

IN THE SUPREME COURT OF OHIO

**THE STATE OF OHIO EX. REL.
SUMMIT COUNTY REPUBLICAN
PARTY EXECUTIVE COMMITTEE**

CASE NUMBER: 08-0478

RELATOR,

vs.

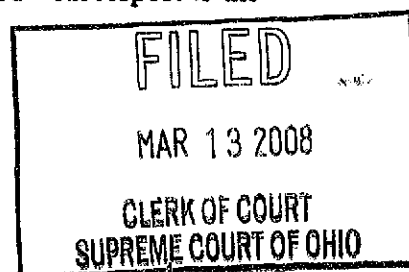
**JENNIFER BRUNNER
OHIO SECRETARY OF STATE**

RESPONDENT.

**RELATOR'S MEMORANDUM IN OPPOSITION TO
RESPONDENT'S FIRST MOTION TO SEAL**

Relator, State ex rel. Summit County Republican Party Executive Committee, hereby respectfully submits its following objections in opposition to Respondent's Motion to Seal filed on March 12, 2008 as follows:

1. The issue raised by the Respondent has already been resolved by this Court implicitly through its ruling yesterday, March 12, 2008, denying Respondent's Motion for Protective Order to preclude her video taped deposition from being taken.
2. Upon the filing of Respondent's video taped deposition with this Court, that video tape will constitute evidence in an original action and should be treated in the same way that any other such introduced evidence is treated with respect to the public's right of access thereto.



Respectfully submitted,

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CERTIFICATE OF SERVICE

Counsel for Relator has served a copy of this *Relator's Memorandum in Opposition to Respondent's First Motion to Seal* by U.S. mail postage prepaid
this 13th Day of March 2008 to:

Coglianesse, Richard (66830)
Becker, William (13476)
Brown, Amy (79650)
Chin, Pearl (78810)
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