

In the  
**Supreme Court of Ohio**

STATE ex rel. THE CINCINNATI  
ENQUIRER, A Division of The Gannett  
Satellite Network,

Petitioner,

v.

BARBARA RILEY, DIRECTOR OF OHIO  
DEPARTMENT OF JOB AND FAMILY  
SERVICES,

Respondent.

Case No. 06-2239

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**MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF**

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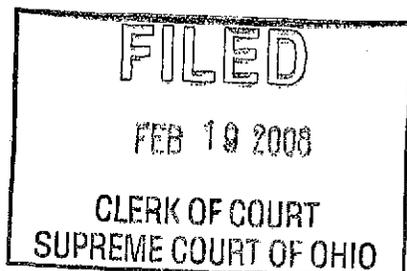
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**MOTON FOR LEAVE TO FILE SUPPLEMENTAL BRIEF**

Although the Court's Rule IX, Section 9, expresses a general bar against post-argument filings, except for supplemental authority, the rule specifically notes that parties may not file such documents "[u]nless ordered by the Supreme Court." Thus, Respondent Helen Jones-Kelley asks the Court to order the parties to submit such supplemental filings.

Supplemental briefing is warranted here because the statutes at issue were amended just last week. On February 13, 2008, Governor Strickland signed House Bill 214 into law, amending, among other laws, both R.C. 149.43 and R.C. 5101.29.

Respondent suggests that the Court will be best served if both parties file briefs addressing the implications of these new enactments. Such briefs will permit the parties to discuss the new law's implications for both the statutory interpretation issues raised in the case and the application of the good-sense exception to the public records law.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Leave to File Supplement Brief was sent by U.S. Mail on this 19<sup>th</sup> day of February, 2008, to the following counsel:

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