

## IN THE SUPREME COURT OF OHIO

STATE OF OHIO, : No. 2012-2156  
Appellee, :  
v. : On Appeal from the  
CHRISTOPHER RICHMOND, : Cuyahoga County Court of Appeals,  
Appellant. : Eighth Appellate  
District, Case No. 97531

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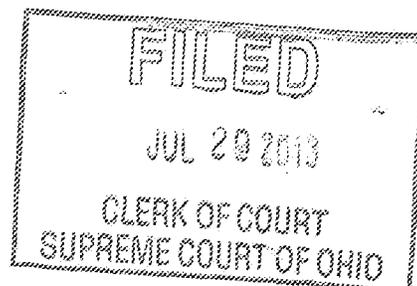
APPELLANT'S RESPONSE TO APPELLEE'S MOTION TO CONSOLIDATE APPEALS

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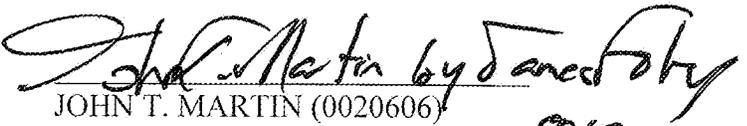
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Appellant, through undersigned counsel, objects to the State of Ohio's motion, that seeks consolidation of the oral arguments in *State v. Amos*, Case No. 2012-2093, and *State v. Richmond*, Case No. 2012-2156. It should be noted that counsel for Messrs. Amos and Richmond are filing identical responses in this regard.

The State correctly notes that the two cases present issues before this Court that may well be indistinguishable from each other. Combining the two cases into a single argument, however, presents a logistical problem because the State of Ohio is both appellee (in *Amos*) and appellant (in *Richmond*). Accordingly, hearing separate arguments on the same day is appropriate and Messrs. Amos and Richmond urge this Court to do so.

Respectfully submitted,

  
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Counsel for Christopher Richmond  
Appellant  
0069895  
per authorization  
7/29/13

**CERTIFICATE OF SERVICE**

I hereby certify that one true copy of the foregoing was served via U.S. mail upon Kristen Sobieski, counsel of record for the State of Ohio, on this 29th day of July, 2013.

*John T. Martin* by *James Foley*  
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*per authorization*  
*7/29/13*