



**MEMORANDUM IN SUPPORT**

Appellants respectfully request an Order allowing them to supplement the record in this case with Affidavits from Franklin County Children Service ("FCCS") employees Heather Saling, Gil Ashbridge, and Harry Griggs. These employees have personal knowledge regarding the turnover rate among FCCS caseworkers, the amount of children in under the supervision of FCCS, and the amount of calls the referral hotline has received in the preceding two years, respectively. This information illustrates the public policy behind selecting a two-year statute of limitations for Section 1983 claims filed in Ohio, and said information is incorporated into Appellants' Merit Brief and referenced in the Appendix. Appellants' Merit Brief was filed contemporaneously with the instant Motion. Therefore, in the interests of justice, Appellants respectfully request an Order allowing them to supplement the record in this case with the aforementioned affidavits of the FCCS employees.

Respectfully submitted,

**RON O'BRIEN  
PROSECUTING ATTORNEY  
FRANKLIN COUNTY, OHIO**



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**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing "Motion to Supplement" was sent via ordinary mail, postage prepaid to Rev. Iyabo Nadra's last known address, P.O. Box 6965, Columbus, Ohio 43205, this 21 day of August, 2007.



R. Matthew Colon  
Assistant Prosecuting Attorney

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