

ORIGINAL

IN THE SUPREME COURT OF OHIO

Board of Education of the City School
District of the City of Cincinnati,

Appellant,

v.

Roger T. Conners, et al.,

Appellees.

Case No. 2011-0673

On Appeal From the Hamilton County
Court Of Appeals, First Appellate
District

**MOTION OF AMICI CURIAE OHIO ALLIANCE FOR PUBLIC CHARTER
SCHOOLS, BLACK ALLIANCE FOR EDUCATIONAL OPPORTUNITIES,
NATIONAL ALLIANCE FOR PUBLIC CHARTER SCHOOLS,
OHIO COALITION FOR QUALITY EDUCATION, AND SCHOOL CHOICE OHIO
TO PARTICIPATE IN ORAL ARGUMENT**

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Rule 9.6(A) of the Rules of Practice of the Supreme Court of Ohio permits counsel for amicus curiae to present oral argument if the side that the amicus curiae supports gives permission and the Court grants leave to do so. Here, the Ohio Alliance for Public Charter Schools, the Black Alliance for Educational Options, the National Alliance for Public Charter Schools, the Ohio Coalition for Quality Education, and School Choice Ohio (collectively, the “Charter School Amici”) support Appellees Dr. Roger T. Conners, et al. Maurice A. Thompson, counsel for Appellees Dr. Roger T. Conners, et al., has given Chad A. Readler, counsel for the Charter School Amici, permission to present oral argument in this case, and to share the argument time otherwise allowed to Appellees. The Charter School Amici thus respectfully request that the Court grant Mr. Readler leave to do so. The Court should do so because Appellant Board of Education of the City School District of the City of Cincinnati seeks to circumvent clear Ohio public policy by placing deed restrictions on its property to prohibit future use of the property by charter schools. Such efforts threaten to exacerbate the already imposing challenges these public schools face in obtaining suitable facilities—challenges that hinder the educational choices of Ohio’s students contrary to the General Assembly’s intent. Accordingly, argument on behalf of the Charter School Amici, which have a unique understanding of these issues, may help the Court in its decisional process.

Dated: January 26, 2012

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion of Amici Curiae of Ohio Alliance for Public Charter Schools, Black Alliance for Educational Opportunities, National Alliance for Public Charter Schools, Ohio Coalition for Quality Education, and School Choice Ohio to Participate in Oral Argument was served by ordinary U.S. Mail, on January 26, 2012, on the following:

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