

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. :

**OHIO SECRETARY OF STATE'S RESPONSE
TO RELATORS' MOTION FOR ORDER APPOINTING COMMISSION FOR
ISSUANCE OF SUBPOENAS FOR OUT-OF-STATE DISCOVERY**

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Pursuant to this Court's May 24, 2016 order, Respondent Ohio Secretary of State Jon Husted hereby responds to Relators' motion for order appointing commission for issuance of subpoenas for out-of-state discovery. With respect to the Proposed Initiative, the Secretary has acted at all times pursuant to and in compliance with the Ohio Constitution and Ohio law. The Secretary, however, supports any decisions by this Court to fully develop the factual record before the Court. The Secretary believes that the development of the factual and evidentiary record will help the Court understand the issues before it. The appointment of a commission for purposes of issuing out-of-state subpoenas furthers this objective. With respect to Relators' motion, because it does not relate to any actions of the Secretary, a substantive response by the Secretary is not needed.

Respectfully submitted,

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s/ Steven T. Voigt

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served by first class mail via the U.S. Postal Service on May 25, 2016, upon the following:

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