

ORIGINAL

IN THE SUPREME COURT OF OHIO

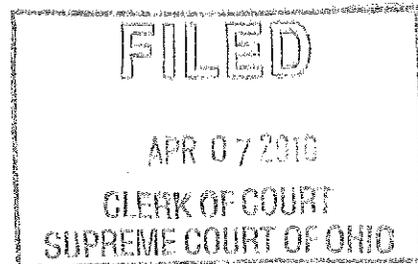
STATE OF OHIO
PLAINTIFF-APPELLEE
CITY OF BROOKLYN
VS
ANTHONY KUSHLAK
DEFENDANT-APPELLANT

LOWER CASE No. 09CRB 02437
EIGHTH APPELLATE DISTRICT
CASE No. 94124
SUPREME COURT OF OHIO
CASE No. 10-0333

MOTION TO STAY

ANTHONY KUSHLAK
1714 TREADWAY
CLEVELAND OHIO 44109
216-459-2202
DEFENDANT- APPELLANT

HILLARY GOLDBERG
7619 MEMPHIS AVE
BROOKLYN OHIO 44144
216-351-2133
COUNSEL FOR APPELLEE
CITY OF BROOKLYN



ANTHONY KUSHLAK, APPELLANT, IS REQUESTING THIS MOTION TO STAY BE GRANTED BECAUSE THIS CASE HAS ALREADY GENERATED A \$10,000 OUTSTANDING BILL. MY SOCIAL SECURITY DISABILITY BENEFITS HAVE NOT BEEN REINSTATED. MEDICARE WAS LOST FOR FAILURE TO PAY THE \$437 PREMIUM. THE \$3,000 BILL TO SOCIAL SECURITY HAS NOT BEEN RESOLVED, NOW ANTHONY KUSHLAK MAY HAVE TO SERVE SUSPENDED JAIL TIME FOR FAILURE TO PAY THE COURT ORDERED \$656 FINE, PLUS POSSIBLY ADDITIONAL JAIL TIME. THIS MEANS THAT LILLIAN KUSHLAK WILL THEN BE PROBATED ONCE AGAIN TO A NURSING HOME BECAUSE SHE CANNOT TAKE CARE OF HERSELF AND BABY KUSHLAK WILL ONCE AGAIN BE PUT IN A BOARDING, KENNEL. LILLIAN KUSHLAK

WILL THEN BE POSSIBLY FORCED INTO
BANKRUPTCY. ANTHONY KUSHLAK IS REQUESTING
TO THE SUPREME COURT OF OHIO TO HONOR
THIS MOTION TO STAY SO THE PARMA
MUNICIPAL COURT SYSTEM DOES NOT IMPOSE
FORTHWITH ALL SUSPENDED JAIL TIME FOR
FAILURE TO PAY THE FINE UNTIL THE
HONORABLE SUPREME COURT OF OHIO REVIEWS
THE MEMORANDUM IN SUPPORT OF JURISDICTION
OF APPELLANT ANTHONY KUSHLAK

RESPECTFULLY SUBMITTED

Anthony Kushlak

ANTHONY KUSHLAK
1714 TREADWAY
CLEVE. OHIO 44109

Parma Municipal Court
5555 Powers Boulevard
Parma, Ohio 44129-5593
(440) 887-7400
www.parmamunicipalcourt.org

Marty Vittardi
Clerk of Courts

ANTHONY KUSHLAK
1714 TREADWAY
CLEVELAND, OH 44109

SHOW CAUSE HEARING
FOR FAILURE TO PAY FINES

Defendant: ANTHONY KUSHLAK
Case Number: 09CRB02437

You have failed to abide by terms of the payment agreement ordered by this court and have therefore caused the payment agreement to become NULL AND VOID.

You are hereby SUMMONED and ORDERED to appear for a payment hearing on 04/08/2010 at 10:30 AM (Court Room 4) unless payment is made in full by this court date.

YOU MUST EITHER:

- 1.) **PAY YOUR FINE AND COSTS IN FULL BY THE ABOVE COURT DATE.**
The Clerk's Office is open from 8:00 AM to 5:00 PM Monday through Friday and accepts cash, money orders, personal checks, all major credit card, debit cards. We accept credit card payments by phone during business hours.
- 2.) **APPEAR IN COURT AT THE ABOVE TIME AND DATE BEFORE THE MAGISTRATE OR JUDGE. CHECK IN WITH THE PAYMENT OFFICER AT THE CLERK'S OFFICE PRIOR TO GOING INTO COURT ROOM 4. DO NOT COME EARLIER THEN THE SCHEDULED TIME.**

If you fail to appear at the time and place stated above or make full payment, CONTEMPT OF COURT proceedings will be initiated and a WARRANT will be issued for your arrest. Your case will be forwarded to a COLLECTION AGENCY immediately and 30% will be added to your total owed by the collection agency.

In addition, your registration, driver's license and the issuance of license plates will be blocked by the Bureau of Motor Vehicles.

CONTEMPT OF COURT is a criminal proceeding which carries a maximum of thirty (30) days in jail and/or a \$250.00 fine.

IMPORTANT NOTICE: THE ABOVE AMOUNT MAY NOT REPRESENT ALL THE MONEY OWED FOR OTHER CASES ADJUDICATED IN THIS COURT.

Mailed this 03/23/2010
Incident Number: 200905644

PARMA MUNICIPAL COURT
5555 POWERS BLVD.
PARMA OHIO 44129
(440) 887-7400

Court Ordered Payment Plan

11/25/2009

ANTHONY KUSHLAK
1714 TREADWAY
CLEVELAND, OH 44109

Case #: 09CRB02437

Total Amount Due As Ordered \$656.00
Total Amount Paid to-date

PAYMENT DUE DATE	PAYMENT AMOUNT	AMOUNT PAID ON PAYMENT
02/19/2010	656.00	0.00

TIME PAYMENT PROGRAM

I, ANTHONY KUSHLAK, am able to pay fines, courts costs or both to the Parma Municipal Court. I agree to pay the fines and costs assessed to me in the Parma Municipal Court case(s) listed below or as ordered by the court:

Case Number(s): **09CRB02437**

My fine(s) and costs totaling **\$656.00** will be paid in the aboved named manner. The terms of this agreement will not change unless approved by the Payment Officer or court order. I understand that failure to meet any of the obligations stated in this agreement shall result in my **TERMINATION FROM THE PROGRAM AND WARRANT BEING ISSUED FOR MY ARREST**. Any failure to pay fines warrants that are issued are subject to immediate forwarding to a collection agency. The collection agency will add 30% to the total amount owed.

I also understand that any future written communications from this Court caused by payment delinquency will result in additional court costs.

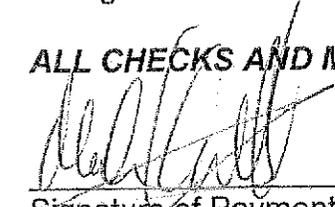
Parma Municipal Court is open Monday through Friday, between 8:00am and 5:00pm and is closed all government observed holidays.

I affirm that the above information is correct and agree to the terms of the Time Payment Program stated herein and as ordered by the Judge or Magistrate.

I understand that it is my responsibility to inform Parma Municipal Court of any future changes of address, as well as any changes of my employment. Failure to disclose this information will result in Contempt of Court proceedings.

I understand that is my responsibility to bring this document, or to provide the Parma Municipal Court Cashiers with my case numbers in order to pay all cases correctly. The cashiers window accepts cash, credit cards (Visa, Mastercard, Discover, American Express), personal checks, money orders, and debit cards. We do take credit card payments by phone during business hours.

ALL CHECKS AND MONEY ORDERS ARE MADE OUT TO PARMA MUNICIPAL COURT.



Signature of Payment Officer

11-25-09

Date

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THE FOREGOING MOTION TO STAY WAS HAND DELIVERED TO HILLARY GOLDBERG, PROSECUTING ATTORNEY, CITY OF BROOKLYN, AT 7619 MEMPHIS AVE, BROOKLYN OHIO 44144 THIS 7TH DAY OF APRIL 2010

Anthony Kushlak

ANTHONY KUSHLAK
DEFENDANT-APPELLANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THE FOREGOING MOTION TO STAY WAS HAND DELIVERED TO THE PARMA MUNICIPAL COURT, AT 5555 POWERS BLVD, PARMA OHIO 44129. THIS 7TH DAY OF APRIL 2010.

Anthony Kushlak
ANTHONY KUSHLAK
DEFENDANT-APPELLANT