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SUPREME COURT OF OHIO

THE SUPREME COURT OF OHIO

LORAIN COUNTY BAR ASSOC. )

CASE NO. 2013-0072

Relator, )

RELATOR'S MOTION TO  
STRIKE IN PART RESPONDENTS'  
"WAIVER OF ORAL ARGUMENT  
ON BRIEF"

vs. )

KING AYETTEY ZUBAIDAH, )  
fka GERALD McGEE, ET AL. )

Respondents. )

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Now comes Relator, Lorain County Bar Association, by and through the undersigned Bar Counsel, and respectfully moves this Honorable Court to Strike in part from the record Respondents' "Waiver of Oral Argument on Brief."

For cause, Relator states that the pleading at issue does more than simply serve notice that Respondents are waiving their right to appear at oral argument, currently scheduled for Wednesday, May 8, 2013. (Pursuant to S.Ct.Prac. R. 17.03(C), Relator intends to appear and argue.)

In addition to the "Waiver," Respondents have filed what appears to be a summary of their position and/or a written "preview" of what their argument would be, if they were to appear.

Nowhere in the Rules of Practice of the Supreme Court of Ohio is there a

provision, rule, or procedure for a party to submit a written summary of its oral argument

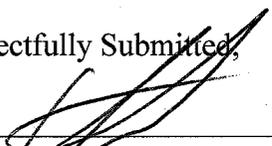
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in lieu of actually appearing at court. Relator certainly has no objection to Respondents appearing in court to argue, nor does Relator care if Respondents waive their right to appear; however, Respondents should not be heard to submit their “argument” to the court via a written pleading.

Accordingly, Relator respectfully requests that the court strike all of the surplusage from Respondent’s “Waiver of Oral Argument on brief” and treat the pleading as a simple “Notice of Waiver of Oral Argument” pursuant to S.Ct.Prac.R. 17.03(A).

Parenthetically, Relator would respectfully remind the court that this is an UPL case. Interestingly, The King, a layperson, has filed this pleading on behalf of *both* himself individually and on behalf of the second Respondent, Stand, Inc.

Respectfully Submitted,



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**D. CHRIS COOK, #0061073**

The Commons

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Bar Counsel - Attorney for Relator

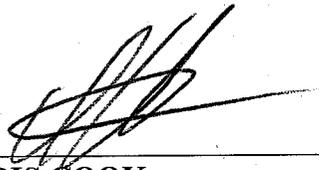
**PROOF OF SERVICE**

This is to certify that a copy of the foregoing Motion was sent to the following by way of Regular U.S. Mail this 29<sup>th</sup> day of April, 2013:

King Ayettey Zubaidah  
1623 West 22<sup>nd</sup> Street  
Lorain, Ohio 44052  
Respondent

STAND, Inc.  
1623 West 22<sup>nd</sup> Street  
Lorain, Ohio 44052  
Respondent

Minerva Elizaga  
Board on Unauthorized Practice of Law  
The Supreme Court of Ohio  
65 S. Front Street, 5<sup>th</sup> Floor  
Columbus, Ohio 43215



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**D. CHRIS COOK**  
Bar Counsel - Attorney for Relator