

IN THE SUPREME COURT OF OHIO

STATE OF OHIO

Appellee

-vs-

JAMES E. TRIMBLE

Appellant

*

CASE NO. 05-2436

*

On Appeal from the Portage County
Common Pleas Court,
Case No. 2005-CR-0022

*

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CAPITAL CASE

*

MOTION FOR EXTRAORDINARY ATTORNEY FEES

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SUPREME COURT OF OHIO

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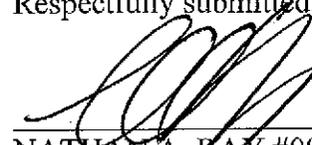
Now comes the attorneys who represented the Appellant, JAMES E. TRIMBLE, before this Court, and respectfully move this Court for extraordinary fees in this case. Counsel was appointed to represent Mr. Trimble on November 21, 2005. The trial and mitigation hearing in this case lasted for several weeks. Given the length of the transcript in this case, the record was not transferred from Portage County to this Court until November 28, 2006. There were an extensive number of pre-trial motions filed in this case. Counsel obtained and reviewed all pre-trial motions, met with trial counsel and discussed the case and the issues for review. Counsel also met with the attorneys at the state public defenders office, who were representing Mr. Trimble in post-conviction proceedings, and reviewed the trial attorney files which were in the possession of post-conviction counsel. Counsel also reviewed the exhibits and file that had been transferred to this Court from the Portage County Clerk of Courts.

The transcript in this case was over seven thousand three hundred pages (7,300). An extensive amount of time was spent in reviewing the transcript, preparing issue lists, researching the issues and than in the preparation of the brief. Given the length of the transcript in this case,

as well as the amount of document review and research, an extensive amount of time was spent in the preparation for oral argument.

This was a capital case. A great amount of time and work went into reviewing the record and in the preparation of the brief in this case. It is therefore requested that counsel for Mr. Trimble be awarded extraordinary fees in this matter.

Respectfully submitted,



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PROOF OF SERVICE

I hereby certify that a copy of the foregoing has been mailed by regular U.S. Mail this 6th day of August, 2009, to the Portage County Prosecuting Attorneys Office, 241 South Chestnut Street, Ravenna, Ohio 44266.



NATHAN A. RAY
LAWRENCE J. WHITNEY
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