

ORIGINAL

Case No. 2012-0131

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**Supreme Court  
of the State of Ohio**

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STATE OF OHIO *ex rel.*  
KENT LANHAM,

Relator,

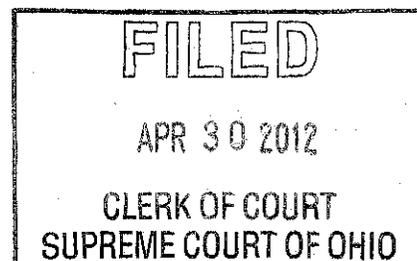
v.

DANNY R. BUBP, Putative State Representative,

Respondent.

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*Original Action in Mandamus*



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RELATOR'S MEMORANDUM IN OPPOSITION  
TO REPENDENT BUBP'S MOTION TO STRIKE

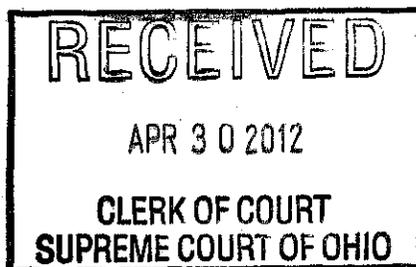
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**SUPREME COURT  
OF THE STATE OF OHIO**

<b>STATE OF OHIO <i>ex rel.</i> KENT LANHAM,</b>	:	<b>Case No. 2012-0131</b>
	:	
<b>Relator,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>DANNY R. BUBP,</b>	:	<b>RELATOR’S MEMORANDUM IN</b>
<b>Putative State Representative,</b>	:	<b>OPPOSITION TO RESPONDENT</b>
	:	<b>BUBP’S MOTION TO STRIKE</b>
<b>Respondent.</b>	:	

Comes now the State of Ohio, by and on relation to Kent Lanham (“Relator”), and hereby tenders the following memorandum in opposition to Respondent Bubb’s Motion to Strike. The Motion is clearly without merit. The allegations in the Verified Complaint have a specific bearing on the subject matter of this litigation – from the context and background of the creation of the underlying public records and the public records request to providing the necessary evidentiary support for the Relator’s claim for an award of statutory attorney fees. As developed in the memorandum in below, the Motion should be denied.

**MEMORANDUM IN OPPOSITION**

“[M]otions to strike are disfavored and rarely used in Federal practice, and are sustained only when it appears that the matter sought to be stricken has no possible bearing on the subject matter of the litigation and would be prejudicial to the moving party.” *F. E. Longstreth Co. v. Charles Vangrov & Son, Inc.*, 27 Ohio Misc. 15, 17, 265 N.E.2d 843, 845 (1970); accord *Frisby v. Keith D. Weiner & Associates Co., LPA*, 669 F.Supp.2d 863, 865 (N.D. Ohio 2009); see *Greenwich Ins. Co. v. Rodgers*, 729 F.Supp.2d 1158, 1162 (C.D.Cal.2010)(noting that motions to strike are generally regarded with disfavor “because they are often used as a delaying tactic”);

5C Wright & Miller, Federal Prac. & Proc. (2004 ed.), §1380, at 394 (“because striking a portion of a pleading is a drastic remedy and because it is often sought by the movant simply as a dilatory or harassing tactic, numerous judicial decision make it clear that motions under Rule 12(f) are view with disfavor by the federal courts and are infrequently granted”). Yet, even Mr. Bulp implicitly acknowledges that the allegations concerning his illegal and unconstitutional holding of the public offices of state representative and mayor’s court magistrate do have a bearing on the subject matter of the litigation – for they provide the background and context of the underlying public records and the public records request, as well as establishing the public interest and public benefit to justify any discretionary award of attorney fees.<sup>1</sup>

“Ohio generally follows notice, rather than fact, pleading’ except in certain special circumstances in which [this Court] [has] modified the standard by requiring the pleading of specific facts.” *State ex rel. Cincinnati Enquirer v. Ronan*, 124 Ohio St.3d 17, 918 N.E.2d 515, 2009-Ohio-5947 ¶7 (quoting *State ex rel. Williams Ford Sales, Inc. v. Connor*, 72 Ohio St.3d 111, 113 (1995)). For “[w]hile Civ.R. 8(A) generally requires only notice pleading, S. Ct. Prac. R. [10.4(B)] modifies that standard by mandating the pleading of specific facts rather than unsupported conclusions in original actions filed in this court.” *State ex rel. Master v. Cleveland*, 75 Ohio St.3d 23, 26, 661 N.E.2d 180, 183, 1996-Ohio-228.<sup>2</sup>

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<sup>1</sup> Because this public records mandamus action was brought only after Mr. Bulp ignored the Relator’s public records request for over 2 months, *i.e.*, he failed to respond affirmatively or negatively to the public records request, Relator believes that an award of attorney fees are mandatory in this case pursuant to R.C. § 149.43(C)(2)(b)(i). See Verified Complaint ¶65. However, Relator has pled in the alternative that “if such an award in this case is still considered to be discretionary” a sufficient public benefit and public interest exists to justify such an award. See Verified Complaint ¶¶66 *et seq.*

<sup>2</sup> Mr. Bulp fails to acknowledge that S.Ct.Prac.R. 10.4(B) actually “modifies” the notice pleading standard of Ohio R. Civ. P. 8(A). Instead, Mr. Bulp posits that S. Ct. Prac. R. 10.4(B) simply “adds” to the requirements of notice pleading. (Motion, at 2-3.) As the foregoing cases

S Ct. R. Prac. 10.4(B) mandates that:

All complaints shall contain a specific statement of facts upon which the claim for relief is based [and] shall be supported by an affidavit specifying the details of the claim.

Thus, in commencing an original action, not only must a “specific statement of facts” be tendered but also an affidavit (or, in this case, a verified complaint) which “specif[ies] the details” of the claims being asserted.<sup>3</sup> In this case, Relator appropriately sets forth fully the facts and details of all of his claims, not just the singular claim to which Mr. Bulp attempts to limit this case.

### **Three Separate and Distinct Claims Are Sought in a Public Records Mandamus Action**

Mr. Bulp’s entire motion proceeds from the false and erroneous contention that Relator seeks a singular claim for relief, *viz.*, a writ of mandamus to obtain public records. (Motion, at 3.) For in this action, as generally in all public records mandamus actions, Relator has asserted three different claims: (i) a claim for the issuance of a writ of mandamus; (ii) a claim for an award of statutory damages; and (iii) a claim for an award of attorney fees.<sup>4</sup>

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from this Court declare, the pleading in an original action is governed by S. Ct. Prac. R. 10.4(B), not Ohio R. Civ. P. 8(A).

<sup>3</sup> Mr. Bulp’s motion does not even meet the standard for a motion to strike in federal courts, *i.e.*, the matter sought to be stricken has no possible bearing on the subject matter of the litigation and would be prejudicial to the moving party. Because federal courts assess motions to strike only in light of the notice pleading standard and Mr. Bulp cannot meet that standard with respect to the present motion, then *a fortiori* Mr. Bulp cannot meet that standard in this case where the pleading standard is not notice pleading but one that requires the Relator to plead “specific statement[s] of facts” and to “specif[y] the details” of the claims being asserted.

<sup>4</sup> Naturally, if a person does not transmit the a public records request in writing and via hand delivery or certified mail, that person would not be entitled to bring a claim for statutory damages. *See* R.C. § 149.43(C)(1).

For this Court has repeatedly recognized, in public record mandamus actions, that a claim for award of attorney fees is separate and distinct from the claim for the issuance of a writ of mandamus. This situation arises most often when the public office or person responsible for the public records produces all of the requested records but only after the commencement of the mandamus action. *E.g., State ex rel. Cincinnati Enquirer v. Heath*, 121 Ohio St.3d 165, 902 N.E.2d 976, 2009-Ohio-590 ¶18 (“even if the Enquirer’s *mandamus claim* were properly dismissed as moot, a *claim for attorney fees* in a public-records mandamus action is not rendered moot by the provision of the requested records after the case has been filed” (emphases added)); *State ex rel. Data Trace Information Services, L.L.C. v. Cuyahoga County Fiscal Officer*, 131 Ohio St.3d 255, 963 N.E.2d 1288, 2012-Ohio-753 ¶69 (“[a]lthough relators requested attorney fees and statutory damages in their amended complaint and reiterated their request in the conclusion of their merit briefs, they included no separate argument in either brief concerning their request. Relators thus waived *this claim*” (emphasis added)); *State ex rel. Cincinnati Enquirer v. Ronan*, 124 Ohio St.3d 17, 918 N.E.2d, 2009-Ohio 5947 ¶12 (Stratton, J., concurring in part and dissenting in part)(“because I believe that the Enquirer’s complaint lacked merit, I would also dismiss *the claim for attorney fees*” (emphasis added)). And outside of the context of public records cases, this Court has also recognized that the seeking of an award of attorney fees constitutes one of the claims of a party. *E.g., International Bhd. of Elec. Workers Local Union No. 8 v. Vaughn Indus., L.L.C.*, 116 Ohio St.3d 335, 879 N.E.2d 187, 2007–Ohio–6439 ¶17 (holding that “when attorney fees are requested in the original pleadings, an order that does not dispose of *the attorney-fee claim* . . . is not a final, appealable order” (emphasis added)).

Thus, Mr. Bulp’s attempt to recast and severely limit the claims in this case is disingenuous. There are three different claims being pursued and S. Ct. R. Prac. 10.4(B) requires

the pleading of sufficient facts for all claims; sufficient facts were properly pled for all three claims, including the claim for attorney fees.

**This Court Considers a Relator's Entitlement to a Writ of Mandamus At the Same Time That It Considers Entitlement to an Award of Attorney Fees; Accordingly, Allegations (and the Development of Evidence) Concerning the Public Benefit and Public Interest Relative to an Award of Attorney Fees Is Appropriate**

In the Motion, Mr. Bubp clearly acknowledges that the allegations concerning his holding the public offices of state representative and mayor's court magistrate are pertinent to the public interest and public benefit criteria that this Court utilizes in determining whether a discretionary award of attorney fees is warranted pursuant to the Public Records Act. (Motion, at 6.) Yet, Mr. Bubp proceeds to posit an argument that proceeds *ab initio* from a fundamental misunderstanding as to how this Court proceeds in original actions. For contrary to the argument of Mr. Bubp, this Court does not bifurcate the issue of a relator's entitlement *vel non* to the issuance of a writ of mandamus from a relator's entitlement *vel non* to an award of attorney fees; for this Court considers at the same time a relator's entitlement to the issuance of a writ of mandamus and entitlement to an award of attorney fees.<sup>5</sup>

Once the pleadings are completed in an original action, this Court will undertake one of three actions: (i) dismiss the case; (ii) issue a peremptory writ; or (iii) issue an alternative writ.

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<sup>5</sup> Once this Court concludes that a relator is entitled to an award of attorney fees, this Court does bifurcate the resolution of the amount of an award. *See, e.g., State ex rel. Dispatch Printing Co. v. Morrow Cty. Prosecutor's Office*, 105 Ohio St.3d 172, 824 N.E.2d 64, 2005-Ohio-685 ¶19 (“[t]he Dispatch is also entitled to attorney fees. . . . We order the Dispatch's counsel to submit a bill and documentation of evidence in support of its request for attorney fees”); *State ex rel. Rasul-Bey v. Onunwor*, 94 Ohio St.3d 119, 122, 760 N.E.2d 421, 2002-Ohio-67 (“[relator] is also entitled to an award of attorney fees. We order [relator's] counsel to submit a bill and documentation”); *State ex rel. Freedom Communications, Inc. v. Elida Community Fire Co.*, 82 Ohio St.3d 578, 582, 697 N.E.2d 210, 1998-Ohio-411 (“[w]e also find that attorney fees are appropriate here and order [relator's] counsel to submit a bill and documentation in support of its request for attorney fees”). For there is a distinct difference between resolving entitlement to fees versus the amount of such fees.

S. Ct. R. Prac. 10.5(C). As claims of attorney-client privilege necessitate the submission and consideration of evidence and ultimate resolution of that mixed question of fact and law, this case necessarily will proceed with the issuance of either a peremptory writ or an alternative writ. In either situation, the merits of all claims (not just a single claim) are resolved by this Court.

“[I]f the pertinent facts are uncontroverted and it appears beyond doubt that [the relator] is entitled to the requested writ, we will issue a peremptory writ of mandamus.” *State ex rel. Highlander v. Rudduck*, 103 Ohio St.3d 370, 816 N.E.2d 213, 2004-Ohio-4952 ¶8. But in issuing peremptory writs in public records mandamus actions, this Court has concurrently awarded attorney fees to the relators. *E.g.*, *State ex rel. Dispatch Printing Co. v. Morrow Cty. Prosecutor's Office*, 105 Ohio St.3d 172, 824 N.E.2d 64, 2005-Ohio-685 (2005)(in a public records case, court issued a peremptory writ and, in that same decision which was based solely upon the allegations in the pleadings, court awarded attorney fees); *State ex rel. Kim v. Wachenschwanz*, 93 Ohio St.3d 586, 757 N.E.2d 367, 2001-Ohio-1616 (2001)(same); *State ex rel. Youngstown City School Dist. Bd. of Edn. v. Youngstown*, 84 Ohio St.3d 51, 701 N.E.2d 986, 1998-Ohio-501 (same); *see State ex rel. The Toledo Blade Co. v. Hancock Cty. Bd. of Comm'rs*, 79 Ohio St.3d 1486, 683 N.E.2d 789 (1997) (Pfeiffer, J., dissenting)(would award peremptory writ and attorney fees).

When this action was commenced, Mr. Bulp had failed to respond whatsoever to the Realtor's public records request in over 2 months; thus, Mr. Bulp had implicitly refused to produce any public records in response to the request. Thus, at the time the Verified Complaint was filed, Relator was arguably entitled to the issuance of a peremptory writ and an award of attorney fees. In order to demonstrate entitlement to the latter (if the Court proceeded by considering such an award to be discretionary and not mandatory), Relator had to include

allegations concerning the public benefit and public interest of the requested records. To have failed to do otherwise, Relator would have risked the summary denial of his claim for attorney fees; thus, the inclusion of allegations concerning Mr. Bulp illegally and unconstitutionally serving in two public offices was clearly appropriate and necessary.

But even in the context of the issuance of an alternative writ, allegations and evidentiary support concerning Mr. Bulp's illegal and unconstitutional service in two public offices are still appropriate. Whereas a peremptory writ issues when it appears beyond doubt that the relator is entitled to the requested writ, an alternative writ of mandamus will issue if it appears that the claims may have merit. *State ex rel. Morenz v. Kerr*, 104 Ohio St.3d 148, 818 N.E.2d 1162, 2004-Ohio-6208 ¶13. In that instance, "the [Court] will issue a schedule for the presentation of evidence and the filing and service of briefs or other pleadings." S. Ct. Prac. R. 10.6. However, contrary to the apparent belief of Mr. Bulp, the evidence and briefing is not limited to the relator's entitlement to a writ of mandamus which finally compels a public official to comply with his or her legal duty; for simultaneously with the consideration of the merits on the issuance *vel non* of the writ, this Court also considers the relator's entitlement to attorney fees. In fact, if a relator does not develop the evidence and sufficient briefing on entitlement to attorney fees at the same time as addressing the entitlement to the issuance of the requested writ, the claim for attorney fees would be considered to have been waived. *State ex rel. Data Trace Information Services, L.L.C. v. Cuyahoga County Fiscal Officer*, 131 Ohio St.3d 255, 963 N.E.2d 1288, 2012-Ohio-753 ¶69 (after issuing alternative writ, the parties submitted evidence and briefing; when the Court then issued a writ of mandamus, it denied attorney fees and statutory damages because "[a]lthough relators requested attorney fees and statutory damages in their amended complaint and reiterated their request in the conclusion of their merit briefs, they included no

separate argument in either brief concerning their request. Relators thus waived this claim”); *State ex rel. Mun. Constr. Equip. Operators’ Labor Council v. Cleveland*, 114 Ohio St.3d 183, 870 N.E.2d 1174, 2007-Ohio-3831 ¶83 (after issuing alternative writ and submission of evidence and briefing, “[a]lthough relators requested attorney fees in their complaint, they did not include any argument in support of this relief in their merit brief. Relators thus waived this claim”); *State ex rel. Morgan v. New Lexington*, 112 Ohio St.3d 33, 857 N.E.2d 1208, 2006-Ohio-6365 ¶58 (“Morgan also requests attorney fees. We deny Morgan's request because she has not established a sufficient *public* benefit”); *State ex rel. Multimedia, Inc. v. Snowden*, 72 Ohio St.3d 141, 145, 647 N.E.2d 1374, 1995-Ohio-248 (“Multimedia must demonstrate a sufficient benefit to the public to warrant an award of attorney fees”).<sup>6</sup>

Thus, because this Court requires evidence and briefing on both a relator’s entitlement to a writ of mandamus and the relator’s entitlement to an award of attorney fees, allegations and evidence addressing the public interest and public benefit underlying the requested public records is appropriate. Contrary to the suggestion (or misunderstanding) of Mr. Bulp, this Court does not bifurcate those two issues in original actions.

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<sup>6</sup> The foregoing and well-established case law of this Court demonstrates the absurdity of Mr. Bulp’s argument that this Court should make some “tentative decision regarding the award of fees.” (Motion, at 6.) In essence, the position of Mr. Bulp is that no evidence supporting a claim of entitlement to attorney fees should even be alleged or developed prior to the Court’s ultimate resolution of entitlement *vel non* to a writ of mandamus compelling compliance with the Open Records Act. Only after the writ is ultimately issued, according to Mr. Bulp, the Court should then make its “tentative decision” on the award of attorney fees; but if, at this stage, no evidence has been developed to support an award of attorney fees, then it begs the question as to what is the Court to rely upon in making this “tentative decision”? But as the above demonstrate, this Court does not proceed in such a manner. Resolution of entitlement *vel non* to an award of attorney fees is considered at the same time that this Court resolves a relator’s entitlement *vel non* to a writ of mandamus.

**Allegations Concerning Mr. Bulp Illegally Holding Two Public Offices Provides the Background and Context for Both the Creation of the Underlying Public Records and the Request for Such Records**

Besides the allegations and evidence concerning Mr. Bulp illegally and unconstitutionally holding two public offices being relevant and pertinent to an award of attorney fees, such allegations also provide the context and background for both the creation of responsive public records, as well as the public records request itself. “Where allegations, when read with the complaint as a whole, give a full understanding thereof, they need not be stricken.” *LeDuc v. Kentucky Cent. Life Ins. Co.*, 814 F.Supp. 820, 830 (N.D. Cal. 1992); *accord Bloombury Woolen Company v. Moosehead Woolen Mills*, 109 F.Supp. 804, 806 (D. Me. 1953). *Ex nihilo nihil fit* – out of nothing, nothing comes. The creation of public records does not arise out of a vacuum or a void nor do requests for public records arise out of a vacuum or a void.

In seeking to strike all allegations in the Verified Complaint that address in any manner the undisputable fact that Mr. Bulp is illegally and unconstitutionally holding the public offices of state representative and mayor’s court magistrate, Mr. Bulp ignores the underlying public records request itself and the fact that responsive public records actually were created by the government or a public official. There had to be some reason or issue for the creation of responsive public records in the first place; the genesis for the creation of the public records provides the context and background of this action, as well as now going to the validity *vel non* of Mr. Bulp’s claim that certain responsive records are being withheld based upon a claim of attorney-client privilege.

In the public records requests directed to Mr. Bulp and underlying this case, Relator sought four categories of records, all of which specifically concerned “the authority or ability for [Mr. Bulp] to simultaneously hold the public offices of state representative and a magistrate in a

mayor's court." (Verified Complaint, Exh. A.) If no responsive records existed, then the response to Relator's public records request could have been a simple matter of so declaring. *See State ex rel. Fant v. Mengel*, 62 Ohio St.3d 197, 580 N.E.2d 1085 (1991)(no duty to produce public records when the public records do not exist). In this case, though, there indisputably were public records responsive to Relator's request, *i.e.*, public records that were previously created by the government or public officials that addressed "the authority or ability for [Mr. Bubp] to simultaneously hold the public offices of state representative and a magistrate in a mayor's court." Thus, by providing the background and history concerning this issue, including the news broadcast in October 2009 that publicly aired the fact that Mr. Bubp was simultaneously holding two public offices and that doing so was illegal (*see* Verified Complaint ¶¶29-47), the Relator was able to provide the context in which public records responsive to Relator's request were likely created.<sup>7</sup> And as has been proven since the commencement of this action, responsive public records were, in fact, created during this time frame. Thus, any allegations and evidence concerning Mr. Bubp simultaneously holding two public offices

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<sup>7</sup> Of course, when this action was commenced, Mr. Bubp had failed to produce any responsive public records (for he had ignored the public records request for over 2 months). Since the commencement of this action, Mr. Bubp has indicated that he is refusing to produce responsive records based upon his *ipse dixit* that such records are exempt from disclosure based upon attorney-client privilege. Thus, in the present posture of this action, the context and background by which the withheld records came into being become all the more relevant and pertinent for the issue of whether the withheld records, in fact, are properly being withheld *in toto* due to attorney-client privilege or whether the withheld records were more for political purposes in response to the news report concerning Mr. Bubp simultaneously holding two public offices.

In identifying the responsive public records which are being withheld under a claim of attorney-client privilege, Mr. Bubp has identified a total of seven documents consisting of a total of thirty-one pages. (*See* Lesperance Affidavit, Exh. H., attached to the Motion for Protective Order (filed on April 16, 2012).) Interestingly, all seven of these documents were created in October 2009 soon after the television news report aired.

provide important background and context to the creation (or potential creation) of responsive public records, as well as the public records request itself.

Additionally, as this Court recognized in *Kish v. Akron*, 109 Ohio St.3d 162, 846 N.E.2d 811, 2006-Ohio-1244, “[p]ublic records are one portal through which the people observe their government, ensuring its accountability, integrity, and equity while minimizing sovereign mischief and malfeasance.” *Id.* ¶16. And while a requester’s purpose in seeking public records is irrelevant, *Consumer News Serv., Inc. v. Worthington City Bd. Of Educ.*, 97 Ohio St.3d 58, 2002-Ohio-5311 ¶45, the tendering of a public records requests, just like the creation of the public records themselves, does not arise out of a vacuum or a void. For there are various reasons and impetuses which lead an individual to seek public records and which provide the context of the request.

For example, at times, some public event or controversy precipitates the genesis of the request and an ensuing public records mandamus action. *See, e.g., State ex rel. Beacon Journal Publishing Co. v. Maurer*, 91 Ohio St.3d 54, 741 N.E.2d 511, 2001-Ohio-282 (public records request sought incident report that was created as the result of a police shooting); *State ex rel. Cincinnati Enquirer v. Hamilton Cty.*, 75 Ohio St.3d 374, 662 N.E.2d 334, 1996-Ohio-214 (public records request sought telephone recordings by which police received a 911 call concerning a shooting were by aby which police were dispatched to a murder scene).

Other times, a public records request arises from a citizen’s effort to provide oversight to and accountability of public officials. *See, e.g., State ex rel. Cincinnati Enquirer v. Krings*, 93 Ohio St.3d 654, 660, 2001-Ohio-1895 (public records request concerning cost-overrun of construction of sports stadia); *State ex rel. Calvary v. Upper Arlington*, 89 Ohio St.3d 229, 729 N.E.2d 1182, 2000-Ohio-142 (citizen’s public records request sought proposed collective

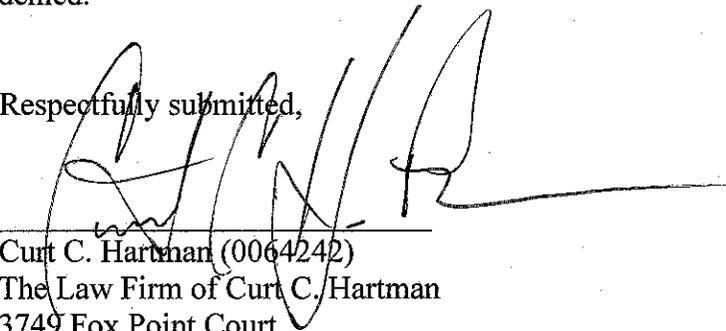
bargaining agreement being considered by city council in advance of city council vote on approving the agreement); *State ex rel. Glasgow v. Jones*, 119 Ohio St.3d 391, 894 N.E.2d 686, 2008 -Ohio- 4788 (citizen's public records request sought records of state representatives communications, including communications concerning H.B. No. 151 and the divestiture of investments in Iran and Sudan); *State ex rel. Rea v. Ohio Dept. of Ed.*, 81 Ohio St.3d 527, 692 N.E.2d 596, 1998-Ohio-334 (public records request for previously administered statewide standardized test, including proficiency tests); *State ex rel. Multimedia, Inc. v. Snowden*, 72 Ohio St.3d 141, 647 N.E.2d 1374, 1995-Ohio-248 (public records request for personnel background and investigation reports, including criminal and traffic records, for all members of city's then current police recruit classes). And while a person's purpose or motive in making a public records request is irrelevant, having the context and background in which the request arose provides further information concerning the public interest and public benefit to be served.

While the ultimate issue in any public records case centers on the availability of the requested records, the underlying events giving rise to both the creation of the disputed public records and the public records request provides context and pertinent background. Contrary to the suggestion of Mr. Bulp, public records and request for such records do not spring forth out of nothingness. The general grievances that Mr. Bulp may have with certain allegations in the Verified Complaint appropriately place in context the public records at issue, as well as the public records request.

## Conclusion

As set forth above, the allegations and evidence provided by the Verified Complaint have a specific bearing on all of the claims brought in this action – from the context and background of the creation of the underlying public records and the public records request to providing the necessary evidentiary support for the Relator’s claim for an award of statutory attorney fees. Such allegations were made, in fact, in conformity with the pleading requirements of this Court. Mr. Bubp has not and cannot establish his burden to justify the striking of any allegations. Accordingly, the Motion to Strike should be denied.

Respectfully submitted,

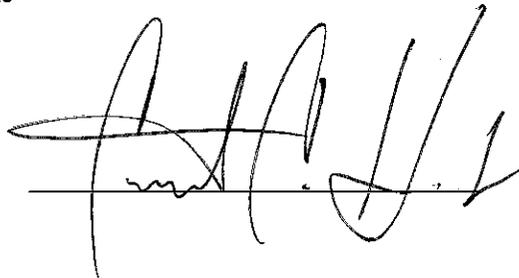


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## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via e-mail and via regular mail, on the 28th day of April 2012, upon the following:

Jeff Clark  
Jeannine Lesperance  
Office of the Ohio Attorney General Mike DeWine  
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