr. DiRossi objects on the ground that this request seeks information outside of his knowledge. Mr. DiRossi is not a legislator, and does not speak for the entire Ohio General Assembly. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents being produced contemporaneously.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Mr. DiRossi objects on the ground that this request seeks information outside of his knowledge. Mr. DiRossi is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. DiRossi further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the Ohio Redistricting Commission's Hearings during the Congressional redistricting process.

**ANSWER:** Mr. DiRossi objects on the ground that this request seeks information outside of his knowledge. Mr. DiRossi is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. DiRossi further objects that information regarding the hearings is publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Mr. DiRossi objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Mr. DiRossi refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Mr. DiRossi is not a member of the Ohio Redistricting Commission, and he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents being produced contemporaneously.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi states that he considered compliance to mean complying with all state and federal laws, and the Ohio Supreme Court’s Opinion in *Adams v. DeWine* as instructed by Speaker Cupp. Mr. DiRossi further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi states that mapdrawers were instructed to comply with all state and federal laws. Mr. DiRossi further refers Petitioners to documents being produced contemporaneously.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Mr. DiRossi refers Petitioners to documents to being produced contemporaneously.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission

(or representatives thereof).

**ANSWER:** Mr. DiRossi objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects that this request is overly broad, unduly burdensome, and seeks information outside of Mr. DiRossi's knowledge. The request seeks documents and information pertaining to meetings with any Commission members, regardless of whether Mr. DiRossi was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Mr. DiRossi can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. DiRossi states that mapdrawers were instructed to comply with all state and federal laws, and the Court's opinion in *Adams v. DeWine*. Mr. DiRossi further states that no racial data was considered in drawing the Congressional Plan adopted by the Commission on March 2, 2022. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects that this request seeks information beyond his knowledge as he does not speak for the entire Commission or the entire General Assembly. Subject to and without waiving these objections, Mr. DiRossi refers to documents or contracts previously produced in *Bennett v. ORC*, 2021-1198, and produced contemporaneously.

13. All communications with the Ohio Legislative Service Commission or any of its staff or directors relating to drawing any Proposed Plan.

**ANSWER:** Mr. DiRossi objects to the extent this request seeks information covered by the legislative privilege or R.C. 101.30. Mr. DiRossi further objects that this Request is unduly broad and overly burdensome given that the Ohio Legislative Service Commission

had nothing to do with the drafting of the Congressional Plan challenged in this action, which was passed by the Commission, not the General Assembly.

14. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Mr. DiRossi objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Mr. DiRossi objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. DiRossi also objects that this request is not relevant, as Mr. DiRossi's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

16. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Mr. DiRossi objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. DiRossi also objects that this request is not relevant, as, even if Mr. DiRossi had communications with these organizations, those communications have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in the 2021 Congressional Plan.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

18. All documents and communications related to the Section 1(C)(3)(d) statement.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. DiRossi refers Petitioners to documents produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Mr. DiRossi objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. DiRossi further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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*Counsel for Mr. DiRossi*

## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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*Counsel for Petitioners*

/s/ Phillip J. Strach

# **Exhibit 18**

IN THE SUPREME COURT OF OHIO

Meryl Neiman, *et al.*,

League of Women Voters of Ohio, *et al.*,

Petitioners,

v.

Secretary of State Frank LaRose, *et al.*,

Respondents.

Case No. 2022-298

Case No. 2022-303

*Consolidated*

Original Action Filed Pursuant to Ohio  
Constitution, Article XIX, Section 3(A)

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BLAKE SPRINGHETTI'S OBJECTIONS AND RESPONSES  
TO SUBPOENA DUCES TECUM

---

Blake Springhetti ("Mr. Springhetti"), by and through undersigned counsel serves his objections and responses to Petitioners' Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

Mr. Springhetti makes the following answers, responses, and objections to Petitioners' Subpoena Duces Tecum ("Requests"). Each of the following responses is made subject to any and all objections as to competence, relevance, or other grounds that would require exclusion of such statement if made by a witness present and testifying in court. Any and all such objections and grounds are expressly reserved.

The responses are based on Mr. Springhetti's present knowledge, information, and belief, as derived from: a review of the documents and materials maintained by Mr. Springhetti that would be likely to contain the information called for by the Requests. These responses are subject to amendment and supplementation as Mr. Springhetti acquires additional information. Mr. Springhetti states that his responses to the Requests were prepared in consultation with his attorneys and may not exactly match the words or phrases that may be used by individuals in the

course of this litigation to describe events, policies, and practices discussed herein.

No incidental or implied admissions are intended by these responses. The fact that Mr. Springhetti responds or objects to any Requests should not be taken as an admission that Mr. Springhetti accepts or admits the existence of any facts assumed by such Requests or that such Response or objection constitutes admissible evidence as to any such assumed facts. The fact that Mr. Springhetti responds to part of or all of any Requests is not intended to be, and shall not be construed as a waiver by Mr. Springhetti of any part of any objection to any Requests. Mr. Springhetti will respond to Petitioners requests in accordance with Rules 26 and 45 of the Ohio Rules of Civil Procedure and will not provide responses or documents to the extent such responses or production would exceed the requirements of those Rules.

Since the Ohio Rules of Civil Procedure prohibit discovery of privileged matters, Mr. Springhetti has interpreted each Request to call for discoverable matter only. To the extent any response or produced document contains or refers to matters otherwise protected from discovery by the work product doctrine, the attorney-client privilege, or the legislative privilege, no waiver is intended, nor is any waiver intended as to any other matters that are or may be subject to such protection or otherwise privileged.

Mr. Springhetti also objects that none of these Requests are limited to the relevant time frame in this action.

Mr. Springhetti further objects to providing documents with .TIFF imaging or other similar methods, and accompanying metadata. With such a short time for discovery, this request is neither practical, nor is the cost an economically appropriate burden for the taxpayers of Ohio.

Mr. Springhetti also objects on the grounds that the time frame allowed for his response was insufficient to conduct the burdensome document search requested by Petitioners given the

requests are overly broad, request information that is entirely irrelevant, and are not reasonably limited in either time or scope.

These responses are provided solely for the purpose of and in relation to this action.

While Mr. Springhetti lodges numerous objections as to legislative privilege, and does not waive these objections, no documents have been withheld on the basis of legislative privilege.

## REQUEST FOR PRODUCTION OF DOCUMENTS

1. All documents and communications concerning the General Assembly's decision not to consider or vote on any Congressional maps in 2022.

**ANSWER:** Mr. Springhetti objects on the ground that this request seeks information outside of his knowledge. Mr. Springhetti is not a legislator, and does not speak for the entire Ohio General Assembly. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

2. All documents and communications concerning the Ohio Redistricting Commission's hearings during the Congressional redistricting process in 2022.

**ANSWER:** Mr. Springhetti objects on the ground that this request seeks information outside of his knowledge. Mr. Springhetti is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. Springhetti further objects that information regarding the hearings is largely publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

3. All documents and communications concerning the Ohio Redistricting Commission's Hearings during the Congressional redistricting process.

**ANSWER:** Mr. Springhetti objects on the ground that this request seeks information outside of his knowledge. Mr. Springhetti is not a Commission member, and does not speak for the entire Ohio Redistricting Commission. Mr. Springhetti further objects that information regarding the hearings is publicly available on the Ohio Redistricting Commission's Website found at <https://redistricting.ohio.gov/>.

4. All documents and communications concerning the Ohio Supreme Court's January 14, 2022 order and memorandum opinion invalidating the Ohio Congressional district plan adopted by the General Assembly in 2021, including any documents or communications concerning that order and memorandum opinion's applicability to congressional maps passed by the Ohio Redistricting Commission in 2022.

**ANSWER:** Mr. Springhetti objects to this Request because it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving this request, Mr. Springhetti refers Petitioners to comments made during the Ohio Redistricting Commission hearings regarding the Court order, and any non-privileged being produced contemporaneously.

5. All documents and communications concerning the Commission's analysis of Article XIX, Section 1(C)(3)(a) and Section 1(C)(3)(b) of the Ohio Constitution or its applicability to congressional maps passed by the Ohio Redistricting Commission.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Mr. Springhetti is not a member of the Ohio Redistricting Commission, and he does not speak for the entire Ohio Redistricting Commission. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

6. All documents and communications concerning any factors you considered in the creation, consideration, and/or passage of any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti states that he considered compliance to mean complying with all state and federal laws, and the Ohio Supreme Court's Opinion in *Adams v. DeWine* as instructed by Speaker Cupp. Mr. Springhetti further refers Petitioners to documents being produced contemporaneously.

7. All documents and communications concerning any instructions you received or provided regarding the creation of any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti states that mapdrawers were instructed to comply with all state and federal laws. Mr. Springhetti further refers Petitioners to documents being produced contemporaneously.

8. All documents and communications concerning any Proposed Plan, including (as specified in the definition above) any drafts thereof.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

9. Documents sufficient to establish all persons who assisted you in the creation of any Proposed Plan.

**ANSWER:** Mr. Springhetti refers Petitioners to documents being produced contemporaneously.

10. All documents relating to meetings—both formal and informal—of any Commission members related to the drawing of Congressional maps, including, without limitation, testimony, meeting minutes, data sets, maps, notes, and plans submitted to, created by, or otherwise considered by you, any member of the Commission or their staff; minutes, agendas, or presentations from Commission hearings or meetings; and any related communications, including, but not limited to, those with any member of the Commission

(or representatives thereof).

**ANSWER:** Mr. Springhetti objects to this request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects that this request is overly broad, unduly burdensome, and seeks information outside of Mr. Springhetti's knowledge. The request seeks documents and information pertaining to meetings with any Commission members, regardless of whether Mr. Springhetti was present. The request also seeks documents considered by "any" member of the Commission or their staff. Such a request is clearly out of proportion with Petitioners needs in this case, and beyond what Mr. Springhetti can provide.

11. All documents relating to information that was used to draw Congressional district maps for Ohio, including, without limitation, and produced in native format: shapefiles; all files or data sets used in Maptitude or other mapping software; and files pertaining to precinct names, precinct lines, partisan indexes or other partisan data, racial data, election results, population shifts, voter registration, voter affiliation, or changing census block lines for the 2018 election, 2020 election, and current redistricting cycle.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Subject to and without waiving these objections, Mr. Springhetti states that mapdrawers were instructed to comply with all state and federal laws, and the Court's opinion in *Adams v. DeWine*. Mr. Springhetti further states that no racial data was considered in drawing the Congressional Plan adopted by the Commission on March 2, 2022. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

12. All documents including, without limitation, requests for proposals, proposals, contracts, communications, and timesheets or invoices, relating to consultants, firms, vendors, or other third parties, including, without limitation, John Morgan, Christopher Glassburn, Clark Bensen, relating to consultants, firms, vendors, or other third parties consulted, involved in, or communicated with by you, any member of the General Assembly or its staff, any member of the Ohio Redistricting Commission or their staff, or the Ohio Redistricting Commission or its staff, relating to any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects that this request seeks information beyond his knowledge as he does not speak for the entire Commission or the entire General Assembly. Subject to and without waiving these objections, Mr. Springhetti refers to documents or contracts previously produced in *Bennett v. ORC*, 2021-1198, and produced contemporaneously.

13. All communications with the Ohio Legislative Service Commission or any of its staff or directors relating to drawing any Proposed Plan.

**ANSWER:** Mr. Springhetti objects to the extent this request seeks information covered by the legislative privilege or R.C. 101.30. Mr. Springhetti further objects that this Request is unduly broad and overly burdensome given that the Ohio Legislative Service Commission

had nothing to do with the drafting of the Congressional Plan challenged in this action, which was passed by the Commission, not the General Assembly.

14. All communications relating to drawing any Proposed Plan, with (1) any current or former member of Ohio's General Assembly and (2) any current or former staff of any current or former member of Ohio's General Assembly.

**ANSWER:** Mr. Springhetti objects to the extent this request seeks information covered by the legislative privilege, the attorney client privilege, or the work-product privilege. Subject to and without waiving this objection, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

15. All communications relating to drawing any Proposed Plan with (1) any current or former U.S Representative or U.S. Senator including, without limitation, United States House of Representatives Republican Leadership and House Minority Leader Kevin McCarthy and (2) any current or former staff of any current or former U.S. Representative or U.S. Senator.

**ANSWER:** Mr. Springhetti objects to the extent this Request calls for information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. Springhetti also objects that this request is not relevant, as Mr. Springhetti's communications with current or former members of the US House of Representatives, the US Senate, or their staff, have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

16. All communications relating to drawing any Proposed Plan with the Republican National Committee, the Ohio Republican Party, including, without limitation, Robert Paduchik, the National Republican Redistricting Trust, the National Republican Congressional Committee, including, without limitation, National Republican Congressional Committee Chair Tom Emmer, or any political action committee.

**ANSWER:** Mr. Springhetti objects to the extent this Request seeks information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects to the extent that this Request seeks information not within his personal knowledge, or outside of his possession, custody, or control. Mr. Springhetti also objects that this request is not relevant, as, even if Mr. Springhetti had communications with these organizations, those communications have no bearing on whether or not the Congressional Plan passed by the Commission on March 2, 2022 violates the Ohio Constitution. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

17. All documents and communications regarding the potential, expected, or likely partisan performance or electoral outcomes of any district or districts in the 2021 Congressional Plan.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

18. All documents and communications related to the Section 1(C)(3)(d) statement.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges, and to the extent it seeks documents not in his possession, custody, or control. Subject to and without waiving these objections, Mr. Springhetti refers Petitioners to documents produced contemporaneously.

19. All documents and communications, dated between January 1, 2022, and the present, regarding the Ohio Supreme Court and/or any member of the Ohio Supreme Court, that relates in any way to the reapportionment of districts in Ohio or any decision of the Ohio Supreme Court thereof.

**ANSWER:** Mr. Springhetti objects to this Request to the extent it seeks information covered by the attorney-client, work product, or legislative privileges. Mr. Springhetti further objects that any communications or documents that merely reference the Ohio Supreme Court or its members is overbroad, unduly burdensome and represents an impermissible fishing expedition.

This the 19th day of April, 2022.

/s/ Phillip J. Strach

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*Counsel for Mr. Springhetti*

## CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of April, 2022, I have served the foregoing document by email:

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Jonathan.Blanton@ohioAGO.gov

Michael Walton  
[Michael.Walton@ohioAGO.gov](mailto:Michael.Walton@ohioAGO.gov)

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*Counsel for Petitioners*

/s/ Phillip J. Strach

# **Exhibit 19**

**To:** Routt, Randall[Randall.Routt@ohiosenate.gov];  
'chris@projectgovern.com'[chris@projectgovern.com]; Cherry, Sarah[Sarah.Cherry@ohiohouse.gov]  
**Cc:** Springhetti, Blake[Blake.Springhetti@ohiohouse.gov]; 'Emily Redman'[EERedman@ohioauditor.gov];  
Oliveti, Chris[coliveti@OhioSOS.Gov]; Aaron Crooks  
(aaron.crooks@governor.ohio.gov)[aaron.crooks@governor.ohio.gov]  
**From:** DiRossi, Ray  
**Sent:** Tue 3/1/2022 5:11:21 PM  
**Subject:** CD BAF  
[March 1 2022 CD BAF.xlsx](#)

....

>>>

All

Attached is a CD BAF that will be presented to the Commission this afternoon  
Senator Sykes requested that any such proposal be given to the Democrat staff and Democrat Commission  
members prior to the hearing  
Since this is being made available before being made public, please do not share until the Commission  
meeting.

Let me know if you have any issues accessing the BAF

**Ray DiRossi**

**Director of Finance and Budget**

**Ohio Senate Majority Caucus**

**Statehouse, Suite 205**

**Columbus, Ohio 43215**



(O) 614.466.4947

(C) 614.578.3848

[ray.dirosi@ohiosenate.gov](mailto:ray.dirosi@ohiosenate.gov)

# **Exhibit 20**

**To:** Springhetti, Blake[Blake.Springhetti@ohiohouse.gov]  
**Cc:** 'chris@projectgovern.com'[chris@projectgovern.com]; Cherry, Sarah[Sarah.Cherry@ohiohouse.gov]  
**From:** Routt, Randall  
**Sent:** Sat 2/26/2022 12:02:40 AM  
**Subject:** Meet to discuss Congressional map proposals

;

Blake,

Senator Sykes has directed to me to contact you so we can arrange a meeting to discuss and exchange congressional map proposals that meet the requirements of the Constitution and the Court order. Let me know when is a good time to connect. I have availability tomorrow morning and all day Sunday, and Monday.

Thanks,

Randall Routt

Policy Advisor

Senate Democratic Caucus

# **Exhibit 21**

**To:** Routt, Randall[Randall.Routt@ohiosenate.gov]; Springhetti, Blake[Blake.Springhetti@ohiohouse.gov]; 'eredman12@icloud.com'[eredman12@icloud.com]; Cherry, Sarah[Sarah.Cherry@ohiohouse.gov]; coliveti@ohiosos.gov[coliveti@ohiosos.gov]; Aaron.Crooks@governor.ohio.gov[Aaron.Crooks@governor.ohio.gov]; chris@projectgovern.com[chris@projectgovern.com]  
**Cc:** Strigari, Frank[Frank.Strigari@ohiosenate.gov]; Barron, John[John.Barron@ohiosenate.gov]; Disantis, Paul[Paul.Disantis@ohiohouse.gov]; Rowe, Mike[Mike.Rowe@ohiosenate.gov]; 'jmauk@ohiosos.gov'[jmauk@ohiosos.gov]; Leak, Traevon[Traevon.Leak@ohiosenate.gov]  
**From:** DiRossi, Ray  
**Sent:** Wed 3/2/2022 3:17:19 AM  
**Subject:** RE: Democratic Amendments to Republican March 1 Congressional Map

...  
>>>  
Randall  
Thanks for sending  
Ray

---

**From:** Routt, Randall  
**Sent:** Tuesday, March 01, 2022 9:36 PM  
**To:** DiRossi, Ray; Blake.Springhetti@ohiohouse.gov; 'eredman12@icloud.com'; sarah.cherry@ohiohouse.gov; coliveti@ohiosos.gov; Aaron.Crooks@governor.ohio.gov; chris@projectgovern.com  
**Cc:** Strigari, Frank; Barron, John; 'Paul.Disantis@ohiohouse.gov'; Rowe, Mike; 'jmauk@ohiosos.gov'; Leak, Traevon  
**Subject:** Democratic Amendments to Republican March 1 Congressional Map

Everyone,

As discussed in meetings this afternoon/evening I've enclosed proposed Democratic amendments to the Strigari March 1 Congressional Map.

<https://davesredistricting.org/join/03724078-b9b5-46c9-bcf0-d6d9e642e899>

Randall Routt  
Policy Advisor  
Senate Democratic Caucus