

SUPREME COURT OF OHIO

Ohio High Sch. Athletic Assn. v. Ruehlman

106 N.E.3d 63 (Ohio 2018) · Decided August 27, 2018

SUMMARY

The Ohio Supreme Court addressed an emergency-stay motion and request for an expedited alternative writ of prohibition concerning a trial court's temporary restraining order against enforcement of the Ohio High School Athletic Association's Competitive Balance Rules. The majority granted the motion and stayed enforcement of the restraining order pending resolution, while dissenting opinions would have denied or limited the stay and, in one instance, granted a peremptory writ.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	O'Donnell, J.
JURISDICTION	Ohio
DECIDED	August 27, 2018
DISPOSITION	writ_granted
PROCEDURAL POSTURE	In an original action for prohibition, the relator moved for an emergency stay and an expedited alternative writ challenging a trial court's temporary restraining order concerning the Ohio High School Athletic Association's Competitive Balance Rules.
PRECEDENTIAL VALUE	Dissenting opinion; nonbinding
PARTIES	Ohio High School Athletic Association v. Ruehlman

TOPICS

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QUESTIONS PRESENTED

1. Whether the Supreme Court of Ohio should grant an emergency stay of the trial court's temporary restraining order.

2. Whether the Supreme Court of Ohio should issue an expedited alternative writ of prohibition when the trial court had already found that the arbitrariness exception to deference toward the Ohio High School Athletic Association applied.

HOLDINGS

1. In the dissent's view, the alternative writ should be denied because the trial court's finding that the arbitrariness exception applied established jurisdiction in the circumstances of the case.

KEY QUOTATIONS

"This court previously held that OHSAA is "an unincorporated association, and the decisions of the tribunals of such association with respect to its internal affairs will, in the absence of mistake, fraud, collusion or arbitrariness, be accepted by the courts as conclusive."" (64, ¶ 2)

"Because the trial court has already found that the exception applies, the court has jurisdiction in this instance. Accordingly, I would deny the writ." (64, ¶ 4)

FACTUAL BACKGROUND

The Ohio High School Athletic Association used Competitive Balance Rules to determine the divisions in which schools' teams would compete in tournaments. The trial judge found that the rules were arbitrary because they did not consider whether an individual school's team was competitive or account for the effect on Catholic schools whose students came from multiple feeder schools, and issued a temporary restraining order.

PROCEDURAL HISTORY

The trial court issued a temporary restraining order barring enforcement or implementation of the Competitive Balance Rules and found that the Ohio High School Athletic Association had acted arbitrarily. The Supreme Court of Ohio's majority granted the motion for an emergency stay and expedited alternative writ and established a briefing schedule. Justice O'Donnell dissented, concluding that the stay and alternative writ should be denied because the trial court had already found that the arbitrariness exception applied.

DISPOSITION

writ_granted

CASES CITED

- State ex rel. Ohio High School Athletic Assn. v. Judges of Court of Common Pleas, 173 Ohio St. 239, 181 N.E.2d 261 (1962)
- Massillon City School Dist. v. Ohio High School Athletic Assn., 5th Dist. Stark No. 7247, 1987 Ohio App. LEXIS 9541, at *6-7, 1987 WL 19827 (Nov. 5, 1987)
- Biesiada v. Ohio Soccer Assn. N., 8th Dist. Cuyahoga No. 65880, 1994 Ohio App. LEXIS 3348 (July 28, 1994)

