

EXHIBIT W

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OHIO STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, et al.,	:	
	:	
Plaintiffs,	:	Case No. 2:14-cv-00404
	:	
v.	:	Judge Peter C. Economus
	:	
JON HUSTED, et al.,	:	Magistrate Judge
	:	Norah McCann King
Defendants.	:	
	:	

**PLAINTIFF OHIO STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF COLORED PEOPLE’S OBJECTIONS AND RESPONSES
TO DEFENDANT HUSTED’S FIRST SET OF INTERROGATORIES**

Plaintiff Ohio State Conference of the National Association for the Advancement of Colored People serves these Objections and Responses to Defendant Husted’s First Set of Interrogatories under Federal Rule of Civil Procedure 33.

GENERAL OBJECTIONS

1. Plaintiff objects to each interrogatory insofar as it seeks information not in the possession, custody, or control of the Plaintiff.
2. Plaintiff objects to each interrogatory insofar as it seeks information that was prepared for or in anticipation of litigation, constitutes attorney work product, contains attorney-client communications, or is otherwise privileged.
3. Plaintiff objects to each interrogatory insofar as it seeks information that is publicly available or otherwise equally available and/or uniquely or equally available from third parties.
4. Plaintiff objects to each interrogatory insofar as it is overly broad and unduly burdensome.
5. Plaintiff objects to each interrogatory insofar as it seeks information that is not relevant to the subject matter of this litigation or reasonably calculated to lead to the discovery of admissible evidence.
6. These responses and objections are made to the best of Plaintiff’s present knowledge, information and belief, and are made without waiving any further objections to, or admitting the relevancy or materiality of, any of the information requested.

Identify with specificity each and every instance where You claim the legislature purportedly attempted to silence debate or discussion of the effect of SB 238.

RESPONSE:

In addition to the foregoing General Objections, Plaintiff objects to supplying “contradicting” facts to the extent that this calls for attorney work product.

Subject to, and without waiving the foregoing objections, Plaintiff responds by specifying the following records:

- Ohio House of Representatives Journal at 2-3, 5-6 (Feb. 24, 2014), *available at* <http://www.legislature.state.oh.us/journaltext130/HJ-02-24-14.pdf>.
- Gongwer News Service, Vol. 83, Rpt. 35, Article 3 (Feb. 21, 2014).
- Gongwer News Service, Vol. 83, Rpt. 35, Article 1 (Feb. 19, 2014).

INTERROGATORY NO. 22:

Identify with specificity the relief You seek in this matter. Among other things, identify with specificity the pre-election voting dates, times, polling place organization, and overall election voting structure that You desire to see implemented and identify how this differs from the laws currently in place.

RESPONSE:

In addition to the foregoing General Objections, Plaintiff objects to the Defendant’s request to identify information related to “polling place organization” and “overall election voting structure” as being irrelevant.

Subject to, and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff requests that the Court require Defendants to restore the eliminated week of same day voting and to set uniform and suitable hours that include multiple Sundays and weekday evening hours.

INTERROGATORY NO. 23:

Identify all facts and support for your claim in Paragraph 64 of Your Complaint about “indifference to the importance of ensuring that indigent voters are not disenfranchised.”

RESPONSE:

In addition to the foregoing General Objections, Plaintiff objects specifically to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, and ambiguous. Plaintiff objects to the Interrogatory insofar as it seeks “*all facts and support*” for the claim that that “Defendant Husted has expressed indifference to the importance of ensuring that indigent

voters are not disenfranchised,” and insofar as Defendant does not reasonably limit the scope of the inquiry. Additionally, Plaintiff objects to supplying “contradicting” facts to the extent that this calls for attorney work product.

Subject to, and without waiving the foregoing objections, Plaintiff responds by specifying the following records:

- *Ne. Ohio Coal. for the Homless v. Husted*, No. 2:06-CV-896, 2013 WL 4008758 (S.D. Ohio Aug. 5, 2013).
- *SEIU v. Husted*, Nos. 2:12-cv-562, 2:06-cv-896, 2012 WL 5497757 (S.D. Ohio Nov. 13, 2012).

Dated: July 12, 2014

Respectfully submitted,

/s/ Freda J. Levenson
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* Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing *PLAINTIFF OHIO STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE'S
OBJECTIONS AND RESPONSES TO DEFENDANT HUSTED'S FIRST SET OF
INTERROGATORIES* was served on all Counsel of Record via e-mail this 12th day of July,
2014.

/s/ Sean J. Young
Sean J. Young
Attorney for Plaintiff