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

**RELATORS' MOTION FOR ORDER APPOINTING COMMISSION FOR ISSUANCE
OF SUBPOENAS FOR OUT-OF-STATE DISCOVERY**

Relators The Ohio Manufacturers' Association, The Ohio Chamber of Commerce, Pharmaceutical Research and Manufacturers of America, Keith Lake, and Ryan R. Augsburger (collectively "Relators") respectfully move this Court to issue an Order directing the Office of the Clerk to issue commissions/letters rogatory to the Clerk of the Pinellas County, Florida Circuit Court, requesting and authorizing that Court to permit Relators to take discovery of a third-party witness in this proceeding.

Cody Eldred, the owner/principal of Educated Voters, provided three different addresses in connection with circulation of the Ohio Drug Price Relief Act - in Ohio, Kentucky and Florida. Relators first tried to serve him in Ohio, but the address was a vacant store front. Relators next tried to serve him in Kentucky because it adopted the Uniform Interstate Depositions and Discovery Act ("UIDDA"), thereby simplifying the process for out-of-state service (because no commission is required). But, ultimately, the county judge in Kentucky would not issue a subpoena without a commission from this Court. Florida also requires a commission from this Court to issue a subpoena.

Relators seek to take discovery from Mr. Eldred to obtain documents he has that are relevant to this action and to ask him questions concerning his and Educated Voter's involvement in the circulation of the Petition. Educated Voters circulated nearly 2300 part-petitions (which is approximately 23% of all part-petitions circulated). Upon further review, Mr. Eldred appears to reside in Pinellas County, Florida.

So that this discovery can be taken, Relators respectfully request this Court for an order appointing a representative of Richard Lee Court Reporting, registered court reporters, as commissioner authorized to take the deposition of Mr. Eldred and authorizing the issuance of a

subpoena for deposition *duces tecum* allowing Relators to take discovery from Mr. Eldred for use in this proceeding. A proposed Order Appointing Commission for the Issuance of Subpoenas for Out-of-State Discovery from Cody Eldred is attached hereto as Exhibit A for the Court's consideration and convenience.

Relators request expedited consideration of this motion in light of the briefing schedule issued on May 18, 2016 in this case.

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)

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Counsel for Relators

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via electronic mail on

May 20, 2016 upon:

MICHAEL DeWINE
Ohio Attorney General

Steven T. Voigt
Senior Assistant Attorney General
Brodi J. Conover
Assistant Attorney General
Constitutional Offices Section
30 E. Broad Street, 16th Floor
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(614) 466-2872 (Telephone)
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*Counsel for Respondent Secretary Jon
Husted*

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

EXHIBIT A

IN THE SUPREME COURT OF OHIO

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

**ORDER APPOINTING COMMISSION FOR ISSUANCE OF
SUBPOENAS FOR DISCOVERY FROM CODY ELDRED**

FROM: THE SUPREME COURT OF OHIO

TO: THE PINELLAS COUNTY CLERK OF THE CIRCUIT COURT:

Pursuant to the request of the Relators in the above-captioned action, the Supreme Court of Ohio hereby grants Relator's Motion for Order Appointing Commission for Issuance of Subpoenas for Out-Of-State Discovery, and requests that the Clerk of the Pinellas County Circuit Court issue a subpoena *duces tecum* for the taking of discovery from Cody Eldred, who is a resident of Pinellas County, Florida, to appear for, testify, and produce documents at deposition. A representative of Richard Lee Court Reporting is hereby appointed as commissioner authorized to take the deposition of Mr. Eldred in Pinellas County, Florida for the purposes as are authorized and permitted under the Ohio Rules of Civil Procedure. Said deposition shall be attended by local Florida counsel for Relators, Darren Farfante, Esq., Buchanan, Ingersoll & Rooney, PC, SunTrust Financial Centre, 401 E. Jackson Street, Suite 2400, Tampa, Florida 33602.

Mr. Eldred will be required to bring to the deposition and make available for inspection, copying, and examination those documents and things identified in the subpoenas attached hereto as Exhibits 1 and 2.

You are respectfully requested, and are hereby expressly authorized, to subpoena Mr. Eldred in accordance with the provision of the Florida Rules of Civil Procedure and applicable statutes and rules in and for the State of Florida.

DATED: _____

Clerk of the Supreme Court of Ohio

EXHIBIT 1

IN THE SUPREME COURT OF OHIO
Subpoena for Deposition

The Ohio Manufacturers' Association, et al.
Relators

Case No. 2016-0313

v.

Ohioans for Drug Price Relief Act, et al.
Respondents.

The State of Ohio
Franklin County, ss

To: Attorney Process Server _____ Sheriff of _____ County, OH

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NAMED PERSON, to wit:

Person Business

<u>Eldred</u>	<u>3011 39th Avenue, N.</u>
Last Name/Business Name	Street Address
<u>Cody</u>	_____
First Name	Address Line 2
_____	_____
_____	Address Line 3
_____	<u>St. Petersburg</u>
_____	City
_____	<u>Florida</u>
_____	State
_____	<u>33714</u>
_____	Zip Code

To be and appear at Richard Lee Reporting, 111 2nd Avenue, N.E., St. Petersburg, FL 33701 on the 6th day of June, 2016 at 10:00 A.M.

- Attend and give testimony at a deposition on the date, time, and at the place specified above.
- Attend and produce _____ at a deposition on the date, time, and at the place specified above.
- Produce and permit inspection and copying on the date and at the time and place specified above, of any designated documents or electronically stored information that are in your possession, custody, or control.
- Produce and permit inspection and copying, testing, or sampling on the date and at the time and place specified above, of any tangible things that are in your possession, custody, or control.

<u>Anne Marie Sferra</u>	<u>0030855</u>	<u>(614) 227-2300</u>	<u>Atty. for Relators</u>
Attorney Name	Supreme Ct No.	Phone	

Sheriff's Fees I received this subpoena on the ____ day of _____, 2016, and served the party by _____ on the ____ day of _____, 2016.

Service _____ I was unable to complete service for the following reason: _____

Mileage _____

Copy _____

Total _____

NOTE: READ ALL INFORMATION ON THE SECOND PAGE OF THIS SUBPOENA

CIVIL RULE 45(C) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

(1) A PARTY OR AN ATTORNEY RESPONSIBLE FOR THE ISSUANCE AND SERVICE OF A SUBPOENA SHALL TAKE REASONABLE STEPS TO AVOID IMPOSING UNDUE BURDEN OR EXPENSE ON A PERSON SUBJECT TO THAT SUBPOENA.

(2) (a) A PERSON COMMANDED TO PRODUCE UNDER DIVISIONS (A)(1)(B)(II), (III), (IV), OR (V) OF THIS RULE NEED NOT APPEAR IN PERSON AT THE PLACE OF PRODUCTION OR INSPECTION UNLESS COMMANDED TO ATTEND AND GIVE TESTIMONY AT A DEPOSITION, HEARING, OR TRIAL.

(b) SUBJECT TO DIVISION (D)(2) OF THIS RULE, A PERSON COMMANDED TO PRODUCE UNDER DIVISIONS (A)(1)(B)(II), (III), (IV), OR (V) OF THIS RULE MAY, WITHIN FOURTEEN DAYS AFTER SERVICE OF THE SUBPOENA OR BEFORE THE TIME SPECIFIED FOR COMPLIANCE IF SUCH TIME IS LESS THAN FOURTEEN DAYS AFTER SERVICE, SERVE UPON THE PARTY OR ATTORNEY DESIGNATED IN THE SUBPOENA WRITTEN OBJECTIONS TO PRODUCTION. IF OBJECTION IS MADE, THE PARTY SERVING THE SUBPOENA SHALL NOT BE ENTITLED TO PRODUCTION EXCEPT PURSUANT TO AN ORDER OF THE COURT BY WHICH THE SUBPOENA WAS ISSUED. IF OBJECTION HAS BEEN MADE, THE PARTY SERVING THE SUBPOENA, UPON NOTICE TO THE PERSON COMMANDED TO PRODUCE, MAY MOVE AT ANY TIME FOR AN ORDER TO COMPEL THE PRODUCTION. AN ORDER TO COMPEL PRODUCTION SHALL PROTECT ANY PERSON WHO IS NOT A PARTY OR AN OFFICER OF A PARTY FROM SIGNIFICANT EXPENSE RESULTING FROM THE PRODUCTION COMMANDED.

(3) ON TIMELY MOTION, THE COURT FROM WHICH THE SUBPOENA WAS ISSUED SHALL QUASH OR MODIFY THE SUBPOENA, OR ORDER APPEARANCE OR PRODUCTION ONLY UNDER SPECIFIED CONDITIONS, IF THE SUBPOENA DOES ANY OF THE FOLLOWING:

(a) FAILS TO ALLOW REASONABLE TIME TO COMPLY;

(b) REQUIRES DISCLOSURE OF PRIVILEGED OR OTHERWISE PROTECTED MATTER AND NO EXCEPTION OR WAIVER APPLIES;

(c) REQUIRES DISCLOSURE OF A FACT KNOWN OR OPINION HELD BY AN EXPERT NOT RETAINED OR SPECIALLY EMPLOYED BY ANY PARTY IN ANTICIPATION OF LITIGATION OR PREPARATION FOR TRIAL AS DESCRIBED BY CIV. R. 26(B)(4), IF THE FACT OR OPINION DOES NOT DESCRIBE SPECIFIC EVENTS OR OCCURRENCES IN DISPUTE AND RESULTS FROM STUDY BY THAT EXPERT THAT WAS NOT MADE AT THE REQUEST OF ANY PARTY;

(d) SUBJECTS A PERSON TO UNDUE BURDEN.

(4) BEFORE FILING A MOTION PURSUANT TO DIVISION (C)(3)(d) OF THIS RULE, A PERSON RESISTING DISCOVERY UNDER THIS RULE SHALL ATTEMPT TO RESOLVE ANY CLAIM OF UNDUE BURDEN THROUGH DISCUSSIONS WITH THE ISSUING ATTORNEY. A MOTION FILED PURSUANT TO DIVISION (C)(3)(d) OF THIS RULE SHALL BE SUPPORTED BY AN AFFIDAVIT OF THE SUBPOENAED PERSON OR A CERTIFICATE OF THAT PERSON'S ATTORNEY OF THE EFFORTS MADE TO RESOLVE ANY CLAIM OF UNDUE BURDEN.

(5) IF A MOTION IS MADE UNDER DIVISION (C)(3)(c) OR (C)(3)(d) OF THIS RULE, THE COURT SHALL QUASH OR MODIFY THE SUBPOENA UNLESS THE PARTY IN WHOSE BEHALF THE SUBPOENA IS ISSUED SHOWS A SUBSTANTIAL NEED FOR THE TESTIMONY OR MATERIAL THAT CANNOT BE OTHERWISE MET WITHOUT UNDUE HARDSHIP AND ASSURES THAT THE PERSON TO WHOM THE SUBPOENA IS ADDRESSED WILL BE REASONABLY COMPENSATED.

CIVIL RULE 45 (D) DUTIES IN RESPONDING TO SUBPOENA.

(1) A PERSON RESPONDING TO A SUBPOENA TO PRODUCE DOCUMENTS SHALL, AT THE PERSON'S OPTION, PRODUCE THEM AS THEY ARE KEPT IN THE USUAL COURSE OF BUSINESS OR ORGANIZED AND LABELED TO CORRESPOND WITH THE CATEGORIES IN THE SUBPOENA. A PERSON PRODUCING DOCUMENTS OR ELECTRONICALLY STORED INFORMATION PURSUANT TO A SUBPOENA FOR THEM SHALL PERMIT THEIR INSPECTION AND COPYING BY ALL PARTIES PRESENT AT THE TIME AND PLACE SET IN THE SUBPOENA FOR INSPECTION AND COPYING.

(2) IF A REQUEST DOES NOT SPECIFY THE FORM OR FORMS FOR PRODUCING ELECTRONICALLY STORED INFORMATION, A PERSON RESPONDING TO A SUBPOENA MAY PRODUCE THE INFORMATION IN A FORM OR FORMS IN WHICH THE INFORMATION IS ORDINARILY MAINTAINED IF THAT FORM IS REASONABLY USEABLE, OR IN ANY FORM THAT IS REASONABLY USEABLE. UNLESS ORDERED BY THE COURT OR AGREED TO BY THE PERSON SUBPOENAED, A PERSON RESPONDING TO A SUBPOENA NEED NOT PRODUCE THE SAME ELECTRONICALLY STORED INFORMATION IN MORE THAN ONE FORM.

(3) A PERSON NEED NOT PROVIDE DISCOVERY OF ELECTRONICALLY STORED INFORMATION WHEN THE PRODUCTION IMPOSES UNDUE BURDEN OR EXPENSE. ON MOTION TO COMPEL DISCOVERY OR FOR A PROTECTIVE ORDER, THE PERSON FROM WHOM ELECTRONICALLY STORED INFORMATION IS SOUGHT MUST SHOW THAT THE INFORMATION IS NOT REASONABLY ACCESSIBLE BECAUSE OF UNDUE BURDEN OR EXPENSE. IF A SHOWING OF UNDUE BURDEN OR EXPENSE IS MADE, THE COURT MAY NONETHELESS ORDER PRODUCTION OF ELECTRONICALLY STORED INFORMATION IF THE REQUESTING PARTY SHOWS GOOD CAUSE. THE COURT SHALL CONSIDER THE FACTORS IN CIV. R. 26(B)(4) WHEN DETERMINING IF GOOD CAUSE EXISTS. IN ORDERING PRODUCTION OF ELECTRONICALLY STORED INFORMATION, THE COURT MAY SPECIFY THE FORMAT, EXTENT, TIMING, ALLOCATION OF EXPENSES AND OTHER CONDITIONS FOR THE DISCOVERY OF THE ELECTRONICALLY STORED INFORMATION.

(4) WHEN INFORMATION SUBJECT TO A SUBPOENA IS WITHHELD ON A CLAIM THAT IT IS PRIVILEGED OR SUBJECT TO PROTECTION AS TRIAL PREPARATION MATERIALS, THE CLAIM SHALL BE MADE EXPRESSLY AND SHALL BE SUPPORTED BY A DESCRIPTION OF THE NATURE OF THE DOCUMENTS, COMMUNICATIONS, OR THINGS NOT PRODUCED THAT IS SUFFICIENT TO ENABLE THE DEMANDING PARTY TO CONTEST THE CLAIM.

(5) IF INFORMATION IS PRODUCED IN RESPONSE TO A SUBPOENA THAT IS SUBJECT TO A CLAIM OF PRIVILEGE OR OF PROTECTION AS TRIAL-PREPARATION MATERIAL, THE PERSON MAKING THE CLAIM MAY NOTIFY ANY PARTY THAT RECEIVED THE INFORMATION OF THE CLAIM AND THE BASIS FOR IT. AFTER BEING NOTIFIED, A RECEIVING PARTY MUST PROMPTLY RETURN, SEQUESTER, OR DESTROY THE SPECIFIED INFORMATION AND ANY COPIES WITHIN THE PARTY'S POSSESSION, CUSTODY OR CONTROL. A PARTY MAY NOT USE OR DISCLOSE THE INFORMATION UNTIL THE CLAIM IS RESOLVED. A RECEIVING PARTY MAY PROMPTLY PRESENT THE INFORMATION TO THE COURT UNDER SEAL FOR A DETERMINATION OF THE CLAIM OF PRIVILEGE OR OF PROTECTION AS TRIAL-PREPARATION MATERIAL. IF THE RECEIVING PARTY DISCLOSED THE INFORMATION BEFORE BEING NOTIFIED, IT MUST TAKE REASONABLE STEPS TO RETRIEVE IT. THE PERSON WHO PRODUCED THE INFORMATION MUST PRESERVE THE INFORMATION UNTIL THE CLAIM IS RESOLVED.

EXHIBIT 2

IN THE SUPREME COURT OF OHIO
Subpoena for Production of Documents

The Ohio Manufacturers' Association, et al.
Relators

Case No. 2016-0313

v.

Ohioans for Drug Price Relief Act, et al.
Respondents.

The State of Ohio
Franklin County, ss

To: Attorney Process Server _____ Sheriff of _____ County, OH

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NAMED PERSON, to wit:

Person Business

<u>Eldred</u>		<u>3011 39th Avenue, N.</u>
Last Name/Business Name		Street Address
<u>Cody</u>		_____
First Name	Mid. Init.	Designation
		Address Line 2

		Address Line 3
		<u>St. Petersburg</u>
		City
		<u>Florida</u>
		State
		<u>33714</u>
		Zip Code

To produce documents to Darren Farfante at Buchanan Ingersoll Rooney P.C., 401 E. Jackson Street, Ste. 2400, Tampa, Florida 33602 on the 1st day of June, 2016.

- Attend and give testimony at a deposition on the date, time, and at the place specified above.
- Produce and permit inspection and copying on the date and at the time and place specified above, of any designated documents or electronically stored information that are in your possession, custody, or control as described in Exhibit A attached hereto.
- Produce and permit inspection and copying, testing, or sampling on the date and at the time and place specified above, of any tangible things that are in your possession, custody, or control.

<u>Anne Marie Sferra</u>	<u>0030855</u>	<u>(614) 227-2300</u>	<u>Atty. for Relators</u>
Attorney Name	Supreme Ct No.	Phone	

Sheriff's Fees I received this subpoena on the ____ day of _____, 2016, and served the party by _____ on the ____ day of _____, 2016.

I was unable to complete service for the following reason: _____

Service _____
Mileage _____
Copy _____
Total _____

NOTE: READ ALL INFORMATION ON THE SECOND PAGE OF THIS SUBPOENA

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EXHIBIT A

DEFINITIONS AND INSTRUCTIONS

- A. The following terms shall have the meanings indicated below:
- (1) The term “Respondents” shall mean William S. Booth, Daniel L. Darland, Tracy L. Jones, and Latonya D. Thurman, individually and as the committee supporting the Ohio Drug Price Relief Act, and their present and former agents, assigns, employees, partners, successors, predecessors, associates, personnel, attorneys, and other persons or entities acting or purporting to act on their behalf.
 - (2) The term “Petition” shall mean the initiative petition filed with the Ohio Secretary of State on December 22, 2015 proposing to enact Section 194.01 of the Ohio Revised Code, sometimes referred to as “The Ohio Drug Price Relief Act.”
 - (3) The term “person” shall mean and include natural persons, governmental entities, proprietorships, corporations, partnerships, joint ventures, and each other form of organization, entity or association.
 - (4) The term “document” is used in the broadest possible sense and shall mean, without limitation, any kind of written, printed, recorded or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts and both sides of originals, copies and drafts, and including but not limited to papers, books, letters, correspondence, telegrams, cables, telex messages, electronic messages or electronic mail (whether or not stored or recorded on-line or off-line in archive storage), financial statements, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone conversations or other conversations, or of interviews, or of conferences or other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, expense account records, lists, tabulations, summaries, sound recordings, videotapes, word processing disks and/or memory or archive systems, computer disks and/or memory or archive systems, computer printouts, data processing input and output, magnetic tapes, magnetic disks, microfilms, all other records kept by electronic, magnetic, photographic, optical or mechanical means, and things similar to any of the foregoing, however denominated.
 - (5) The term “communication” shall mean the transmission of any verbal or nonverbal, written or non-written message, information, sign, symbol, or behavior, and shall include the process by which such transmission occurs.
 - (6) The words “documents relating to” shall mean documents containing, constituting, showing, evidencing, concerning, pertaining to, relating to, and/or referring to, whether directly or indirectly.
- B. The singular number and masculine gender shall include, and be applied as, the plural or the feminine gender or neuter, and vice-versa, as the circumstances of the particular request may make appropriate.
- C. If you deem any request for documents to call for the production of privileged or otherwise nondisclosable materials and you assert such claim, please furnish a list at the time of production identifying each document so withheld together with the following information:
- (1) the reason for withholding each such document or material, stated with sufficient particularity so as to permit the Court to adjudicate the validity of the claimed privilege;

- (2) a statement of the facts constituting the basis for any claim of privilege or other ground of non-disclosure; and
- (3) a brief description of each such document or other material, including:
 - (a) the date of the document;
 - (b) the name of its author(s) or preparer(s) and an identification by employment and title of each such person(s);
 - (c) the name of each person to whom the document or other material was sent or who has had access to, or custody of, the document or other material, together with an identification of each such person(s);
 - (d) the specific request to which the document or other material is responsive; and
 - (e) in the case of any document or other material that relates in any way to a meeting or conversation, identification of such meeting or conversation and the persons attending or participating in such meeting or conversation.

D. With respect to each document request, it is requested that you identify and produce all documents that are known to you or that you can locate or discover that are in your possession, custody or control, from whatever source derived, which, directly or indirectly, relate, refer or pertain to the subject matter of the request made, including, without limitation, all such documents in the files (whether they be denominated personal, business or any other files) in your possession, custody or control or, as applicable, of your employees, agents, representatives or other persons acting on your behalf or under your control.

E. It is requested that you produce all responsive documents and other materials in an orderly manner (and with appropriate markings or other identification) so that a reasonable person will be able to identify the source of the document or other material, the file in which the document or other material was maintained, the person to whom such file belongs, and the specific request to which the document or other material is responsive.

DOCUMENTS TO BE PRODUCED

1. Please produce all communications and documents relating in any way thereto between you and any person that you utilized to circulate the Petition (including without limitation any handouts, manuals, training, and/or instructions).
2. Please produce all communications and documents relating in any way thereto between you and Respondents (including without limitation any handouts, manuals, training, and/or instructions).
3. Please produce all communications and documents relating in any way thereto between you and any of the following persons who filed a Form 15 (“Statement of Receiving or Providing Compensation for Circulating a Statewide Petition”) with the Ohio Secretary of State in regard to the Petition: PCI Consultants, Inc., Angelo Paparella, DRW Campaigns LLC, Dustin Wefel, Elite Campaigns, Inc., Eric Tincher, Ohio Petitioning Partners LLC, Pamela Lauter, Ballot Access LLC, John Michael, Educated Voters, Cody Eldred, Elizabeth Page, Kelvin Moore, David Saddler, and/or Xavier Malagon (including without limitation any handouts, manuals, training, and/or instructions).
4. Please produce all contracts and agreements, and documents relating in any way thereto, between you and any person that you utilized to circulate the Petition.
5. Please produce all contracts and agreements, and documents relating in any way thereto, between you and Respondents.
6. Excluding part-petitions of the Petition, please produce all documents relating to the permanent residence address of Fifi Harper.
7. Excluding part-petitions of the Petition, please produce all documents relating to the permanent residence address of Roy Jackson.
8. Excluding part-petitions of the Petition, please produce all documents relating to the permanent residence address of Kelvin Moore.
9. Excluding part-petitions of the Petition, please produce all documents relating to the permanent residence address of Kacey Veliquette.
10. Excluding part-petitions of the Petition, please produce all documents relating to the alteration of, or striking of names on, any part-petition of the Petition prior to submission to the Ohio Secretary of State by a person who was not a signer of the part-petition, an attorney in fact for disabled voters acting pursuant to R.C. 3501.382, or the circulator of the part-petition.
11. Please produce any policies and/or procedures and documents relating in any way thereto relating to the alteration of, or striking of names on, part-petitions of petitions circulated by you or persons employed by you.

12. Please produce all documents relating in any way to actions you undertook to ensure that the persons that you utilized to circulate the Petition were knowledgeable of and would comply with Ohio election law.
13. Please produce all documents relating in any way to actions you undertook to ensure that no person that circulated the Petition was ineligible to do so under Ohio election law.
14. Excluding part-petitions of the Petition, please produce all documents relating to the failure of any circulator of a part-petition to attest to the correct number of signatures that appeared on such part-petition.
15. Excluding part-petitions of the Petition, please produce all documents relating to the refusal of any circulator of a part-petition to attest to the incorrect number of signatures that appeared on such part-petition.
16. Please produce any policies and/or procedures and documents relating in any way thereto relating to the attestation of the number of signatures on an individual part-petition of petitions circulated by you or persons employed by you.
17. Please produce all documents or communications with any circulator of part-petitions of the Petition who refused or objected to placing a false attestation of the number of signatures on an individual part-petition of petitions circulated by such circulator.
18. Please produce all documents or communications with any of the following circulators of part-petitions of the Petition: Adrienne Raishawn Collins and/or Kevin Hawkins.
19. Please produce all documents relating to or reflecting criminal background checks you performed or requested on circulators of part-petitions of the Petition prior to the date they began circulating part-petitions.
20. Please produce all documents relating to or reflecting criminal background checks you performed or requested on circulators of part-petitions of the Petition at any time.
21. Please produce all IRS forms (including but not limited to W-9, W-2, or 1099 forms) related to any of the following circulators of part-petitions of the Petition: Michael Mayo, Walter Searcy, Stephanie Cole, Sean Thomas, and/or Antoine Woods.
22. Please produce documents showing the date of birth and/or social security number for the following circulators of part-petitions of the Petition: Michael Mayo, Walter Searcy, Stephanie Cole, Sean Thomas, and/or Antoine Woods.
23. Please produce the employment application and personnel file (or commensurate file) for the following circulators of part-petitions of the Petition: Fifi Harper, Roy Jackson, Kelvin Moore, and/or Kacey Veliquette.
24. Please produce all IRS forms (including but not limited to W-9, W-2, or 1099 forms) related to any of the following circulators of part-petitions of the Petition: Fifi Harper, Roy Jackson, Kelvin Moore, and/or Kacey Veliquette.

25. Please produce documents showing the date of birth and/or social security number for the following circulators of part-petitions of the Petition: Fifi Harper, Roy Jackson, Kelvin Moore, and/or Kacey Veliquette.
26. Please produce the employment application and personnel file (or commensurate file) for the following circulators of part-petitions of the Petition: Fifi Harper, Roy Jackson, Kelvin Moore, and/or Kacey Veliquette.