

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

**NORTHEAST OHIO COALITION FOR
THE HOMELESS, *et al.*,**

Plaintiffs,

v.

**FRANK LAROSE, in his official capacity as
Ohio Secretary of State,**

Defendant,

and

**OHIO REPUBLICAN PARTY, SANDRA
FEIX, AND MICHELE LAMBO,**

Intervenor-Defendants.

Civil Action No. 1:23-cv-26

Judge Donald C. Nugent
Magistrate Judge Jonathan D. Greenberg

INTERVENOR-DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Sandra Feix, Michele Lambo, and the Ohio Republican Party (“Intervenor-Defendants”) support and seek to uphold free and fair elections on behalf of all Ohioans. Intervenor-Defendants therefore respectfully move the Court to uphold the Ohio General Assembly’s duly enacted laws governing Ohio’s elections and to enter summary judgment against Plaintiffs. Intervenor-Defendants submit the accompanying memorandum in support demonstrating that summary judgment is warranted because House Bill 458 and House Bill 45 do not violate the First or Fourteenth Amendments.

Intervenor-Defendants respectfully request that the Court grant this motion and enter judgment in their favor.

Dated: October 6, 2023

Respectfully submitted,

/s/ John M. Gore

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CERTIFICATE OF SERVICE

I certify that on October 6, 2023, a copy of the foregoing Motion for Summary Judgment was filed electronically. 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. Parties may access this filing through the Court's system.

/s/ John M. Gore

John M. Gore

Attorney for Intervenor-Defendants

LOCAL RULE 7.1(F) CERTIFICATION

Intervenor-Defendants certify that this case has been assigned to the standard case management track and that the memorandum adheres to the page limitation specifications of the Court's order of October 2, 2023. Dkt. 45.

/s/ John M. Gore

John M. Gore

Attorney for Intervenor-Defendants