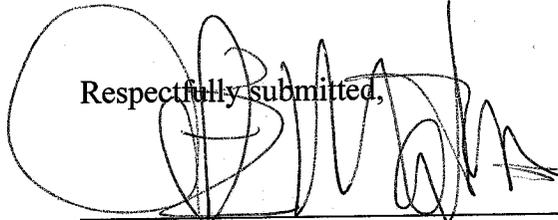


MEMORANDUM IN SUPPORT

This Court issued its Order to Show Cause on the above-entitled action on December 19, 2012. On January 16, 2013, Respondent's counsel filed a Motion to Withdraw from the above-entitled action because Respondent has not met the terms of engaging him further to represent her before this Court. Respondent is presently incarcerated.

Depending upon whether the Court grants the Motion to Withdraw or not, Respondent or the undersigned will need additional time to file the Answer Brief. Accordingly, Respondent's counsel requests that his Motion to Withdraw be granted and requests an additional 14 days for Respondent to respond with her Answer Brief in the above-entitled action.

Respectfully submitted,



Alvin E. Mathews, Jr. (0038660)

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*Counsel for Respondent
Agatha Martin Williams*

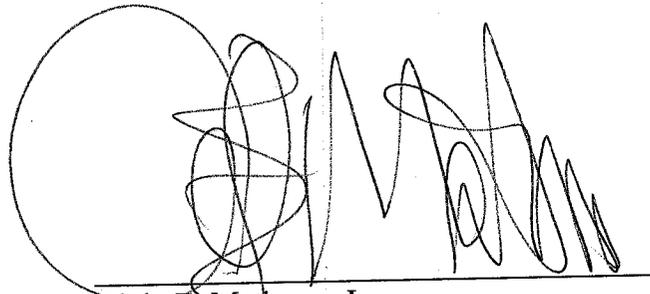
CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Respondent's Motion For Extension of Time For Answer Brief was served upon the following via U.S. mail, postage prepaid, this 2nd day of January, 2013.

Richard S. Milligan, Esq.
Milligan Pusateri
4684 Douglas Circle NW
Canton, Ohio 44735-5459

Dimitrios S. Pousoulides, Esq.
931 N. Main Street, Suite 201
North Canton, Ohio 44720

Agatha Martin Williams
Prisoner # W085056
Ohio Reformatory for Women
1479 Collins Avenue
Marysville, OH 43040

A handwritten signature in black ink, appearing to read 'Alvin E. Mathews, Jr.', written over a horizontal line. The signature is highly stylized and cursive.

Alvin E. Mathews, Jr.