

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

SERVICE EMPLOYEES	:	
INTERNATIONAL UNION, LOCAL 1199	:	Civil Action No.: C2 06 896
and THE NORTHEAST OHIO COALITION	:	
FOR THE HOMELESS,	:	JUDGE ALGENON L. MARBLEY
Plaintiffs,	:	
vs.	:	MAGISTRATE JUDGE KEMP
	:	
J. KENNETH BLACKWELL, in his official	:	
capacity as Secretary of State of Ohio,	;	
	:	
Defendant.	:	

**DEFENDANT, J. KENNETH BLACKWELL, OHIO SECRETARY OF STATE’S,
MOTION FOR EXPEDITED DISCOVERY**

Now comes Defendant, J. Kenneth Blackwell, Secretary of the State of Ohio, by and through counsel, and pursuant to Fed. R. Civ. P. 26, 30, 33, 34 and 25, respectfully requests this Honorable Court issue an Order for expedited Discovery so that the Parties may properly prepare for the hearing on the Plaintiffs’ Motion for Preliminary Injunction currently scheduled for November 1, 2006, at 9:00 a.m. Plaintiffs in this matter have similarly filed a Motion for Expedited Discovery and Defendant requests that this Court coordinate a proposed Discovery Schedule after consultation with the Parties. As of this date, Defendant has served on Plaintiffs its First Set of Combined Interrogatories and Requests for Production of Document.

WHEREFORE, Defendant, J. Kenneth Blackwell, Secretary of the State of Ohio, respectfully requests this Honorable Court grant his Motion for Expedited Discovery and enter an Order that is consistent with the request of both Parties, and to allow the Parties to prepare for the Preliminary Injunction hearing currently scheduled for November 1, 2006.

Respectfully submitted,

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Ohio Secretary of State

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon all counsel of record via the Court's electronic filing system on October 27, 2006.

/S/ Christina L. Corl

Christina L. Corl