

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

League of Women Voters of Ohio, et al.,	:	
	:	Case No. 2:20-cv-01638
Plaintiffs,	:	
	:	Judge Michael H. Watson
v.	:	
	:	Chief Magistrate Judge Deavers
Frank LaRose, in his official capacity as	:	
Secretary of State of Ohio,	:	
	:	
Defendant.	:	

PROPOSED ANSWER OF INTERVENOR-DEFENDANT, OHIO REPUBLICAN PARTY, TO AMENDED COMPLAINT

NOW COMES the Ohio Republican Party (“ORP”), Proposed Intervenor-Defendant in the above-captioned action, and answers Plaintiffs’ Amended Complaint as follows:

1. ORP denies the allegations in Paragraph 1.
2. In response to the allegations in Paragraph 2, ORP states House Bill 197 speaks for itself.
3. ORP denies the allegations in Paragraph 3 for lack of knowledge.
4. ORP denies the allegations in Paragraph 4.
5. ORP denies the allegations in Paragraph 5.
6. Paragraph 6 is an opinion statement of the Plaintiffs to which no admissions or denials are required.
7. ORP denies the allegations in Paragraph 7 for lack of knowledge.
8. ORP denies the allegations in Paragraph 8 for lack of knowledge.
9. ORP denies the allegations in Paragraph 9 for lack of knowledge.
10. ORP denies the allegations in Paragraph 10 for lack of knowledge.

11. ORP denies the allegations in Paragraph 11 for lack of knowledge.
12. ORP denies the allegations in Paragraph 12 for lack of knowledge.
13. ORP denies the allegations in Paragraph 13 for lack of knowledge.
14. ORP denies the allegations in Paragraph 14 for lack of knowledge.
15. ORP denies the allegations in Paragraph 15 for lack of knowledge.
16. ORP denies the allegations in Paragraph 16 for lack of knowledge.
17. ORP denies the allegations in Paragraph 17 for lack of knowledge.
18. ORP admits the allegations in Paragraph 18.
19. In response to the allegations in Paragraph 19, ORP states that the cited statutes speak for themselves, and no admission or denial is required.
20. In response to the allegations in Paragraph 20, ORP states that the cited statute speaks for itself, and no admission or denial is required.
21. In response to the allegations in Paragraph 21, ORP states that the cited statute speaks for itself, and no admission or denial is required.
22. In response to Paragraph 22, ORP states the paragraph is a position statement of the Plaintiffs, to which no admissions or denials are required.
23. In response to the allegations in Paragraph 23, ORP admits that the Court has jurisdiction. The remaining allegations are positional statements of the Plaintiffs, to which no admission or denials are required.
24. Paragraph 24 sets forth a legal conclusion to which no response is necessary.
25. Paragraph 25 sets forth a legal conclusion to which no response is necessary.
26. ORP admits the allegations in Paragraph 26.
27. ORP admits the allegations in Paragraph 27.

28. ORP admits the allegations in Paragraph 28.

29. ORP admits the allegations in Paragraph 29.

30. ORP admits the allegations in Paragraph 30.

31. ORP admits the allegations in Paragraph 31.

32. ORP admits the allegations in Paragraph 32.

33. ORP admits the allegations in Paragraph 33.

34. ORP admits the allegations in Paragraph 34.

35. ORP admits the allegations in Paragraph 35.

36. In response to the allegations in Paragraph 36, ORP states the Defendant Secretary's Directive 2020-06 speaks for itself.

37. ORP admits the allegations in Paragraph 37.

38. In response to the allegations in Paragraph 38, ORP admits that Plaintiffs LWVO and Ohio APRI submitted a brief as amici curiae to the Ohio Supreme Court. As to the remaining allegations, ORP states the brief of amici curiae speaks for itself

39. ORP denies the allegations in Paragraph 39 for lack of knowledge.

40. ORP admits the allegations in Paragraph 40.

41. ORP denies the allegations Paragraph 41 for lack of knowledge.

42. ORP admits the allegations in Paragraph 42.

43. ORP admits the allegations in Paragraph 43, and states further that the Ohio General Assembly did in fact assert its authority through the passage of House Bill 197.

44. In response to the allegations in Paragraph 44, ORP states the cited material from the Secretary's letter speaks for itself.

45. In response to the allegations in Paragraph 45, ORP states the cited material from the Secretary's letter speaks for itself.

46. In response to the allegations in Paragraph 46, ORP states the cited material from the Secretary's letter speaks for itself.

47. In response to the allegations in Paragraph 47, ORP admits the OAE0 sent a letter to the Ohio General Assembly members and states that the letter speaks for itself.

48. ORP admits the allegations in Paragraph 48, but states that House Bill 197 speaks for itself and provides for absentee ballots for all registered voters.

49. ORP admits the allegations in Paragraph 49.

50. In response to allegations in Paragraph 50, ORP states House Bill 197 speaks for itself.

51. In response to the allegations in Paragraph 51, ORP states House Bill 197 speaks for itself.

52. In response to the allegations in Paragraph 52, ORP states House Bill 197 speaks for itself.

53. In response to the allegations in Paragraph 53, ORP states House Bill 197 speaks for itself.

54. In response to the allegations in Paragraph 54, ORP states House Bill 197 speaks for itself.

55. In response to the allegations in Paragraph 55, ORP states House Bill 197 speaks for itself.

56. In response to the allegations in Paragraph 56, ORP states House Bill 197 speaks for itself.

57. Paragraph 57 calls for a legal conclusion, and therefore no response is necessary.
58. In response to the allegations in Paragraph 58, ORP states House Bill 197 speaks for itself.
59. In response to the allegations in Paragraph 59, ORP states House Bill 197 speaks for itself.
60. Paragraph 60 calls for a legal conclusion, and therefore no response is necessary.
61. ORP denies allegations in Paragraph 61 for lack of knowledge.
62. ORP denies allegations in Paragraph 62 for lack of knowledge.
63. ORP denies allegations in Paragraph 63 for lack of knowledge.
64. ORP denies allegations in Paragraph 64 for lack of knowledge.
65. ORP denies allegations in Paragraph 65 for lack of knowledge.
66. ORP denies allegations in Paragraph 66 for lack of knowledge.
67. ORP denies the allegations in Paragraph 67, including the characterization of House Bill 197's process.
68. In response to Paragraph 68, ORP states the public statements of the Secretary and the OAEO speak for themselves.
69. ORP denies allegations in Paragraph 69 for lack of knowledge.
70. ORP denies allegations in Paragraph 70 for lack of knowledge.
71. ORP denies allegations in Paragraph 71 for lack of knowledge.
72. ORP denies allegations in Paragraph 72 for lack of knowledge.
73. ORP denies the allegations in Paragraph 73.
74. ORP denies the allegations in Paragraph 74 for lack of knowledge.
75. ORP denies the allegations in Paragraph 75 for lack of knowledge.

76. ORP denies the allegations in Paragraph 76 for lack of knowledge.

77. ORP denies the allegations in Paragraph 77 for lack of knowledge.

78. ORP denies the allegations in Paragraph 78 for lack of knowledge.

79. ORP denies the allegations in Paragraph 79 for lack of knowledge.

80. ORP denies the allegations in Paragraph 80 for lack of knowledge.

81. ORP denies the allegations in Paragraph 81 for lack of knowledge.

82. In response to the allegations in Paragraph 82, ORP states that H.B. 197 speaks for itself.

83. ORP denies the allegations in Paragraph 83.

84. ORP denies the allegations in Paragraph 84 for lack of knowledge.

85. ORP denies the allegations in Paragraph 85 for lack of knowledge.

86. ORP denies the allegation in Paragraph 86 for lack of knowledge.

87. ORP denies the allegation in Paragraph 87 for lack of knowledge.

88. ORP denies the allegation in Paragraph 88 for lack of knowledge.

89. ORP denies the allegation in Paragraph 89 for lack of knowledge.

90. In response to Paragraph 90, the ORP incorporates by reference its responses to Paragraphs 1-89.

91. In response to the allegations in Paragraph 91, ORP states that H.B. 197 speaks for itself.

92. In response to the allegations in Paragraph 92, ORP states that the National Voter Registration Act of 1993 speaks for itself.

93. In response to the allegations in Paragraph 93, ORP states that the National Voter Registration Act of 1993 speaks for itself.

94. ORP denies the allegations in Paragraph 94.

95. ORP denies the allegations in Paragraph 95.

96. In response to Paragraph 96, the ORP incorporates by reference its responses to Paragraphs 1-95.

97. In response to the allegations in Paragraph 97, ORP states that the quoted case law speaks for itself.

98. ORP denies the allegations in Paragraph 98.

99. In response to the allegations in Paragraph 99, ORP states that H.B. 197 speaks for itself and denies the statements attributed to the OAEO for lack of knowledge.

100. ORP denies the allegations in Paragraph 100 for lack of knowledge.

101. ORP denies the allegations in Paragraph 101 for lack of knowledge.

102. In response to the allegations in Paragraphs 102, ORP states that H.B. 197 speaks for itself.

103. In response to the allegations in Paragraph 103, ORP states that H.B. 197 speaks for itself.

104. In response to the allegations in Paragraph 104, ORP states that H.B. 197 speaks for itself and denies for lack of knowledge the statements attributed to election officials.

105. ORP denies the allegations in Paragraph 105 for lack of knowledge.

106. ORP denies the allegations in Paragraph 106.

107. Plaintiffs' Prayer for Relief does not require admissions or denials.

108. Any allegation not expressly admitted by ORP is denied.

109. ORP expressly reserves the right to amend or supplement this Proposed Answer.

Respectfully submitted,

/s/ Anne Marie Sferra

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2020, I caused a true and correct copy of the foregoing document to be served upon all counsel of record registered with the Court's ECF system, by electronic service via the Court's ECF transmission facilities.

/s/ Anne Marie Sferra

Anne Marie Sferra (0030855)