

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 MEMORANDUM IN RESPONSE TO
RELATORS' MOTION FOR RECONSIDERATION

Pursuant to S.Ct.Prac.R. 18.03, Respondent Ohio Secretary of State Jon Husted hereby responds to the Relators' motion for reconsideration.

As the Secretary stated in response to the Petition Committee's motion for reconsideration, there has been a final decision on the merits. *OMA* contemplated numerous motions and filings, months of discovery, and merits briefs from each party. This Court had the facts, the issues, and the arguments before it. The Court provided the Petition Committee Respondents with straightforward directions to gather additional signatures and submit their Proposed Initiative. And, indeed, the Petition Committee has complied with those directions by filing additional signatures.

The Secretary additionally responds to Relators' motion only to emphasize the administrative importance of having the ability to contact a circulator using a valid address.

Revised Code 3501.38(E)(1)'s requirement that the circulator's statement contain the "circulator's permanent residence" has proven helpful in prior investigations.

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 September 2, 2016, upon the following:

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