

**ORIGINAL**

IN THE SUPREME COURT OF OHIO

State ex rel. Anthony C. Christoff, et al., : CASE NO. 2011-0235  
: vs. Relators, :  
: Earle B. Turner, et al. :  
: Respondents. :  
:

---

STIPULATION AND AGREEMENT OF PARTIES PURSUANT  
TO S. CT. PRAC. R. 14.3(B)(2)(a) FOR AN EXTENSION OF TIME  
TO MARCH 14, 2011 FOR RESPONDENTS TO FILE THEIR  
RESPONSE TO RELATORS' COMPLAINT

---

Robert J. Triozzi (0016532)  
Director of Law

Gary S. Singletary (0037329)  
*Counsel of Record*  
Assistant Director of Law  
Mark Musson  
Assistant Director of Law  
City of Cleveland  
601 Lakeside Avenue- Room 106  
Cleveland, Ohio 44114-1077  
(216) 664-2737  
(216) 664-2663 (Fax)  
[gsingletary@city.cleveland.oh.us](mailto:gsingletary@city.cleveland.oh.us)  
[mmusson@city.cleveland.oh.us](mailto:mmusson@city.cleveland.oh.us)

Attorneys for Respondents

Paul M. Greenberger (0030736)  
*Counsel of Record*  
Timothy J. Duff (0046764)  
Jordan Berns (0047404)  
Berns, Ockner & Greenberger, LLC  
3733 Park East Drive - Suite 200  
Beachwood, Ohio 44122-4334  
(216) 831-8838  
(216) 464-4489 (Fax)  
[pgreenberger@bernssockner.com](mailto:pgreenberger@bernssockner.com)  
[tduff@bernssockner.com](mailto:tduff@bernssockner.com)  
[jberns@bernssockner.com](mailto:jberns@bernssockner.com)

Attorneys for Relators

**FILED**  
MAR 01 2011  
CLERK OF COURT  
SUPREME COURT OF OHIO

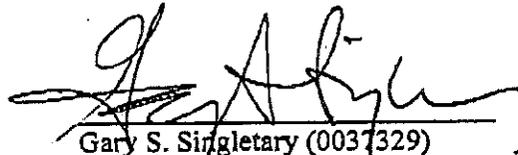
**STIPULATION AND AGREEMENT OF PARTIES PURSUANT  
TO S. CT. PRAC. R. 14.3(B)(2)(a) FOR AN EXTENSION OF TIME  
TO MARCH 14, 2011 FOR RESPONDENTS TO FILE THEIR  
RESPONSE TO RELATORS' COMPLAINT**

Counsel for the Respondents and Relators in this original action stipulate and agree, in conformance with S. Ct. Prac. R. 14.3(B)(2)(a), that the Respondents in this matter, Earle B. Turner, Brian Mahon, Verlin Peterson, the City of Cleveland, Sharon A. Dumas, and James Hartley, shall have an additional seven (7) days in which to file pursuant to S.Ct.Prac.R.10.5 an answer to the complaint or a motion to dismiss.

The new date agreed to by the parties for Respondents to file their response to Relators' Complaint is March 14, 2011. Counsel for the parties further stipulate and agree that Respondents will serve their response to the complaint on counsel for Relators by e-mail.

Respectfully submitted,

Robert J. Triozzi (0016532)  
Director of Law



Gary S. Singletary (0037329)  
*Counsel of Record*  
Assistant Director of Law  
Mark Musson (0081110)  
Assistant Director of Law  
City of Cleveland  
601 Lakeside Avenue- Room 106  
Cleveland, Ohio 44114-1077  
(216) 664-2737  
(216) 664-2663 (Fax)  
[gsingletary@city.cleveland.oh.us](mailto:gsingletary@city.cleveland.oh.us)  
[mmusson@city.cleveland.oh.us](mailto:mmusson@city.cleveland.oh.us)

Attorneys for Respondents

*Paul M. Greenberger* by *[Signature]*

Paul M. Greenberger (0090736)

*Counsel of Record*

Timothy J. Duff (0046764)

Jordan Berns (0047404)

Berns, Ockner & Greenberger, LLC

3733 Park East Drive - Suite 200

Beachwood, Ohio 44122-4334

(216) 831-8838

(216) 464-4489 (Fax)

[pgreenberger@bernsockner.com](mailto:pgreenberger@bernsockner.com)

[tduff@bernsockner.com](mailto:tduff@bernsockner.com)

[jberns@bernsockner.com](mailto:jberns@bernsockner.com)

(037/329)  
per consent 3/1/11

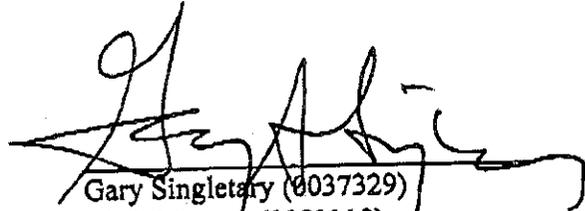
Attorneys for Relators

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the "Stipulation and Agreement of Parties Pursuant to S. CT. PRAC. R. 14.3(B)(2)(a) for an Extension of Time to March 14, 2011 for Respondents to File Their Response to Relators' Complaint" was served by telefax and regular U.S. Mail this 1<sup>st</sup> day of March 2011 to:

Paul M. Greenberger, Esq.  
Timothy J. Duff, Esq.  
Jordan Berns, Esq.  
Berns, Ockner & Greenberger, LLC  
3733 Park East Drive - Suite 200  
Beachwood, Ohio 44122-4334

Attorneys for Relators



Gary Singletary (0037329)  
Mark Musson (0081110)  
Attorney for Respondents