

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DEREK HAMILTON, et al.	:	
	:	
Plaintiffs,	:	Case No. 1:08-CV-02546
v.	:	
	:	Judge Nugent
ASHLAND COUNTY	:	
BOARD OF ELECTIONS, et al.	:	Magistrate Judge _____
	:	
Defendants	:	
	:	

**MOTION FOR ORDER TO CONVEY**

Now come Defendants Ashland County Board of Elections, Dennis Ragle, Bonnie Manos, George Bringman, and David Samsel and respectfully request that this Honorable Court order the Ohio Department of Youth Services to convey Plaintiffs in this action to the hearing scheduled for October 31, 2008.

Respectfully submitted,

RAMONA FRANCESCONI ROGERS (0031149)  
Prosecuting Attorney

/s/ Ramona Francesconi Rogers

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Attorneys for Defendants Ashland Co.  
Board of Elections, Dennis Ragle, Bonnie  
Manos, George Bringman, and David Samsel  
Assistant Prosecuting Attorneys  
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**MEMORANDUM IN SUPPORT**

Plaintiffs attached factual affidavits in support of their Motion for a Temporary Restraining Order. Defendants have a substantial need to inquire upon Plaintiffs as to the assertions contained in those affidavits and the circumstances of their placement in the Ohio Department of Youth Services. The Ohio Department of Youth Services has indicated that they will not transfer Plaintiffs in the absence of a court order.

For the foregoing reasons, Defendants respectfully request that this Honorable Court order the Ohio Department of Youth Services to convey Plaintiffs to the hearing scheduled for October 31, 2008.

Respectfully submitted,

RAMONA FRANCESCONI ROGERS (0031149)  
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