

ORIGINAL

IN THE SUPREME COURT OF OHIO

State ex. rel. Ohio Civil Service	:	
Employees Association et. al.,	:	Supreme Court Case No. 14-319
	:	
Appellees-Cross-Appellants	:	
	:	On Appeal from the Franklin County
v.	:	Court of Appeals, Tenth Appellate District
	:	
State of Ohio et. al.,	:	
	:	Court of Appeals Case No.
Appellants-Cross-Appellees	:	12 AP 1064
	:	

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**PLAINTIFFS-APPELLEES  
NOTICE OF CROSS-APPEAL**

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**CROSS-APPEAL BY**  
**PLAINTIFFS-APPELLEES CROSS-APPELLANTS**

Plaintiffs-Appellees Cross-Appellants, Ohio Civil Service Employees Association, David Combs, Clair Crawford, Lori Leach Douce, Margo Hall, Shelia Herron, Daniel Karcher, Rebecca Sayers, Angela Schuster, Troy Tackett, Kathy Tinker, Lisa Zimmerman, and ProgressOhio.org hereby give notice of their cross-appeal to the Supreme Court of Ohio from the Final Decision and Entry of the Tenth District Court of Appeals in the case of *State ex rel. Ohio Civil Service Employees Association et al., v. State of Ohio et al.*, Case No. 12 AP-1064 journalized on October 28, 2013. A timely application for reconsideration was filed on November 5, 2013. The Court of Appeals decision denying the application for reconsideration was filed on January 16, 2014.

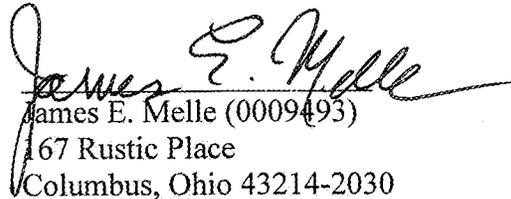
Notices of Appeal were previously filed by the Defendants-Appellants State of Ohio, Governor John R. Kasich, Attorney General Mike DeWine, Secretary of State Jon Husted, Auditor of State David Yost, Ohio Department of Rehabilitation and Correction, and Director Gary C. Mohr, Ohio Department of Administrative Services and Director Robert Blair, State Treasurer Josh Mandel, Office of Budget and Management and Director Timothy S. Keen and Defendant-Appellant Management & Training Corporation.

Plaintiffs-Appellees Cross-Appellants appeal two (2) of the rulings made by the Court of Appeals. First, that that no set of facts in their complaint, if proven, would entitle them to relief because Article VIII, Section 4 of the Ohio Constitution was not violated (Decision 14, ¶39). Second, that SERB had exclusive jurisdiction to determine whether the employees in the two privatized prisons were public employees. (Decision 16, ¶49).

This cross-appeal raises a substantial constitutional issue and another issue of great and public interest.

Pursuant to S. Ct. Prac. R. 7.01(A)(2)(a), this Notice of Cross-Appeal is filed within ten (10) days after the first Notice of Appeal which was filed on March 3, 2014.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing Notice of Cross-Appeal was served via ordinary mail upon the following persons this 11<sup>th</sup> day of March, 2014:

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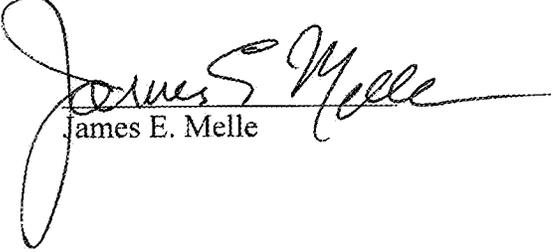
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