

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

LEAGUE OF WOMEN VOTERS OF OHIO
AND JENNIFER KUCERA,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 1:23-cv-02414

Judge Bridget Meehan Brennan

INTERVENORS' MOTION FOR SUMMARY JUDGMENT

The Republican National Committee and the Ohio Republican Party (the “Intervenors”) support and seek to uphold free and fair elections on behalf of all Ohioans. Intervenors 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. Intervenors submit the accompanying memorandum in support demonstrating that summary judgment is warranted because the challenged provisions are lawful. R.C. § 3599.21(A)(9) and R.C. § 3509.05(C)(1) do not violate 42 U.S.C. § 12132, 29 U.S.C. § 794, 42 U.S.C. § 1983, 52 U.S.C. § 10508, or the Fifth or Fourteenth Amendments to the United States Constitution. Accordingly, Intervenors respectfully request that the Court grant this motion and enter judgment in their favor.

Dated: May 24, 2024

Respectfully submitted,

/s/ John M. Gore

John M. Gore (*pro hac vice*)
E. Stewart Crosland (*pro hac vice*)
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
jmgore@jonesday.com
scrosland@jonesday.com
Telephone: (202) 879-3939
Facsimile: (202) 626-1700

Sarah Welch (99171)
Jesse T. Wynn (101239)
JONES DAY
North Point, 901 Lakeside Avenue
Cleveland, OH 44114
swelch@jonesday.com
jwynn@jonesday.com
Telephone: (216) 586-3939
Facsimile: (216) 579-0212

*Attorneys for Intervenors Republican National
Committee and Ohio Republican Party*

CERTIFICATE OF SERVICE

I certify that on May 24, 2024, 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 expedited case management track and that the memorandum adheres to the page limitations specified in the Court's order of May 7, 2024.

/s/ John M. Gore

John M. Gore

Attorney for Intervenor-Defendants