

IN THE SUPREME COURT OF OHIO

The Ohio Manufacturers' Association, :
et al., :
 : **Case No. 2016-0313**
 :
Relators, :
 :
 :
 :
v. : **Original Action Under Article II,**
 : **Section 1g of the Ohio Constitution**
 :
 :
Ohioians for Drug Price Relief Act, :
et al., :
 :
 :
Respondents. :

**RELATORS' MOTION REQUESTING SERVICE
ON RESPONDENT LATONYA THURMAN AT NEW ADDRESS**

Kurtis A. Tunnell (0038569)
Counsel of Record
Anne Marie Sferra (0030855)
Nelson M. Reid (0068434)
James P. Schuck (0072356)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215
(614) 227-2300 (Telephone)
(614) 227-2390 (Facsimile)
ktunnell@bricker.com
asferra@bricker.com
nreid@bricker.com
jschuck@bricker.com

Counsel for Relators

MICHAEL DeWINE (0009181)
Ohio Attorney General

Steve T. Voigt (0092879)
Senior Assistant Attorney General
Brodi J. Conover (0092082)
Assistant Attorney General
Constitutional Offices Section
30 E. Broad Street, 16th Floor
Columbus, Ohio 43215
(614) 466-2872 (Telephone)
(614) 728-7592 (Facsimile)
steven.voigt@ohioattorneygeneral.gov
brodi.conover@ohioattorneygeneral.gov

*Counsel for Respondent,
Ohio Secretary of State Jon Husted*

Donald J. McTigue (0022849)
MCTIGUE & COLOMBO LLC
545 East Town Street
Columbus, Ohio 43215
(614) 263-7000 (Telephone)
(614) 263-7078 (Facsimile)
dmctigue@electionlawgroup.com

*Counsel for Respondents,
William S. Booth, Daniel L. Darland,
Tracy L. Jones, and Latonya D. Thurman*

Relators hereby move the Court to instruct the clerk to serve Respondent Latonya Thurman with a summons and copy of the challenge (per this Court's order of March 2, 2016) at 611 Meadow Green Circle, Apt. B, Gahanna, Ohio 43230. This is Ms. Thurman's new address which was unknown to Relators at the time the challenge was filed. A Memorandum in Support of this Motion is appended hereto.

Respectfully submitted,

/s/ Anne Marie Sferra
Kurtis A. Tunnell (0038569)
Counsel of Record
Anne Marie Sferra (0030855)
Nelson M. Reid (0068434)
James P. Schuck (0072356)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215
(614) 227-2300 (Telephone)
(614) 227-2390 (Facsimile)
ktunnell@bricker.com
asferra@bricker.com
nreid@bricker.com
jschuck@bricker.com

Counsel for Relators

MEMORANDUM IN SUPPORT

On February 29, 2016, Relators filed a challenge to the Ohio Drug Price Relief Act initiative petition, under Article II, Section 1g of the Ohio Constitution, with the Court. Pursuant to S.Ct.Prac.R. 14.01(F), Relators attempted to serve Respondent Latonya D. Thurman with the filings in this matter. On February 29, 2016, Relators sent a process server to 2618 North Cassidy Avenue, Columbus, Ohio to serve Ms. Thurman. This was the address listed for Ms. Thurman in the mandamus action she filed in this Court, on January 6, 2016, designated as *State ex rel. Jones v. Husted* (Case No. 2016-0020). Upon attempting to serve Ms. Thurman at the Cassidy Avenue address, the process server was informed that Ms. Thurman no longer lives at that address and that she had moved last year.

Relators sought Ms. Thurman's new address from Donald McTigue (her counsel) and were informed that Ms. Thurman's new address is: 611 Meadow Green Circle, Apt. B, Gahanna, Ohio 43230.

Because the Court has instructed the clerk to serve a summons and copy of the challenge on all Respondents, Relators move the Court to instruct the clerk to re-serve Ms. Thurman at her new address – 611 Meadow Green Circle, Apt. B, Gahanna, Ohio 43230.

Respectfully submitted,

/s/ Anne Marie Sferra
Kurtis A. Tunnell (0038569)
Counsel of Record
Anne Marie Sferra (0030855)
Nelson M. Reid (0068434)
James P. Schuck (0072356)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215
(614) 227-2300 (Telephone)
(614) 227-2390 (Facsimile)
ktunnell@bricker.com
asferra@bricker.com
nreid@bricker.com
jschuck@bricker.com

Counsel for Relators

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via email on March 3, 2016 upon:

Steve T. Voigt,
Senior Assistant Attorney General
Brodi J. Conover,
Assistant Attorney General
Constitutional Offices Section
30 E. Broad Street, 16th Floor
Columbus, Ohio 43215
Email: steven.voigt@ohioattorneygeneral.gov
brodi.conover@ohioattorneygeneral.gov

Counsel for Respondent, Ohio Secretary of State, Jon Husted

Donald J. McTigue
McTigue & Colombo LLC
545 East Town Street
Columbus, Ohio 43215
Email: dmctigue@electionlawgroup.com

*Counsel for Respondents,
William S. Booth, Daniel L. Darland,
Tracy L. Jones, and Latonya D. Thurman*

/s/ Anne Marie Sferra
Anne Marie Sferra (0030855)