

IN THE SUPREME COURT OF OHIO

State of Ohio, *ex rel.* Renee Walker, *et al.*, )  
*Relators,* ) **Case No. 2015-1371**  
v. )  
Jon Husted, Secretary of State of Ohio, ) **Expedited Election Case Pursuant**  
*Respondent,* ) **To S.C.R.P. 12.03**  
And ) **INTERVENING RESPONDENT**  
Joanne Dove Prisley, *et al.*, ) **JOANNE DOVE PRISLEY'S**  
*Intervening Respondents.* ) **MOTION FOR LEAVE TO FILE**  
**AMENDED MERIT BRIEF**

Michael M. Hollingsworth (0002556)  
39 North College Street, P.O. Box 428  
Athens, Ohio 45701  
740-593-5828 (o)  
mike@mmhlaw.us

COUNSEL FOR INTERVENING RESPONDENT  
JOANNE DOVE PRISLEY  
MIKE DEWINE, OHIO ATTORNEY GENERAL

Kurt A. Tunnell (0038569)  
Anne Marie Sferra (0030855)  
Counsel of Record  
Brickler & Eckler LLP  
100 South Third Street  
Columbus, Ohio 43215  
(614) 728-4948 (o) (614) 227-2390 (f)  
ktunnell@bricker.comasferra@bricker.com

COUNSEL FOR RESPONDENT JON HUSTED,  
SECRETARY OF STATE OF OHIO

Charles Saunders (0090266)  
6772 US Highway 20  
Metamora, Ohio 43540-9739  
(419) 280-0731 (o) (877) 472-1863 (f)  
saunderslitigation@gmail.com

INTERVENING RESPONDENT CHARLES  
SAUNDERS PROCEEDING *PRO SE* AND  
COUNSEL FOR INTERVENING RESPONDENTS  
R.J. LUMBREZER, AND ROY NORMAN

James Kinsman (0090038)  
P.O. Box 24313  
Cincinnati, Ohio 45224  
(513) 549-3369 (o)  
james@jkinsmanlaw.com

Terry J. Lodge (0029271)  
316 N. Michigan St., Suite 520  
Toledo, OH 43604-5627  
419-205-7084 (o)  
lodgelaw@yahoo.com

CO-COUNSEL FOR RELATORS

Curt C. Hartman (0064242)  
7394 Ridgepoint Drive, Suite 8  
Cincinnati, Ohio 45230  
(513) 379-2923 (o)  
hartmanlawfirm@fuse.net

COUNSEL FOR INTERVENING RESPONDENT  
MARK OVERHOLT

**INTERVENING RESPONDENT JOANNE DOVE PRISLEY'S  
MOTION FOR LEAVE TO FILE AN AMENDED MERIT BRIEF**

Now comes Intervening Respondent Joanne Dove Prisley who respectfully moves this Court for leave to file an amended merit brief for the purposes of making the following clerical corrections and changes to the Merit Brief: (1) correcting and amending the Table of Authorities, (2) correcting the Table of Contents to reflect the proper page on which the Table of Authorities commences, and (3) correcting the cover page to include Charles Sanders, Esq., Intervening Respondent proceeding *pro se* and Counsel for Intervening Respondents R.J. Lumbrezer and Roy Norman.

A memorandum supporting this motion is set forth below. The body of the Merit Brief and the Appendix, which consists of Intervening Respondent Prisley's Exhibits (Evidence), will not be changed. The proposed Amended Merit Brief has been filed contemporaneously with this Motion.

Respectfully submitted,

/s Michael M. Hollingsworth

---

Michael M. Hollingsworth (0002556)  
39 North College Street, P.O. Box 428  
Athens, Ohio 45701  
740-593-5828 (o)  
mike@mmhlaw.us

*Counsel for Intervening Respondent  
Joanne Dove Prisley*

## MEMORANDUM

Intervening Respondent Prisley's Merit Brief was filed at approximately 4:42 P.M. on September 4, 2015, which was Respondents' deadline for filing. Due to the large number of citations in the Brief and the short expedited three-day period for preparing and filing the brief, counsel did not finish reviewing and correcting the Table of Authorities before the Merit Brief was filed. Pursuant to S.Ct.Prac.R. 12.08(A)(2)(b), the substantive portion of the Merit Brief and Intervening Respondent Prisley's Evidence, consisting of her Exhibits I through XII, were filed on time. She has not made any changes to the Merit Brief proper or the Evidence.

The proposed changes are clerical in nature and are limited to the following: (1) correcting and amending the Table of Authorities, (2) correcting the Table of Contents to reflect the proper page on which the Table of Authorities commences, and (3) correcting the cover page to include Charles Sanders, Esq., Intervening Respondent proceeding *pro se* and Counsel for Intervening Respondents R.J. Lumbrezer and Roy Norman.

Intervening Respondent Prisley respectfully requests that this Court grant her Motion for Leave to File an Amended Merit Brief.

Respectfully submitted,

/s Michael M. Hollingsworth

---

Michael M. Hollingsworth (0002556)  
39 North College Street, P.O. Box 428  
Athens, Ohio 45701  
740-593-5828 (o)  
mike@mmhlaw.us

*Counsel for Intervening Respondent  
Joanne Dove Prisley*

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Intervening Respondent Joanne Dove Prisley's Motion for Leave to File Amended Merit Brief* were served this 7<sup>th</sup> day of September, 2015, by electronic email delivery on the following:

MIKE DEWINE, OHIO ATTORNEY GENERAL

Kurt A. Tunnell (0038569)  
Anne Marie Sferra (0030855)  
Counsel of Record  
Brickler & Eckler LLP  
100 South Third Street  
Columbus, Ohio 43215  
(614) 728-4948 (o) (614) 227-2390 (f)  
ktunnell@bricker.com asferra@bricker.com

COUNSEL FOR RESPONDENT JON HUSTED,  
SECRETARY OF STATE OF OHIO

Charles Saunders (0090266)  
6772 US Highway 20  
Metamora, Ohio 43540-9739  
(419) 280-0731 (o) (877) 472-1863 (f)  
saunderslitigation@gmail.com

INTERVENING RESPONDENT CHARLES  
SAUNDERS PROCEEDING *PRO SE* AND  
COUNSEL FOR INTERVENING RESPONDENTS  
R.J. LUMBREZER, AND ROY NORMAN

James Kinsman (0090038)  
P.O. Box 24313  
Cincinnati, Ohio 45224  
(513) 549-3369 (o)  
james@jkinsmanlaw.com

Terry J. Lodge (0029271)  
316 N. Michigan St., Suite 520  
Toledo, OH 43604-5627  
419-205-7084 (o)  
lodgelaw@yahoo.com

CO-COUNSEL FOR RELATORS

Curt C. Hartman (0064242)  
7394 Ridgepoint Drive, Suite 8  
Cincinnati, Ohio 45230  
(513) 379-2923 (o)  
hartmanlawfirm@fuse.net

COUNSEL FOR INTERVENING RESPONDENT  
MARK OVERHOLT

Respectfully submitted,

/s Michael M. Hollingsworth

---

Michael M. Hollingsworth (0002556)