

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION**

<b>OHIO A. PHILIP RANDOLPH INSTITUTE, <i>et al.</i></b>	:	
	:	
<b>Plaintiffs,</b>	:	<b>Case No. 2:16-cv-00303</b>
	:	
<b>v.</b>	:	<b>JUDGE GEORGE C. SMITH</b>
	:	
<b>SECRETARY OF STATE, JON HUSTED</b>	:	<b>Magistrate Judge Deavers</b>
	:	
<b>Defendant.</b>	:	

**JOINT STIPULATION AND ORDER**

Counsel for Plaintiffs and Defendants have conferred and agree that there is no need for briefing or a hearing on Plaintiffs’ request for a temporary restraining order. Defendant agrees that Defendant will not do the following prior to the earlier of: (a) this Court’s decision on Plaintiffs’ motion for a preliminary injunction or (b) July 1, 2016:

- (1) Issue or cause to issue any roll-maintenance directive that includes or requires counties in Ohio to implement the Supplemental Process or any process as described within pages two and three of Attachment “A” or to send voters SOS Form 10-S or a similar confirmation notice;
- (2) Send or cause to be sent any confirmation notices to any registered voters under the Supplemental Process or any process as described within pages two and three of Attachment “A”.
- (3) This Order does not apply to or affect any actions pursuant to the NCOA process, which is also described in Attachment “A”.

As such, there is no imminent need for a Court Order.

Plaintiffs hereby withdraw their motion for a temporary restraining order without prejudice to their right to renew it on or after June 15, 2016, should no ruling on their preliminary injunction have issued by that date. Plaintiffs maintain the preliminary injunction aspect of their motion.

The Parties have entered into this Stipulation for the sole purpose of furthering the efficient resolution of this matter. Defendant does not admit to or agree with the assertions in Plaintiffs' Complaint.

Respectfully submitted,

MIKE DEWINE  
Ohio Attorney General

s/ Naila Awan (Per Email Authorization)

NAILA AWAN, Trial Attorney (0088147)  
STUART C. NAIFEH\*  
CAMERON BELL\*  
Dēmos  
220 Fifth Ave., 2nd Flr.  
New York, NY 10001  
Telephone: 212-485-6055  
Email: nawan@demos.org  
Email: snaifeh@demos.org

FREDA J. LEVENSON (0045916)  
ACLU of Ohio  
4506 Chester Avenue  
Cleveland, Ohio 44103  
Telephone: 216-472-2220  
Email: flevenson@acluohio

DANIEL P. TOKAJI  
Cooperating Attorney for ACLU of Ohio  
The Ohio State University  
Moritz College of Law\*\*  
55 W. 12th Ave  
Columbus, OH 43210  
Telephone: 310-266-0402  
Email: dtokaji@gmail.com

RICHARD SAPHIRE (0017813)  
Cooperating Attorney for ACLU of Ohio  
University of Dayton School of Law\*\*  
300 College Park  
Dayton, Ohio 45469  
Telephone: 937-229-2820  
Email: rsaphire1@udayton.edu

s/ Steven T. Voigt

STEVEN T. VOIGT (0092879)  
Senior Assistant Attorney General  
JORDAN S. BERMAN (0093075)  
Assistant Attorney General  
Constitutional Offices Section  
30 East Broad Street, 16th Floor  
Columbus, Ohio 43215  
Tel: (614) 466-2872; Fax: (614) 728-7592  
steven.voigt@ohioattorneygeneral.gov  
jordan.berman@ohioattorneygeneral.gov

*Counsel for Defendant*  
*Secretary of State Jon Husted*

PAUL MOKE (0014099)  
Cooperating Attorney for ACLU of Ohio  
Wilmington College\*\*  
1252 Pyle Center  
Wilmington, Ohio 45177  
Telephone: 937-725-7501  
Email: paul.moke@gmail.com

**SO ORDERED.**

---

**UNITED STATES DISTRICT JUDGE**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2016 foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by e-mail or facsimile upon all parties for whom counsel has not yet entered an appearance and upon all counsel who have not entered their appearance via the electronic system.

*s/ Steven T. Voigt*

---

STEVEN T. VOIGT (0092879)  
Senior Assistant Attorney General