
ARNOLD & PORTER LLP

Shelby Hunt
Shelby_Hunt@aporter.com
202.942.6604
202.942.5999 Fax
555 Twelfth Street, NW
Washington, DC 20004-1206

November 22, 2005

VIA E-MAIL AND FIRST CLASS MAIL

Richard N. Coglianesi, Esq.
Deputy Attorney General
Constitutional Offices Section
30 East Broad Street, 17th Fl.
Columbus, Ohio 43215

Re: *League of Women Voters of Ohio et al. v. Blackwell et al.*

Dear Rich:

In addition to the Rule 30(b)(6) depositions that have been noticed for December 1 and 2, and the witnesses identified in Michael Geske's November 11, 2005 letter, based upon further evaluation of the discovery record, we now believe that we need to take the depositions of the eight field representatives (Jeremy Demagall, Madhu Singh, Richard Fais, Michael Claret, Andrew Shiflette, Christian Lobb, Toni Slusser, and Sarah Spence). With regard to each of these witnesses, please advise (a) whether your office represents the individual in question and (b) the witnesses' availability to be deposed prior to December 16.

We note that we have not received a response to Mr. Geske's November 11 letter requesting your confirmation that your office does, in fact, represent the identified witnesses, and if so, the dates on which you propose to make each witness available for deposition. If we do not hear from you by early next week, we will notice these depositions to ensure their testimony will be taken within the scheduling parameters established by Judge Carr.

We also note that (per Mr. Geske and my letters of November 11, 2005), we have serious questions regarding the sufficiency of the document production from most of the witnesses identified in Mr. Geske's November 11 letter. In addition to those issues, we have been unable to find in your production to date the field reports filed, if any, by Messrs. Demagall, Signh, Fais, Clarrett, Lobb, and Slusser, nor have we found any emails or any other internal communications involving these individuals. As you know, it is to everyone's benefit if we receive all responsive documents well in advance of the depositions for these individuals to minimize the likelihood that they need to be recalled.

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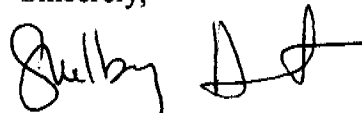
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November 22, 2005
Page 2

We look forward to receiving the balance of your document production at your earliest convenience.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Shelby Hunt", with a stylized flourish at the end.

Shelby Hunt

cc: Jon M. Greenbaum, Esq.
Benjamin J. Blustein, Esq.
Caroline S. Press, Esq.
Jennifer R. Scullion, Esq.
John A. Freedman, Esq.
Michael R. Geske, Esq.
Steven P. Collier, Esq.