Supreme Court of Ohio Clerk of Court - Filed April 25, 2022 - Case No. 2022-0298

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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The Neiman Petitioners respectfully submit the following evidence:

VOLUME 1		
EX.	**DESCRIPTION**	**BATES RANGE**
A	Affidavit of Derek S. Clinger	NEIMAN_EVID_00001-NEIMAN_EVID_00009
1	Laura Hancock, "As congressional redistricting deadline looms, Ohio Senate Republicans head to sunny Florida for top-dollar fundraiser," Cleveland.com (Jan. 26, 2022)	NEIMAN_EVID_00010-NEIMAN_EVID_00012
2	2022 S.B. No. 286, As Introduced	NEIMAN_EVID_00013-NEIMAN_EVID_00014
3	General Assembly's website showing status of 2022 S.B. No. 286 as of March 3, 2022	NEIMAN_EVID_00015-NEIMAN_EVID_00016
4	Andy Chow, "Movement on new Ohio Congressional district map not expected for another week," Statehouse News Bureau (Jan. 28, 2022)	NEIMAN_EVID_00017-NEIMAN_EVID_00019
5	Announcement and agenda for the Ohio House Government Oversight Committee's Feb. 8, 2022 meeting (2nd Rev.)	NEIMAN_EVID_00020-NEIMAN_EVID_00022
6	Notice and agenda for the Ohio Senate Government Budget Committee's Feb. 8, 2022 meeting	NEIMAN_EVID_00023-NEIMAN_EVID_00024
7	Notice and agenda for the Ohio Senate Government Budget Committee's Feb. 9, 2022 meeting	NEIMAN_EVID_00025-NEIMAN_EVID_00026
8	Feb. 8, 2022, 9:18 AM Tweet by Josh Rultenberg	NEIMAN_EVID_00027-NEIMAN_EVID_00028
9	Feb. 8, 2022, 9:19 AM Tweet by Josh Rultenberg	NEIMAN_EVID_00029-NEIMAN_EVID_00030
10	Feb. 8, 2022, 10:10 AM Tweet by Josh Rultenberg	NEIMAN_EVID_000031-NEIMAN_EVID_000032
11	Feb. 8, 2022, 11:20 AM Tweet by Josh Rultenberg	NEIMAN_EVID_00033-NEIMAN_EVID_00036
12	Feb. 8, 2022, 12:30 PM Tweet by Josh Rultenberg	NEIMAN_EVID_00037-NEIMAN_EVID_00038
13	Feb. 22, 2022, 9:37 AM Tweet by Josh Rultenberg	NEIMAN_EVID_00039-NEIMAN_EVID_00040
14	March 1, 2022, 12:25 PM Tweet by Josh Rultenberg	NEIMAN_EVID_00041-NEIMAN_EVID_00042

15	March 1, 2022, 12:28 PM Tweet by Josh Rultenberg	NEIMAN_EVID_00043-NEIMAN_EVID_00044
16	March 1, 2022, 12:51 PM Tweet by Josh Rultenberg	NEIMAN_EVID_00045-NEIMAN_EVID_00046
17	March 1, 2022, 2:06 PM Tweet by Josh Rultenberg	NEIMAN_EVID_00047-NEIMAN_EVID_00050
18	Jessie Balmert, "Ohio voters just approved Issue 1 to curb gerrymandering in Congress," Cincinnati Enquirer (May 8, 2018)	NEIMAN_EVID_00051-NEIMAN_EVID_00052
19	Secretary of State's Directive 2022-27	NEIMAN_EVID_00053-NEIMAN_EVID_00056
20	Secretary of State's Form No. 2-Y	NEIMAN_EVID_00057-NEIMAN_EVID_00058
21	Secretary of State's "County Populations and Filing Locations" for March 2, 2022 congressional district plan	NEIMAN_EVID_00059-NEIMAN_EVID_00063
22	Secretary of State's "County Populations and Filing Locations" for S.B. 258 congressional district plan	NEIMAN_EVID_00064-NEIMAN_EVID_00068
23	Bipartisan statement in support of Ohio's 2015 Issue 1	NEIMAN_EVID_00069-NEIMAN_EVID_00070

VOLUME 2		
EX.	**DESCRIPTION**	**BATES RANGE**
24	Dr. Rodden's Expert Affidavit, *Adams v. DeWine*, Case No. 2021-1428 (submitted Dec. 10, 2021)	NEIMAN_EVID_00071-NEIMAN_EVID_00148
25	Dr. Chen's Expert Affidavit, *Adams v. DeWine*, Case No. 2021-1428 (submitted Dec. 10, 2021)	NEIMAN_EVID_00149-NEIMAN_EVID_00217
26	Dr. Imai's Expert Affidavit, *League of Women Voters of Ohio v. Ohio Redistricting Commission*, Case No. 2021-1449 (submitted Dec. 10, 2021)	NEIMAN_EVID_00218-NEIMAN_EVID_00276
27	Dr. Handley's Expert Affidavit, *League of Women Voters of Ohio v. Ohio Redistricting Commission*, Case No. 2021-1449 (submitted Dec. 10, 2021)	NEIMAN_EVID_00277-NEIMAN_EVID_00303
28	Dr. Warshaw's Expert Affidavit, *League of Women Voters of Ohio v. Ohio Redistricting Commission*, Case No. 2021-1449 (submitted Dec. 10, 2021)	NEIMAN_EVID_00304-NEIMAN_EVID_00340

VOLUME 3		
EX.	**DESCRIPTION**	**BATES RANGE**
29	Dr. Rodden's Expert Affidavit, *Adams v. DeWine*, Case No. 2021-1428 (submitted March 4, 2022)	NEIMAN_EVID_00341-NEIMAN_EVID_00386
30	Dr. Chen's Expert Affidavit, *Adams v. DeWine*, Case No. 2021-1428 (submitted March 4, 2022)	NEIMAN_EVID_00387-NEIMAN_EVID_00442
31	Dr. Imai's Expert Affidavit, *League of Women Voters of Ohio v. Ohio Redistricting Commission*, Case No. 2021-1449 (submitted March 7, 2022)	NEIMAN_EVID_00443-NEIMAN_EVID_00462
32	Dr. Warshaw's Expert Affidavit, *League of Women Voters of Ohio v. Ohio Redistricting Commission*, Case No. 2021-1449 (submitted March 7, 2022)	NEIMAN_EVID_00463-NEIMAN_EVID_00498

VOLUME 4		
EX.	**DESCRIPTION**	**BATES RANGE**
33	AOS_000210	NEIMAN_EVID_00499-NEIMAN_EVID_00500
34	AOS_000464-AOS_000465	NEIMAN_EVID_00501-NEIMAN_EVID_00503
35	AOS_000466-AOS_000467	NEIMAN_EVID_00504-NEIMAN_EVID_00506
36	AOS_000469-AOS_000470	NEIMAN_EVID_00507-NEIMAN_EVID_00509
37	AOS_000483-AOS_000484	NEIMAN_EVID_00510-NEIMAN_EVID_00512
38	AOS_000503-AOS_000505	NEIMAN_EVID_00513-NEIMAN_EVID_00516
39	AOS_000512-AOS_000513	NEIMAN_EVID_00517-NEIMAN_EVID_00519
40	AOS_000525-AOS_000526	NEIMAN_EVID_00520-NEIMAN_EVID_00522
41	AOS_000529-AOS_000531	NEIMAN_EVID_00523-NEIMAN_EVID_00526
42	AOS_000548	NEIMAN_EVID_00527-NEIMAN_EVID_00528
43	AOS_000550	NEIMAN_EVID_00529-NEIMAN_EVID_00530

44	AOS_000552	NEIMAN_EVID_00531-NEIMAN_EVID_00532
45	AOS_000554	NEIMAN_EVID_00533-NEIMAN_EVID_00534
46	AOS_000580-AOS_000583	NEIMAN_EVID_00535-NEIMAN_EVID_00539
47	AOS_000687-AOS_000688	NEIMAN_EVID_00540-NEIMAN_EVID_00542
48	AOS_001290-AOS_001302	NEIMAN_EVID_00543-NEIMAN_EVID_00556
49	AOS_001306-AOS_001312	NEIMAN_EVID_00557-NEIMAN_EVID_00564
50	AOS_001392-AOS_001393	NEIMAN_EVID_00565-NEIMAN_EVID_00567
51	AOS_001444-AOS_001448	NEIMAN_EVID_00568-NEIMAN_EVID_00569
52	AOS_001452	NEIMAN_EVID_00574-NEIMAN_EVID_00575
53	CUPP000001-CUPP000002	NEIMAN_EVID_00576-NEIMAN_EVID_00578
54	CUPP000010 and five images files attached thereto	NEIMAN_EVID_00579-NEIMAN_EVID_00585
55	DiRossi_000078	NEIMAN_EVID_00586-NEIMAN_EVID_00587
56	DiRossi_000125	NEIMAN_EVID_00588-NEIMAN_EVID_00589
57	DiRossi_000154-DiRossi_000155	NEIMAN_EVID_00590-NEIMAN_EVID_00592
58	DiRossi_000165-DiRossi_000166	NEIMAN_EVID_00593-NEIMAN_EVID_00595
59	GOV_000196- GOV_000197	NEIMAN_EVID_00596-NEIMAN_EVID_00598
60	Huffman_001755	NEIMAN_EVID_00599-NEIMAN_EVID_00600
61	Huffman_002038-Huffman_002039	NEIMAN_EVID_00601-NEIMAN_EVID_00603
62	Huffman_002060-Huffman_002061	NEIMAN_EVID_00604-NEIMAN_EVID_00606

63	SOS_000630-SOS_000631	NEIMAN_EVID_00607-NEIMAN_EVID_00609
64	SOS_000780	NEIMAN_EVID_00610-NEIMAN_EVID_00611
65	SOS_000781-SOS_000786	NEIMAN_EVID_00612-NEIMAN_EVID_00618
66	SPRINGHETTI_000032-SPRINGHETTI_000043	NEIMAN_EVID_00619-NEIMAN_EVID_00631
67	SPRINGHETTI_000094-SPRINGHETTI_000095	NEIMAN_EVID_00632-NEIMAN_EVID_00634
68	SPRINGHETTI_000098-SPRINGHETTI_000106	NEIMAN_EVID_00635-NEIMAN_EVID_00644
69	House Speaker Bob Cupp's written responses to the Neiman Petitioners' First Set of Interrogatories	NEIMAN_EVID_00645-NEIMAN_EVID_00658
70	House Speaker Bob Cupp's written responses to the Neiman Petitioners' First Set of Requests for Production of Documents	NEIMAN_EVID_00659-NEIMAN_EVID_00671
71	Senate President Matt Huffman's written responses to the Neiman Petitioners' First Set of Interrogatories	NEIMAN_EVID_00672-NEIMAN_EVID_00686
72	Senate President Matt Huffman's written responses to the Neiman Petitioners' First Set of Requests for Production of Documents	NEIMAN_EVID_00687-NEIMAN_EVID_00698
73	House Speaker Bob Cupp and Senate President Matt Huffman's objections and responses to [LWVO] Petitioners' First Set of Requests for Production and Interrogatories to Respondents	NEIMAN_EVID_00699-NEIMAN_EVID_00706
74	Secretary of State Frank LaRose's written responses to the Neiman Petitioners' First Set of Interrogatories and LWVO Petitioners' Second Set of Interrogatories	NEIMAN_EVID_00707-NEIMAN_EVID_00726
75	Secretary of State Frank LaRose's responses to the Neiman Petitioners' First Set of Requests for Production of Documents and LWVO Petitioners' Second Set of Requests for Production of Documents	NEIMAN_EVID_00727-NEIMAN_EVID_00736
76	Ohio Governor Mike DeWine's Objections and Respondents to [Neiman Petitioners'] Subpoena Duces Tecum	NEIMAN_EVID_00737-NEIMAN_EVID_00746
77	Ohio Auditor Keith Faber's Objections and Respondents to [Neiman Petitioners'] Subpoena Duces Tecum	NEIMAN_EVID_00747-NEIMAN_EVID_00756
78	Ray DiRossi's Objections and Respondents to [Neiman Petitioners'] Subpoena Duces Tecum	NEIMAN_EVID_00757-NEIMAN_EVID_00767

79	Blake Springhetti's Objections and Respondents to [Neiman Petitioners'] Subpoena Duces Tecum	NEIMAN_EVID_00768-NEIMAN_EVID_00778

VOLUME 5 (USB Drive)	
EX.	**DESCRIPTION**
80	The shape file for the November 2021 congressional district plan adopted by the General Assembly
81	The block assignment files for each of the 1,000 computer-simulated plans produced by Dr. Jowei Chen and discussed in his December 10, 2021 and March 4, 2022 expert affidavits
82	Blocks_03.01.xlsx (AOS_000555)
83	Faber_as_Sent_OCURD.xlsx (AOS_000532)
84	Faber_CD_BAF_March_1.xlsx (AOS_000211)
85	Faber_Equal_Pop_-_Daves_BAF.csv (AOS_000527)
86	Faber_Equal_Pop_-_Maptitude_BAF.xlsx (AOS_000528)
87	SPRINGHETTI_000044.xlsx (SPRINGHETTI_000044)

Respectfully submitted,

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