

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

LEAGUE OF WOMEN VOTERS	:	
OF OHIO, et al,	:	
	:	
Plaintiffs,	:	CASE NO. 2:20-CV-1638
	:	
v.	:	CASE NO. 2:20-CV-1638
	:	
FRANK LAROSE,	:	
	:	
Defendant.	:	

PROPOSED NOTICE OF DEFENSES OF THE STATE OF OHIO

Pursuant to Federal Rule of Civil Procedure 24(c), Ohio Attorney General Dave Yost, on behalf of proposed intervenor State of Ohio, sets forth the following defenses, which will be fully set forth in the pleadings or motions, as appropriate:

1. House Bill 197 does not violate the National Voter Registration Act of 1993, 52 U.S.C. § 2050.
2. House Bill 197 is constitutional.

Respectfully submitted,
DAVE YOST
OHIO ATTORNEY GENERAL

/s/ Julie Pfeiffer

JULIE PFEIFFER (0069762)
ANN YACKSHAW (0090623)
Assistant Attorneys General
Constitutional Offices Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3428
Tel: 614-466-2872 | Fax: 614-728-7592
Julie.Pfeiffer@OhioAttorneyGeneral.gov
Ann.Yackshaw@OhioAttorneyGeneral.gov

*Counsel for Proposed Intervenor
State of Ohio*