

IN THE SUPREME COURT OF OHIO

IN THE MATTER OF:)
)
LEE ADAMS, JR. ET AL.) CASE NO. 2006-1695
)
) ON APPEAL FROM THE
) CUYAHOGA COUNTY COURT
) OF APPEALS, EIGHTH
) APPELLATE DISTRICT
) CASE NO.: 87881
)
) TRIAL COURT:
) CASE NOS.: AD 03-901846 -848

**REQUEST FOR EXPEDITED CONSIDERATION OF
MOTION FOR APPOINTMENT OF COUNSEL FOR CHILDREN**

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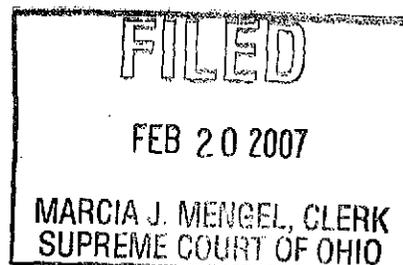
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INTRODUCTION

Now comes Appellees, Lee Adams, Jr. et al, by and through counsel of record, and respectfully moves this Honorable Court pursuant Ohio Supreme Court Rules of Practice 14 section 4 to appoint counsel for the children, for the reasons set forth in the memorandum attached hereon and incorporated herein.

MEMORANDUM IN SUPPORT

On July 1, 2004, the undersigned counsel was appointed by the Juvenile Division of the Cuyahoga County Court of Common Pleas to represent the children in this matter before that Court. The matter was fully litigated before that Court and on January 31, 2006. That Honorable Court denied the Cuyahoga County Department of Children and Family Services's (CCDCFS) Motion to Modify Temporary Custody to Permanent Custody. Subsequent to that ruling, the CCDCFS filed an appeal with the Court of Appeals, Eighth Judicial District of Ohio. That Court dismissed the appeal, stating that the matter was not a final appealable order. Said decision was journalized by the Clerk of Court on June 20, 2006.

The Cuyahoga County Prosecutor's Office filed a Notice of Appeal to the Supreme Court of Ohio and a Memorandum in Support of Jurisdiction of Appellant, on or about September 11, 2006, Case No. 2006-1695. The children are now Appellees in the matter before the Supreme Court of Ohio. The undersigned counsel's original appointment as counsel of record for Lee Adams, Jr. et. al. was terminated for purposes of the CCDCFS's appeal upon the appointment of Attorney Jeffrey Froude by this Honorable Court on May 18, 2006 to represent the children in

the appeal filed by CCDCFS. Subsequently his appointment was terminated upon that Honorable Court's journalization of their decision to dismiss the appeal. As a result, Lee Adams, Jr. et. al. do not have legal counsel representing them for the purposes of this matter pending before the Supreme Court of Ohio.

Supreme Court Practice Rule II(2)(D)(2) provides that:

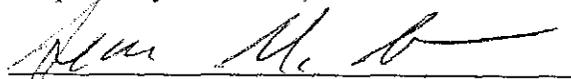
"In all appeals from a court of appeals, the court of appeals retains jurisdiction to appoint counsel to represent indigent parties before the Supreme Court"

This attorney therefore filed a motion to appoint counsel for the matter pending before this court on the children's behalf in the Court of Appeals, Eighth Judicial District of Ohio, on or about January 8, 2007. That motion was denied by that court.

This Honorable Court has appointed counsel for the mother and father of the children who are subject matter of this within matter, however no attorney has been appointed by either the Court of Appeals, Eighth Judicial District of Ohio, or by the Ohio Supreme Court.

WHEREFORE, the Adam's children, by and through counsel, requests that this Honorable Court appoint counsel for the children, who are subject matter of this within appeal. This request is not made to further delay this matter but to preserve the rights of the children who are the subject matter of this within case.

Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of the foregoing Request for Expedited Consideration of Motion for Appointment of Counsel For Children was served, by regular U.S. Mail to this 19th day of February, 2007 on:

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