

**ORIGINAL**

**IN THE SUPREME COURT OF OHIO**

**STATE OF OHIO EX REL.  
DANIEL J. WILLIAMS**

**Appellant**

**vs.**

**HON. JON SIEVE, JUDGE  
HAMILTON COUNTY COURT OF  
COMMON PLEAS DIVISION OF  
DOMESTIC RELATIONS:**

**Appellee**

**The Supreme Court of Ohio  
Case No. 2011-0959**

**Hamilton County  
Court of Common Pleas  
Domestic Relations Division  
Case No. DR. 1001444**

**Hamilton County  
Court of Common Pleas  
Domestic Relations Division  
800 Broadway  
Cincinnati, OH 45202**

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**MOTION FOR RECONSIDERATION OF WRIT OF MANDAMUS**

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**Daniel J. Williams Jr  
PRO SE  
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Assistant Prosecuting Attorney  
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**COUNSEL FOR APPELLEE,  
HON. JON SIEVE, JUDGE  
HAMILTON COUNTY COURT  
OF COMMON PLEAS  
DOMESTIC RELATIONS**

**RECEIVED**  
**OCT 28 2011**  
**CLERK OF COURT  
SUPREME COURT OF OHIO**

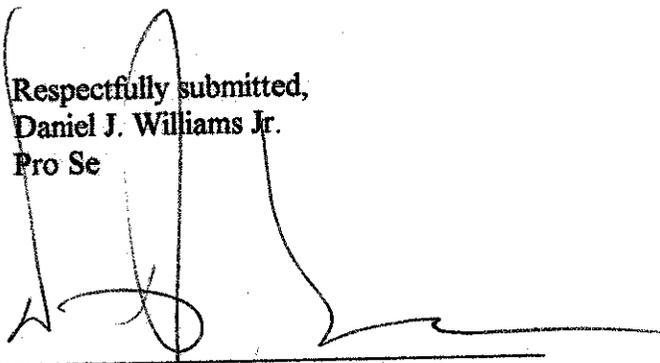
**FILED**  
**OCT 28 2011**  
**CLERK OF COURT  
SUPREME COURT OF OHIO**

COMES NOW, the Appellant, Daniel J. Williams Jr., by and through counsel, PRO SE, and moves this Court GRANT this motion for Reconsideration for Writ of Mandamus for Appellee, Judge Jon Sieve, regarding ruling on appeal from the Court of Appeals; C110179. Appellant represents to this Court that the Appellant has reason to fear and does fear that, unless restrained by this Court, Judge Jon Sieve will continue to exhibit bias and abuse of discretion in the divorce proceedings of Appellant.

The Supreme Court of Ohio judgment entry dated October 18, 2011 should be reconsidered in that the merits of the case are being ignored. Again, the appellant's premise is not about abuse of judicial discretion but fundamental federal and state statutory due process of law and equal protection of law regarding trial proceedings, evidence and rulings. This Court's judgment appears to be removed from this perspective and focused strictly on the right of judicial discretion. Presently in Hamilton County Court of Common Pleas, the Cincinnati Enquirer suit against Judge Nadine Allen to have sealed records in a lawsuit made publicly available has compelled the judge to unseal the record. The foundational premise of the Enquirer attorney's argument is that there was never a hearing and evidence presented for or against sealing of record before Judge Nadine Allen's ruling and action as evident by transcript proceeding. Similarly, in this case there was never a hearing and evidence presented before the appellee's ruling and action even though there was a scheduled hearing for said issue. An issuance of a writ of mandamus will promote the spirit and letter of the law in that this is a nation of the rule of law and not the rule of men. Lastly, a question the appellant has asked before and will continue to ask as long as there is bias and abuse of discretion is whether this is 2011 and the court of Judge Jon Sieve or 1857 and the court of Chief Justice Roger Taney and the Dred Scott case before the legislation of the 14<sup>th</sup> Amendment of the U.S. Constitution and the O.R.C. statutes concerning due process, equal protection of the law, evidence, marriage, divorce in which a Black man has no rights that a white man needs to respect? Thus far in this case, it continues to be the latter rather than the former.

WHEREFORE, Appellant prays for relief from this Court in the following form: that the Appellant be Granted a Writ of Mandamus issuance for Appellee, Judge Jon Sieve, to follow federal and state due process procedural law and equal protection of the law and have hearing to take into consideration oral argument and evidence in Motion for Disqualification of Magistrate before making a determination on issue.

Respectfully submitted,  
Daniel J. Williams Jr.  
Pro Se

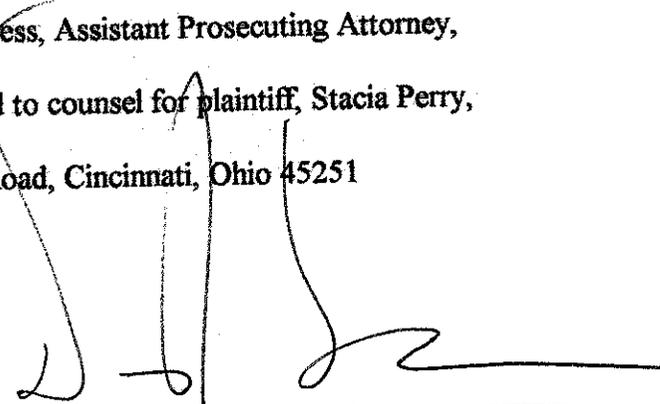


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Daniel J. Williams Jr  
Pro Se

Certificate of Service

I certify that a copy of this Reconsideration for Writ of Mandamus was sent by ordinary U.S. Mail to counsel for appellee, Charles W. Anness, Assistant Prosecuting Attorney, 230 East Ninth Street, Cincinnati, Ohio 45202 and to counsel for plaintiff, Stacia Perry, Karl Kilguss, Attorney at Law, 3515 Springdale Road, Cincinnati, Ohio 45251 on 27<sup>th</sup> day of October, 2011.



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Daniel J. Williams Jr  
Pro Se