

IN THE SUPREME COURT OF OHIO

MOSS, <i>ET AL.</i>,	:	
	:	
CONTESTORS,	:	CASE No. 04-2088
	:	
-v-	:	ORIGINAL ACTION TO CONTEST ELECTION
	:	
BUSH, <i>ET AL.</i>,	:	
	:	
CONTESTEES.	:	

**MEMORANDUM OF UNITED STATES REPRESENTATIVE JOHN CONYERS, JR.
AS *AMICUS CURIAE* IN OPPOSITION TO MOTION OF SECRETARY OF STATE
BLACKWELL FOR SANCTIONS PURSUANT TO CIV. R. 11 AND S. CT. PRAC. R.
XIV, §5**

BENSON A. WOLMAN (0040123)
COUNSEL OF RECORD FOR AMICUS CURIAE
U.S. REPRESENTATIVE JOHN CONYERS, JR.
SUSAN B. GELLMAN (0034375)
WOLMAN & ASSOCIATES
341 S. THIRD STREET, SUITE 301
COLUMBUS, OHIO 43215-5463
TEL: 614-280-1000/FAX: 614-280-9000
COUNSEL FOR AMICUS CURIAE CONYERS

RICHARD N. COGLIANESE (0066830)
ASSISTANT ATTORNEY GENERAL
COUNSEL OF RECORD FOR SECRETARY
BLACKWELL
30 EAST BROAD STREET, 17TH FLOOR
COLUMBUS, OHIO 43215
TEL: 614-466-2872/ FAX: 614-728-7592

DAVID S. CUPPS (0017002)
COUNSEL OF RECORD FOR
CHIEF JUSTICE MOYER
VORYS SATER SEYMOUR & PEASE, LLP
P. O. BOX 1008
COLUMBUS, OHIO 43216-1008
TEL: 614-464-6318/ FAX: 614-719-4677
COUNSEL FOR CONTESTEES

CLIFFORD O. ARNEBECK, JR. (0033391)
COUNSEL OF RECORD FOR CONTESTORS
341 SOUTH 3RD STREET. SUITE 10
COLUMBUS, OHIO 43215
TEL: 614-224-8771/ FAX: 614-224-8082

ROBERT J. FITRAKIS (0076796)
341 SOUTH 3RD STREET, SUITE 10
COLUMBUS, OHIO 43215
TEL: 614-253-2571/ FAX: 614-224-8082

SUSAN TRUITT (0018766)
341 SOUTH 3RD STREET, SUITE 10
COLUMBUS, OHIO 43215
TEL: 614-224-8771/ FAX: 614-224-8082

PETER PECKARSKY (PRO HAC VICE)
341 SOUTH 3RD STREET, SUITE 10
COLUMBUS, OHIO 43215
TEL: 614-224-8771/FAX: 614-224-8082
COUNSEL FOR CONTESTORS