

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

LEAGUE OF WOMEN VOTERS OF OHIO, et al.,

Plaintiffs,

v.

FRANK LAROSE, et al.,

Defendants.

CASE NO. 2:20-CV-1638

JUDGE MICHAEL H. WATSON

**MOTION FOR LEAVE TO FILE INSTANTER BRIEF OF AMICUS CURIAE IN
SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER**

Pursuant to S.D. Ohio Civ. R. 7.2(a), Amicus Curiae Disability Rights Ohio respectfully requests leave of this Court to file an amicus brief in support of Plaintiffs' Motion for Temporary Restraining Order.¹ This motion is supported by the following memorandum. The brief Disability Rights Ohio proposes to file is attached as Exhibit A.

Respectfully submitted,

/s/Kevin J. Truitt

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¹ In compliance with S.D. Ohio Civ. R. 7.3(b), on April 2, 2020, counsel for Amicus Curiae Disability Rights Ohio contacted counsel for Plaintiffs, Intervenor-Plaintiff, Intervenor-Defendants, and Defendants. Counsel for Plaintiffs, Intervenor-Plaintiff Libertarian Party of Ohio, Intervenor-Defendant Ohio Democratic Party consented to the filing. Amicus Curiae Disability Rights Ohio did not receive a response from Intervenor-Defendant State of Ohio, Intervenor Defendant Ohio Republican Party, and Defendant Frank LaRose.

MEMORANDUM IN SUPPORT

Disability Rights Ohio seeks to file a brief as amicus curiae as the only statewide legal advocacy organization whose mission it is to advocate for the human, civil and legal rights of Ohioans with disabilities. The COVID-19 public health crisis is also a disability rights concern. The right to vote is a human, legal and civil right of people with disabilities, and is a matter of great public interest.

Amicus briefs are particularly helpful where the issue is a matter of great public interest, and in such cases leave is generally granted. Disability Rights Ohio's brief provides the Court with useful information about the need for expanded voting options and meaningful opportunities to cast a ballot in the 2020 primary election. This brief was filed in a timely manner in this fast-evolving judicial review process.

STATEMENT OF INTEREST

Disability Rights Ohio ("DRO") is a not-for-profit organization designated by the Ohio Governor as the protection and advocacy system under federal law for people with disabilities in Ohio. *See* 42 U.S.C. § 15001, *et seq.*; Ohio Rev. Code. § 5123.60. The mission of DRO is to advocate for the human, civil, and legal rights of people with disabilities in Ohio. As the protection and advocacy system for Ohio, DRO investigates abuse, neglect, and rights violations affecting people with disabilities; pursues administrative, legal, and policy remedies to address identified violations; and advocates for individuals in many areas of disability rights, including voting, housing, employment, government benefits and services, and special education.

Voting rights for people with disabilities is an important aspect of DRO's work, and is reflected in the organization's priorities. This work includes education and outreach to voters with disabilities and professionals in the disability field, direct and systemic voter advocacy, and operating a voter hotline every Election Day. DRO also engages in voting-related litigation.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed electronically on April 3, 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/Kevin J. Truitt
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