

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

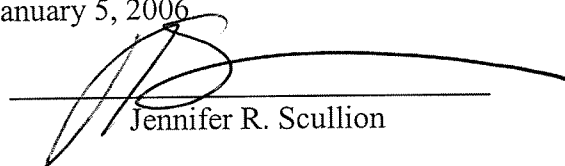
League of Women Voters of Ohio, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:05-CV-7309
)	Chief Judge Carr
J. Kenneth Blackwell, <i>et al.</i> ,)	
)	
Defendants.)	

**DECLARATION OF JENNIFER R. SCULLION
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION AND APPLICATION UNDER 28 U.S.C. § 1292(B)**

JENNIFER R. SCULLION hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am Senior Counsel at Proskauer Rose LLP, co-counsel to Plaintiffs in this action.
2. Since the November 8, 2005 election, the Boards of Elections of eighteen (18) individual counties within the geographic jurisdiction of the Northern District of Ohio have voluntarily produced or have agreed to produce or permit copying of documents responsive to Plaintiffs' subpoenas. Many of these counties voluntarily produced their documents after December 8, 2005, notwithstanding this Court's Order staying discovery.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 5, 2006



Jennifer R. Scullion