

IN THE SUPREME COURT OF OHIO

DISCIPLINARY COUNSEL

CASE NO: 2006-1198

Relator,

vs.

TIM M. WATTERSON  
Respondent.

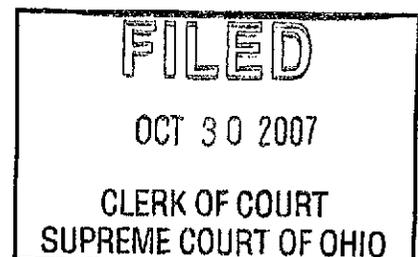
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RESPONDENT'S MOTION IN RESPONSE TO ORDER TO SHOW CAUSE  
ORDER IS EVIDENTLY AN OVERSIGHT, SINCE RESPONDENT WAS NOT  
LICENSED AT THE TIME AND HAD NO CLIENTS TO NOTIFY, MAKING  
THIS FORM ORDER INAPPLICABLE

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TIM M. WATTERSON  
111 Second Street NW, Suite 300  
Canton, Ohio 44702  
(330) 456-2262  
(former counsel # 0028264)

LORI J. BROWN  
Disciplinary Counsel  
The Supreme Court of Ohio  
250 Civic Center Drive, Suite 325  
Columbus, Ohio 43215-7205



**MOTION IN RESPONSE TO ORDER TO SHOW CAUSE**

**THIS FORM ORDER IS INAPPLICABLE TO RESPONDENT SINCE HE NEVER REAPPLIED FOR HIS LAW LICENSE AFTER HIS SIX MONTH SUSPENSION ON SEPTEMBER 22, 2004, AND THEREFORE HAD NO CLIENTS TO CONTACT. RESPONDENT FILED AN AFFIDAVIT OF COMPLIANCE ON THE PREVIOUS CASE, ON OCTOBER 22, 2004. THE OPINION ITSELF, NOTES THAT RESPONDENT HAD NOT REAPPLIED FOR HIS LAW LICENSE.**

Now comes Respondent, Tim M. Watterson, and files this motion in response to the Court's order of October 10, 2007, that he show cause as to why he should not be held in contempt for not filing an affidavit that he contacted his clients regarding his additional suspension on July 18, 2007.

This order, which is part of a form order, is evidently an oversight. Respondent was not licensed at the time of this case, so he had no clients to contact. He therefore could not file an affidavit that he had contacted his clients about this suspension.

Respondent did not reapply for his law license after his six month suspension of September 22, 2004. This is even noted in the opinion on this case. It reads, "Respondent has not reapplied for reinstatement to the practice of law." (p. 2, first para.)

Respondent did file an affidavit that he complied with the prior order to notify his clients of his six month suspension, on October 22, 2004. (Copy attached)

In fact, this suspension should have begun to run from the end of the last suspension, which was March 22, 2004. To start the suspension on July 18, 2007, makes it far more than a minimum two year suspension, under the period specified for an indefinite suspension.

For these reasons, there is no basis to find Respondent in contempt, for not filing an affidavit that he could not file.

Respectfully submitted,

  
Tim M. Watterson

Proof of Service

A copy of the foregoing was sent by ordinary mail to Disciplinary Counsel, Lori J. Brown, at the address on the cover page, on October 31, 2007.

  
Tim M. Watterson

wattt184

FILED

The Supreme Court of Ohio

OCT 10 2007

CLERK OF COURT  
SUPREME COURT OF OHIO

Disciplinary Counsel,  
Relator,

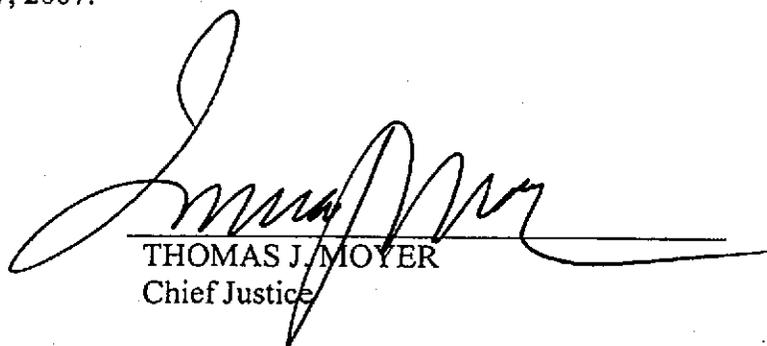
v.

Tim M. Watterson,  
Respondent.

Case No. 2006-1198

ORDER TO SHOW CAUSE

It is ordered by the court, sua sponte, that respondent show cause on or before 20 days from the date of this order, why respondent should not be found in contempt for failure to fully comply with this court's order of July 18, 2007, to wit: file an affidavit of compliance on or before August 17, 2007.



THOMAS J. MOYER  
Chief Justice

rec'd 10/12/07

IN THE SUPREME COURT OF OHIO

STARK COUNTY BAR ASSOCIATION  
RELATOR

Case No. 03-1808

v.

TIMOTHY WATTERSON, a.k.a.  
TIM M. WATTERSON  
RESPONDENT

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RESPONDENT'S AFFIDAVIT OF COMPLIANCE

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Richard S. Milligan, Esq.  
William W. Emley, Esq.  
Buckingham, Doolittle & Burroughs, LLP  
4518 Fulton Dr. NW  
PO Box 35548  
Canton, OH 44735-5548

COUNSEL FOR RELATOR

Tim M. Watterson (0028264)  
111 Second Street NW, Suite 300  
Canton, OH 44702  
(330) 456-2262

COUNSEL FOR RESPONDENT

FILED

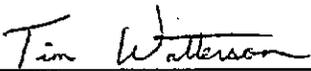
OCT 22 2004

MARCIA J. MENGEL, CLERK  
SUPREME COURT OF OHIO

**AFFIDAVIT OF COMPLIANCE**

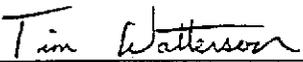
Now comes Respondent, Tim M. Watterson, and hereby files this Affidavit of Compliance to the order of the Ohio Supreme Court dated September 22, 2004. A sworn affidavit is attached.

Respectfully submitted,

  
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Tim M. Watterson (0028264)  
111 Second Street NW, Suite 300  
Canton, Ohio 44702  
(330) 456-2262

**PROOF OF SERVICE**

A copy of the foregoing was mailed by Ordinary U.S. Mail to Richard S. Milligan, Esq., Bar Counsel, Buckingham, Doolittle & Burroughs, LLP, 4518 Fulton Dr. NW, P.O. Box 35548, Canton, OH 44735-5548, this 22<sup>nd</sup> day of October, 2004.

  
\_\_\_\_\_  
Tim M. Watterson (0028264)

STATE OF OHIO  
STARK COUNTY

SS:

AFFIDAVIT

TIM M. WATTERSON, being first duly sworn according to law, deposes and states as follows:

1. I am the Respondent in Case Number 03-1808
2. I have notified all of my clients in writing regarding my suspension, and advised them on seeking legal service elsewhere.
3. All papers and all other property have been returned to my clients or made available for pickup. The clients have been contacted by phone as well. Arrangements have been made for substitution of counsel on all of my cases.
4. Any unearned fees or expenses have been returned, and money has been accounted for.
5. Opposing counsel on pending litigation have been notified in writing. All courts with pending litigation will be notified with a notice filed by Monday, October 25, 2004.
6. All notices have been sent by certified mail with a return address.

Further affiant sayeth naught.

Tim Watterson  
Tim M. Watterson

SWORN to before me and subscribed in my presence this 22<sup>nd</sup> day of  
October, 2004.

Jennifer White  
Notary  
JENNIFER CLARK, Notary Public  
State of Ohio  
My Commission Expires on Aug. 11, 2005  
AKA - Jennifer White