

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

OHIO DEMOCRATIC PARTY,

Plaintiff,

v.

OHIO REPUBLICAN PARTY, DONALD J.  
TRUMP FOR PRESIDENT, INC., ROGER J.  
STONE, JR., and STOP THE STEAL INC.,

Defendants.

Civil Action No. 1:16-cv-02645-JG

JUDGE JAMES S. GWIN

MAGISTRATE JUDGE THOMAS M.  
PARKER

**PLAINTIFF’S MOTION FOR VOLUNTARY DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(a)(2), Plaintiff Ohio Democratic Party respectfully requests that the Court dismiss this action because the claims set forth in the Complaint , which are for injunctive relief, are in connection with the 2016 Election, which took place on November 8, 2016. As the 2016 Election has already occurred, the claims for injunctive relief set forth in the Complaint are rendered moot and should not be further litigated.

On November 9, 2016, via telephone, Plaintiff’s counsel spoke with counsel for Defendant Donald J. Trump for President, Inc. (the “Trump Campaign”), who represented the Trump Campaign was unopposed to this Motion. Also on November 9, 2016, Plaintiff’s counsel contacted counsel for Defendant The Ohio Republican Party (the “ORP”) via telephone, but counsel for the ORP was unable to advise if the ORP was unopposed to this Motion.

A proposed Order dismissing this action is attached hereto.

November 9, 2016

Respectfully submitted,

/s/ Steven S. Kaufman

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2016, a copy of the foregoing Motion for Voluntary Dismissal was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served in accordance with the Federal Rules of Civil Procedure. Parties may access this filing through the Court's system.

/s/ Steven S. Kaufman  
*One of the Attorneys for Plaintiff*  
*Ohio Democratic Party*