

**IN THE SUPREME COURT OF OHIO
CASE NO. 2006-0957**

PROUSE, DASH & COUCH, LLP

Plaintiff-Appellant,

vs.

BRUCE ANTHONY GORCYCA, et al.

Defendants-Appellees.

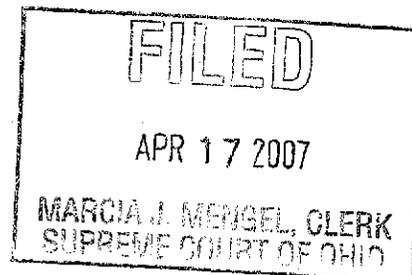
**ON APPEAL FROM THE
COURT OF APPEALS FOR
CUYAHOGA COUNTY,
EIGHTH APPELLATE DISTRICT**

**COURT OF APPEALS
CASE NO. 86324**

**LIST OF ADDITIONAL AUTHORITIES
SUPREME COURT RULE IX SECTION 32**

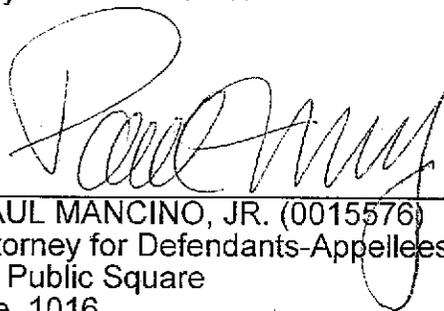
**PAUL MANCINO, JR. (0015576)
MANCINO, MANCINO & MANCINO
75 Public Square
Ste. 1016
Cleveland, Ohio 44113-2098
(216) 621-1742
(216) 621-8465 (Fax)
*Counsel for Defendants-Appellees***

**DANIEL F. LINDER (0063918)
LINDER & JORDAN LLP
55 Public Square
Ste. 1800
Cleveland, Ohio 44113
(216) 737-8888
(216) 737-9999 (Fax)
*Counsel for Plaintiff-Appellant***



At oral argument appellees intend to rely on *Sinochem International Co. LTD. v. Malaysia International Shipping Corp.* 127 S. Ct. 1184 (2007), for the proposition in that, considering a forum non conveniens dismissal, the court need not first determine its own jurisdiction when plaintiff's forum choice is not its home forum. Thus, any presumption in plaintiff's favor would apply with less force.

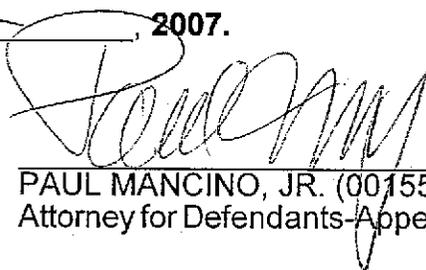
In *Barth v. Barth*, 113 Ohio St.3d 27, 862 N.E.2d 496 (2007), the issue of a party's residency was required to be determined without considering the motives of a party with regard to his or her establishment of residency outside of Ohio.



PAUL MANCINO, JR. (0015576)
Attorney for Defendants-Appellees
75 Public Square
Ste. 1016
Cleveland, Ohio 44113-2098
(216) 621-1742/ (216) 621-8465 (Fax)

SERVICE

A copy of the foregoing *List of Additional Authorities* has been mailed to Daniel F. Linder, Attorney for Plaintiff-Appellant, 55 Public Square, Ste. 1600, Cleveland, Ohio 44113-1964, on this 13th day of APRIL, 2007.



PAUL MANCINO, JR. (0015576)
Attorney for Defendants-Appellees