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J. Kenneth Blackwell
Secretary of State

IN THE COURT OF COMMON PLEAS
OF FRANKLIN COUNTY

Ohio Democratic Party, et al.,

Relators,

v.

J. Kenneth Blackwell
Secretary, State of Ohio,

Respondent.

) Case No. _____
)
)

) Hon. _____
)

) MOTION FOR EXPEDITED
) HEARING
)

) Richard M. Kerger (0015864)
) Kimberly A. Donovan (0074726)
) Zachary M. Clark (0080450)
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)

) COUNSEL FOR RELATORS
)

Pursuant to Local Rule 37.01, Relators ask that the Court schedule this
matter for final relief within the next 30 days.

The relief sought in this proceeding is a writ of mandamus requiring the
Secretary of State to enact certain directives which are essential to assuring a fair and
honest vote in November's general elections in Ohio. Those elections will be held on
November 7, 2006. While the relief sought is focused, it will nonetheless require time

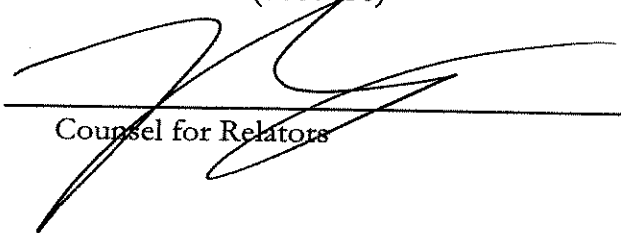
for the Secretary to issue directives and have the Board of Elections respond to them. For this case to be allowed to progress through the normal time periods established will be to assure that none of the directives are in effect for the forthcoming election.

Accordingly, Relators urge the Court to schedule this case for a prompt and expeditious hearing, suggesting that it be heard during the week of September 25, 2006.

Respectfully submitted,

RICHARD M. KERGER (0015864)
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By


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CERTIFICATE OF SERVICE

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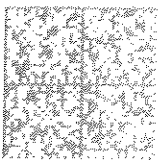
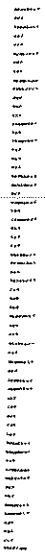
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