

IN THE SUPREME COURT OF OHIO

ABN AMRO MORTGAGE)
)
 Plaintiff-Appellee)
)
 Vs.)
)
 JACOB KANGAH, et al.,)
)
 Defendants-Appellees)
)
 CUYAHOGA COUNTY BOARD OF)
 COMMISSIONERS, DEPARTMENT)
 OF DEVELOPMENT)
)
 Defendant-Appellant)

CASE NO.: 09-0553
 On appeal from the Cuyahoga
 County Court of Appeals, Eighth
 Appellate District, Case No. CA 91401

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MOTION TO STAY

COUNSEL FOR APPELLEES

For ABN AMRO MORTGAGE
 GROUP, INC

ANN MARIE JOHNSON (0072981)
 MICHAEL T. HUFF (0077660)
 DANIELLE KONRAD PITCOCK (0069534)
 LEE R. SCHROEDER (0075358)
 MICHAEL J. SIKORA, III (0069512)
 8532 Mentor Ave.
 Mentor, Ohio 44060

CHRISTIAN E. NIKLAS (0066725)
 Shapiro & Felty
 1500 West Third Street, Ste. 400
 Cleveland, Ohio 44113

For JACOB KANGAH

KENNETH J. FREEMAN (0018940)
 Kenneth J. Freeman Co., LPA

COUNSEL FOR APPELLANT

WILLIAM D. MASON, Prosecuting
 Attorney for Cuyahoga County, Ohio

BY: KELLI KAY PERK (0068411)
 Assistant Prosecuting Attorney
 Justice Center, Courts Tower
 1200 Ontario Street, 8th Floor
 Cleveland, Ohio 44113
 216.443.7851

FILED
 MAY 21 2009
 CLERK OF COURT
 SUPREME COURT OF OHIO

515 Leader Building
526 Superior Avenue
Cleveland, Ohio 44113

IN THE SUPREME COURT OF OHIO

ABN AMRO MORTGAGE)	CASE NO.: 09-0553
)	
Plaintiff-Appellee)	On appeal from the Cuyahoga
)	County Court of Appeals, Eighth
Vs.)	Appellate District, Case No. CA 91401
)	
JACOB KANGAH, et al.,)	
)	
Defendants-Appellees)	<u>MOTION TO STAY</u>
)	
CUYAHOGA COUNTY BOARD OF COMMISSIONERS, DEPARTMENT OF DEVELOPMENT)	
)	
Defendant-Appellant)	

Now comes Appellant the Board of Cuyahoga County Commissioners Department of Development, by and through Cuyahoga County Prosecutor William D. Mason and Assistant Prosecuting Attorney Kelli Kay Perk, and moves for an order staying the trial court proceedings in this matter.

For cause, Appellant states that the Cuyahoga County Common Pleas Court has stated that Plaintiff/Appellee ABN Amro Mortgage Group Inc. may proceed with the Sheriff's sale of the subject property. To that end, Plaintiff/Appellee has filed a praecipe for order of sale (See Exh. A.)

The issue in the present appeal/certified conflict concerns lien priority. Plaintiff/Appellee claims that a portion of its mortgage has priority over Appellant's mortgage. Appellant claims its mortgage has priority over Plaintiff/Appellee's mortgage. Until this appeal is resolved, and the lien priorities determined, the subject property

should not be sold. Pursuant to R.C. 2505.12, because Appellant is a political subdivision, no bond is required.

Therefore, Appellant respectfully moves this honorable Court for an order staying the trial court proceedings in this matter until the present appeal/certified conflict has concluded.

Respectfully submitted,

WILLIAM D. MASON, Prosecuting
Attorney for Cuyahoga County, Ohio



KELLI KAY PERK (0068411)
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Attorneys for Appellant

PROOF OF SERVICE

A true copy of the foregoing Motion to Stay was served this 20th day of May 2009, by regular U.S. Mail, postage prepaid upon:

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KELLI KAY PERK (0068411)
Assistant Prosecuting Attorney



Gerald E. Fuerst, Clerk of Courts

Court of Common Pleas - Cuyahoga County, Ohio



DOCKET INFORMATION

Printer Friendly Version

Case Number: CV-06-606632

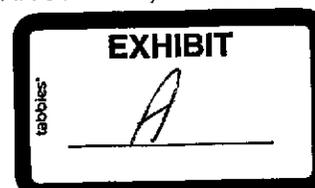
Case Title: ABN AMRO MORT. GROUP, INC. vs. JACOB KANGAH ETAL

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DOCKET INFORMATION

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Date	Side	Type	Description	Image
05/15/2009	P1	SF	DEPOSIT AMOUNT PAID SHAPIRO, VAN ESS, PHILLIPS AND BARRGATE, LLP.	
05/15/2009	P1	SF	PRAECIPE FOR ORDER OF SALE FILED DEP. \$500.00 CHRIS E. MANOLIS (0076197)	
04/29/2009	N/A	JE	THE OBJECTION TO THE MAGISTRATE'S DECISION WAS OVERRULED AND SAID DECISION WAS AFFIRMED BY THE COURT OF APPEALS. BY THIS SEPARATE AND DISTINCT INSTRUMENT, THE COURT ADOPTS THE MAGISTRATE'S DECISION, DATED APRIL 15, 2008, ATTACHED HERETO AND INCORPORATED HEREIN. THE COURT GRANTS THE FOLLOWING RELIEF ON THE ISSUES ORIGINALLY SUBMITTED TO THE COURT. JUDGMENT FOR PLAINTIFF AGAINST DEFENDANT JACOB KANGAH IN THE SUM OF \$71,787.09 WITH INTEREST THEREON AT THE RATE OF 6.5% PER ANNUM FROM JULY 1, 2006. DECREE OF FORECLOSURE FOR PLAINTIFF. PLAINTIFF MAY ORDER TO SHERIFF'S SALE THE PROPERTY LOCATED AT 20617 LIBBY ROAD, MAPLE HEIGHTS, OHIO. PPN: 782-23-088. PURSUANT TO CIV. R. 54(B) THE COURT FINDS THERE IS NO JUST CAUSE FOR DELAY. CLRCS 04/29/2009 NOTICE ISSUED	
02/13/2009	P	JE	*****C/A***** JOURNAL ENTRY AND OPINION -JUDGMENT: AFFIRMED.. NOTICE ISSUED	
06/17/2008	N/A	MG	P1 ABN AMRO MORTGAGE GROUP INC MOTION OF PLTF ABN AMRO MORTGAGE GROUP INC. TO STRIKE DEFT CUYAHOGA COUNTY BOARD OF COMMISSIONERS, DEPT OF DEVELOPMENTS OBJECTIONS TO THE MAGISTRATE'S DECISION OR IN THE ALTERNATIVE BRIEF IN OPPOSITION TO DEFT CUYAHOGA COUNTY BOARD OF COMMISSIONERS DEPT OF DEVELOPMENT'S OBJECTIONS TO THE MAGISTRATE'S DECISION. MICHAEL T. HUFF 0077660, FILED 05/08/2008, IS UNKNOWN. ALL RULINGS IN THIS MATTER ARE HELD IN ABEYANCE PENDING THE DETERMINATION BY THE COURT OF APPEALS. CLTMP 06/17/2008 NOTICE ISSUED	
06/17/2008	N/A	MG	D4 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY MOTION TO CLARIFY KELLI KAY PERK 0068411, FILED 04/28/2008, IS	



MOOT. APPEAL FILED 5/5/2008. CLTMP 06/17/2008 NOTICE ISSUED

05/09/2008 D4 CA APPELLANT'S 9A RECORD TRANSMITTED TO THE COURT OF APPEALS CONSISTING OF THE TRANSCRIPT OF THE DOCKET, JOURNAL ENTRIES AND THE ORIGINAL PAPERS ON CA NO. 91401.

05/08/2008 P1 MO P1 ABN AMRO MORTGAGE GROUP INC MOTION OF PLTF ABN AMRO MORTGAGE GROUP INC. TO STRIKE DEFT CUYAHOGA COUNTY BOARD OF COMMISSIONERS, DEPT OF DEVELOPMENTS OBJECTIONS TO THE MAGISTRATE'S DECISION OR IN THE ALTERNATIVE BRIEF IN OPPOSITION TO DEFT CUYAHOGA COUNTY BOARD OF COMMISSIONERS DEPT OF DEVELOPMENT'S OBJECTIONS TO THE MAGISTRATE'S DECISION. MICHAEL T. HUFF 0077660 06/17/2008 - UNKNOWN

05/05/2008 D4 CA ----- NOTICE OF APPEAL ----- CA NO. 91401
NOTICE OF APPEAL FILED BY THE DEFT. APPELLANT W/A 9A PRAECIPE AND DOCKETING STATEMENT ON THE ACCELERATED CALENDAR. COPIES MAILED.

04/28/2008 D4 OB D4 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY OBJECTIONS TO THE MAGISTRATES DECISION. KELLI KAY PERK 0068411

04/28/2008 D4 MO D4 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY MOTION TO CLARIFY KELLI KAY PERK 0068411 06/17/2008 - MOOT

04/15/2008 P OT 4-15-08 ... MAGISTRATE'S DECISION FILED AND NOTICE ISSUED

04/08/2008 N/A JE P1 ABN AMRO MORTGAGE GROUP INC MOTION FOR SUMMARY JUDGMENT ON THE ISSUE OF PRIORITY ANN M JOHNSON 0072981, FILED 08/01/2007, IS GRANTED BASED ON THE DOCTRINE OF EQUITABLE SUBROGATION. EQUITABLE SUBROGATION IS ESSENTIALLY A THEORY OF UNJUST ENRICHMENT AND MAY DEFEAT THE STATUTORY RULE OF FIRST IN TIME, FIRST IN RIGHT. IN THIS CASE, PLAINTIFF PAID THE FIRST MORTGAGE LIEN AND TAXES WHEN DEFENDANT JACOB KANGAH REFINANCED THE SUBJECT PROPERTY. DEFENDANT CUYAHOGA COUNTY DEPARTMENT OF DEVELOPMENT (CCDOD) HELD A SUBORDINATE MORTGAGE AND SHOULD NOT BE UNJUSTLY ENRICHED BEYOND THE VALUE OF THE ORIGINAL FIRST MORTGAGE. ACCORDINGLY, PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT IS GRANTED. NO JUST CAUSE FOR DELAY. CLTMP 03/31/2008 NOTICE ISSUED

04/07/2008 P1 OT P1 ABN AMRO MORTGAGE GROUP INC SUPPLEMENTAL FINAL JUDICIAL REPORT.....W..... CHRISTIAN E. NIKLAS 0066725

04/07/2008 P1 OT P1 ABN AMRO MORTGAGE GROUP INC NOTICE OF FILING OF SUPPLEMENTAL FINAL JUDICIAL REPORT.....W..... CHRISTIAN E. NIKLAS 0066725

03/31/2008 N/A MG PLAINTIFF TO SUBMIT A PROPOSED MAGISTRATE'S DECISION AND UPDATED TITLEWORK WITHIN 14 DAYS OF THIS COURT'S ORDER. CLTMP 03/31/2008 NOTICE ISSUED

03/31/2008 N/A MG P1 ABN AMRO MORTGAGE GROUP INC MOTION FOR SUMMARY JUDGMENT.....W.. DANIEL M SPIRKO 0072457, FILED 04/12/2007, IS GRANTED AS TO THE INTEREST OF JACOB KANGAH AND IVORY KANGAH. MAGISTRATE'S DECISION SHALL ISSUE BY SEPARATE ORDER. CLTMP 03/31/2008 NOTICE ISSUED

01/10/2008 P1 OT P1 ABN AMRO MORTGAGE GROUP INC REPLY OF PLTF. TO THE BREIF OF CUY. CO. BD. OF COMMISSIONERS, DEPT. OF DEVELOPMENT, IN OPPOSITOIN TO PLTF'S MOTINO FOR SUMMARY JUDGMENT ON THE ISSUE OF PRIORITY..... DANIELLE KONRAD

PITCOCK (0069534)

12/28/2007 D4 BR D4 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY BRIEF IN OPP. TO PLTF'S MOTION FOR SUMMARY JUDGMENT....W..... JUDITH MILES 0081006

12/28/2007 D4 OT D4 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY NOTICE OF APPEARANCE....W..... JUDITH MILES 0081006

12/05/2007 N/A MG CORRECTIVE ENTRY - BRIEFS IN OPPOSITION TO THE CURRENT OUTSTANDING MOTIONS FOR SUMMARY JUDGMENT TO BE FILED BY 12/28/2007. NO EXTENSIONS SHALL BE GRANTED. CLTMP 12/05/2007 NOTICE ISSUED 

11/28/2007 N/A MG BRIEFS IN OPPOSITION TO THE CURRENT OUTSTANDING MOTIONS FOR SUMMARY JUDGMENT TO BE FILED BY 11/28/2007. NO EXTENSIONS SHALL BE GRANTED. CLPAL 11/27/2007 NOTICE ISSUED 

11/28/2007 N/A JE AS THE AUTOMATIC STAY IMPOSED BY SECTION 362 OF THE BANKRUPTCY CODE IS NO LONGER IN EFFECT, THE CASE IS REINSTATED TO THE ACTIVE DOCKET. A PARTY SEEKING A DEFAULT JUDGMENT MUST FILE A MOTION FOR DEFAULT JUDGMENT. ONCE A CASE IS SET FOR DEFAULT JUDGMENT, THE MOTION FOR DEFAULT JUDGMENT MAY BE WITHDRAWN ONLY BY SEPARATE MOTION WITH GOOD CAUSE SHOWN. CLPAL 11/27/2007 NOTICE ISSUED 

10/24/2007 P1 MO P1 ABN AMRO MORTGAGE GROUP INC MOTION TO REINSTATE CASE TO COURTS ACTIVE DOCKET.....W..... CHRISTIAN E. NIKLAS 0066725 11/28/2007 - GRANTED

08/24/2007 D OT DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) NOTICE OF STAY PROCEEDINGS. KENNETH J FREEMAN 0018940

08/24/2007 N/A JE THE COURT HAS BEEN INFORMED OF PENDING BANKRUPTCY CASE NO. 07-16114. ALL PROCEEDINGS IN THIS ACTION ARE HEREBY STAYED. CASE TO BE REINSTATED ONLY UPON MOTION. CLTMP 08/23/2007 NOTICE ISSUED 

08/20/2007 P1 OT P1 ABN AMRO MORTGAGE GROUP INC SUGGESTION OF STAY UNDER BANKRUPTCY CODE.....W... CHRISTIAN E. NIKLAS 0066725

08/01/2007 P1 MO P1 ABN AMRO MORTGAGE GROUP INC MOTION FOR SUMMARY JUDGMENT ON THE ISSUE OF PRIORITY ANN M JOHNSON 0072981 04/08/2008 - GRANTED

05/29/2007 D OT DEFT. CUYAHOGA COUNTY BOARD OF COMMISSIONERS NOTICE OF SUBSTITUTION OF COUNSEL..... KELLI KAY PERK (0068411)

05/24/2007 P1 OT P1 ABN AMRO MORTGAGE GROUP INC WITHDRAWAL OF FORMER COUNSEL AND NOTICE OF APPEARANCE OF SUBSTITUTE COUNSEL FOR PLAINTIFF.....W..... DANIEL M SPIRKO 0072457

05/11/2007 P1 OT P1 ABN AMRO MORTGAGE GROUP INC NOTICE OF FILING OF PROPOSED MAGISTRATE'S DECISION.....(W)..... DANIEL M SPIRKO 0072457

04/12/2007 P1 MO P1 ABN AMRO MORTGAGE GROUP INC MOTION FOR SUMMARY JUDGMENT.....W.. DANIEL M SPIRKO 0072457 03/31/2008 - GRANTED

04/11/2007 N/A MG PRE-TRIAL SET FOR 11/06/2007 AT 10:00 AM. DEFAULT HEARING OF 4/10/2007 CONVERTED TO A CASE MGMNT CONFERENCE. ALL PARTIES WERE PRESENT AND AGREED TO THE FOLLOWING SCHEDULE. DISCOVERY CUT-OFF, 7/11/2007. DISPOSITIVE MOTIONS, TO INCLUDE BRIEFING ON THE ISSUE OF PRIORITY BETWEEN THE CITY OF CLEVELAND AND PLAINTIFF ABN AMRO, TO 

BE FILED BY 8/1/2007. BRIEF IN OPPOSITION AND REPLY THERETO TO BE FILED PURSUANT TO LOCAL RULE 11. ALL NECESSARY PARTIES TO BE PRESENT FOR PRE-TRIAL TO SET TRIAL SCHEDULE IF NECESSARY. BOOK 3848 PAGE 141 04/11/2007 NOTICE ISSUED

04/11/2007 N/A MG P1 ABN AMRO MORTGAGE GROUP INC MOTION FOR DEFAULT JUDGMENT.....(W)..... DANIEL M SPIRKO 0072457, FILED 12/28/2006, IS DENIED. BOOK 3848 PAGE 0290 04/11/2007 NOTICE ISSUED 

04/11/2007 N/A MG DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) MOTION FOR LEAVE TO FILE ANSWER INSTANTER KENNETH J FREEMAN 0018940, FILED 04/03/2007, IS GRANTED. DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) MOTION FOR LEAVE TO FILE ANSWER INSTANTER TO CROSS-CLAIM OF BOARD OF COUNTY COMMISSIONERS KENNETH J FREEMAN 0018940, FILED 04/04/2007, IS GRANTED. DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) MOTION FOR LEAVE TO FILE ANSWER INSTANTER TO CROSS CLAIM OF NAVY FEDERAL CREDIT UNION KENNETH J FREEMAN 0018940, FILED 04/04/2007, IS GRANTED. BOOK 3848 PAGE 0289 04/11/2007 NOTICE ISSUED 

04/04/2007 D MO DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) MOTION FOR LEAVE TO FILE ANSWER INSTANTER TO CROSS CLAIM OF NAVY FEDERAL CREDIT UNION KENNETH J FREEMAN 0018940 04/11/2007 - GRANTED

04/04/2007 D MO DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) MOTION FOR LEAVE TO FILE ANSWER INSTANTER TO CROSS-CLAIM OF BOARD OF COUNTY COMMISSIONERS KENNETH J FREEMAN 0018940 04/11/2007 - GRANTED

04/04/2007 D AN DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) ASNWER TO CROSS-CLAIM. KENNETH J FREEMAN 0018940

04/03/2007 D AN DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) ANSWER OF DEFENDANTS. KENNETH J FREEMAN 0018940

04/03/2007 D MO DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) MOTION FOR LEAVE TO FILE ANSWER INSTANTER KENNETH J FREEMAN 0018940 04/11/2007 - GRANTED

04/03/2007 D OT DEFENDANT(S) JACOB KANGAH(D1) and IVORY KANGAH(D2) RESPONSE IN OPPOSITION TO MOTION FOR DEFAULT JUDGMENT. KENNETH J FREEMAN 0018940

03/19/2007 P1 OT NOTICE OF APPEARANCE OF CO COUNSEL MICHAEL J. SIKORA (0069512)

01/10/2007 P1 OT P1 ABN AMRO MORTGAGE GROUP INC NOTICE OF HEARING, SET FOR APRIL 10, 2007 AT 3:30 PM.....W... DANIEL M SPIRKO 0072457

01/08/2007 N/A MG MOTION FOR DEFAULT JUDGMENT IS SET FOR HEARING ON 04/10/2007 AT 03:30PM BEFORE MAGISTRATE TRACEY GONZALEZ, 10 FLOOR, JUSTICE CENTER. THE MOVING PARTY MUST SEND NOTICE OF THE DATE AND TIME OF THIS HEARING AND A COPY OF THE MOTION TO ALL PARTIES, INCLUDING THOSE WHO HAVE YET TO ENTER AN APPEARANCE, AT LEAST 14 DAYS IN ADVANCE OF THE HEARING. FAILURE TO APPEAR MAY RESULT IN DISMISSAL OF THE CLAIMS OR AN ENTRY OF JUDGMENT. BOOK 3764 PAGE 0226 01/08/2007 NOTICE ISSUED 

12/28/2006 N/A OT FINAL JUDICIAL REPORT.....(W).....

12/28/2006 N/A AF AFFIDAVIT AS TO MILITARY SERVICE.....(W).....

12/28/2006 N/A OT CERTIFICATE OF READINESS.....(W).....

12/28/2006 P1 MO P1 ABN AMRO MORTGAGE GROUP INC MOTION FOR DEFAULT JUDGMENT.....(W)..... DANIEL M SPIRKO 0072457 04/11/2007 - DENIED

12/27/2006 P1 OT P1 ABN AMRO MORTGAGE GROUP INC REQUEST FOR CHANGE OF DOCKET.....(W)..... DANIEL M SPIRKO 0072457

12/18/2006 D3 OT D3 NAVY FEDERAL CREDIT UNION REPLY TO CROSSCLAIM..... (W)..... PAUL M NALEPKA 0040796

12/12/2006 D1 SR CERTIFIED MAIL RECEIPT NO. 9266342 RETURNED 12/12/2006 FAILURE OF SERVICE ON DEFENDANT KANGAH/JACOB/ - UNCLAIMED NOTICE MAILED TO PLAINTIFF(S) ATTORNEY

12/12/2006 D2 SR CERTIFIED MAIL RECEIPT NO. 9266343 RETURNED 12/12/2006 FAILURE OF SERVICE ON DEFENDANT KANGAH/IVORY/ - UNCLAIMED NOTICE MAILED TO PLAINTIFF(S) ATTORNEY

12/04/2006 D4 AN D4 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY ANSWER AND CROSS CLAIM OF DEFT. GREGORY B ROWINSKI 0007197

11/27/2006 D3 AN D3 NAVY FEDERAL CREDIT UNION ANSWER AND CROSSCLAIM..... (W)..... PAUL M NALEPKA 0040796

11/22/2006 D2 SR 9266362 ON 11/17/2006 I SERVED THE WITHIN NAMED KANGAH/IVORY/ BY SERVING A TRUE AND CERTIFIED COPY THEREOF WITH ALL THE ENDORSEMENTS THEREON. S.P.S.

11/22/2006 D4 SR 9266363 ON 11/16/2006 I SERVED THE WITHIN NAMED OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY BY SERVING A TRUE AND CERTIFIED COPY THEREOF WITH ALL THE ENDORSEMENTS THEREON. S.P.S.

11/22/2006 D1 SR 9266361 ON 11/17/2006 I SERVED THE WITHIN NAMED KANGAH/JACOB/ BY SERVING A TRUE AND CERTIFIED COPY THEREOF WITH ALL THE ENDORSEMENTS THEREON. S.P.S.

11/21/2006 D3 SR CERTIFIED MAIL RECEIPT NO. 9266344 RETURNED BY U.S. MAIL DEPARTMENT 11/21/2006 NAVY FEDERAL CREDIT UNION MAIL RECEIVED AT ADDRESS 11/17/2006 SIGNED BY OTHER.

11/16/2006 D4 SR CERTIFIED MAIL RECEIPT NO. 9266345 RETURNED BY U.S. MAIL DEPARTMENT 11/16/2006 OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY MAIL RECEIVED AT ADDRESS 11/15/2006 SIGNED BY OTHER.

11/14/2006 N/A SF MAGISTRATE TRACEY GONZALEZ ASSIGNED (RANDOM)

11/14/2006 D4 SR SUMS COMPLAINT(9266345) SENT BY CERTIFIED MAIL. TO: OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY ATTN: BUSINESS ADMINISTRATOR 112 HAMILTON COURT 4TH FLOOR CLEVELAND, OH 44114-0000

11/14/2006 D3 SR SUMS COMPLAINT(9266344) SENT BY CERTIFIED MAIL. TO: NAVY FEDERAL CREDIT UNION P O BOX 3327 MERRIFIELD, VA 22119-0000

11/14/2006 D2 SR SUMS COMPLAINT(9266343) SENT BY CERTIFIED MAIL. TO: IVORY KANGAH 337 EAST 244TH STREET EUCLID, OH 44123-0000

11/14/2006 D1 SR SUMS COMPLAINT(9266342) SENT BY CERTIFIED MAIL. TO: JACOB KANGAH 337 EAST 244TH STREET EUCLID, OH 44123-0000

11/13/2006 D4 SR SUMS COMPLAINT(9266363) SENT BY SPECIAL PROCESS SERVER. TO: OHIO DEPARTMENT OF DEVELOPMENT CUYAHOGA COUNTY ATTN: BUSINESS ADMINISTRATOR 112 HAMILTON COURT 4TH FLOOR CLEVELAND, OH 44114-0000

11/13/2006 D2 SR SUMS COMPLAINT(9266362) SENT BY SPECIAL PROCESS SERVER. TO: IVORY KANGAH 337 EAST 244TH STREET EUCLID, OH 44123-

0000

11/13/2006 D1 SR SUMS COMPLAINT(9266361) SENT BY SPECIAL PROCESS SERVER.
TO: JACOB KANGAH 337 EAST 244TH STREET EUCLID, OH 44123-0000

11/09/2006 D4 CS WRIT FEE

11/09/2006 D2 CS WRIT FEE

11/09/2006 D1 CS WRIT FEE

11/09/2006 D4 CS WRIT FEE

11/09/2006 D3 CS WRIT FEE

11/09/2006 D2 CS WRIT FEE

11/09/2006 D1 CS WRIT FEE

11/09/2006 N/A JE IT IS ORDERED BY THE COURT THAT THIS CAUSE BE REFERRED TO THE COURT MAGISTRATE TO TRY THE ISSUES OF LAW AND FACT ARISING THEREIN AND REPORT WITHOUT UNNECESSARY DELAY. A PARTY SEEKING A DEFAULT OR SUMMARY JUDGMENT ON A CLAIM FOR FORECLOSURE MUST FILE A COMPLETED 'CERTIFICATE OF READINESS' ALONG WITH THE PARTY'S MOTION FOR DEFAULT OR SUMMARY JUDGMENT. IF ANY OF THE REQUIREMENTS OF THE CERTIFICATE OF READINESS ARE NOT MET AS OF THE DATE OF THE DEFAULT HEARING IN CASES WHERE AT LEAST ONE PARTY HAS NOT ANSWERED MOVANT'S CLAIMS OR AS OF THE DATE A RESPONSE IS DUE TO THE MOTION FOR SUMMARY JUDGMENT IN CASES WHERE ALL PARTIES HAVE ANSWERED MOVANT'S CLAIMS, THE CASE WILL BE DISMISSED WITHOUT PREJUDICE. 'CERTIFICATE OF READINESS' FORMS ARE AVAILABLE FROM THE MAGISTRATES' DEPARTMENT ON THE 10TH FLOOR OF THE JUSTICE CENTER. ONCE A CASE IS SET FOR DEFAULT JUDGMENT, THE MOTION FOR DEFAULT JUDGMENT MAY BE WITHDRAWN ONLY BY SEPARATE MOTION WITH GOOD CAUSE SHOWN. BOOK 3718 PAGE 0529 11/09/2006 NOTICE ISSUED

11/08/2006 N/A SF JUDGE PETER J CORRIGAN ASSIGNED (RANDOM)

11/08/2006 P1 SF SPECIAL PROJECTS FUND FEE

11/08/2006 P1 SF LEGAL RESEARCH

11/08/2006 P1 SF LEGAL NEWS

11/08/2006 P1 SF LEGAL AID

11/08/2006 P1 SF COMPUTER FEE

11/08/2006 P1 SF CLERK'S FEE

11/08/2006 P1 SF DEPOSIT AMOUNT PAID SHAPIRO & FELTY

11/08/2006 P1 SF DEPOSIT AMOUNT PAID SHAPIRO & FELTY

11/08/2006 N/A SF CASE FILED

11/08/2006 P1 SR PRELIMINARY JUDICIAL REPORT FILED.

11/08/2006 P1 SR COMPLAINT FILED. SERVICE REQUEST - SUMMONS BY PROCESS SERVER AND CERTIFIED MAIL TO THE DEFENDANT(S)..

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For questions/comments please [click here](#)

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