

IN THE SUPREME COURT OF OHIO

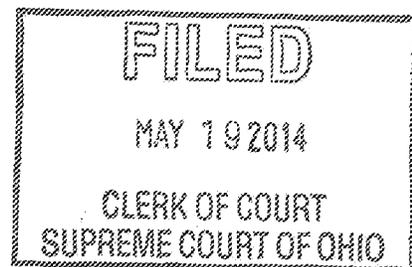
State ex rel. Janice M. Conway, :  
 Relator, : Case No. 14-0252  
 v. :  
 Franklin County :  
 Prosecutor's Office, et al., :  
 Respondents. :

ANSWER OF RESPONDENT FRANKLIN COUNTY  
COURT OF COMMON PLEAS

Now comes Respondent Franklin County Court of Common Pleas, by and through counsel, and for its Answer to the Complaint, states as follows:

FIRST DEFENSE

1. In response to the preamble paragraph of the Complaint, Respondent admits that Relator has brought this action to compel the production of documents Relator believes to be public records. The remaining allegations contained in the preamble paragraph of the Complaint contain legal conclusions to which a response is not required. To the extent a response is required, Respondent denies same.
2. Respondent denies for want of sufficient knowledge or information the allegations contained in Paragraphs 1, 3, 4, 5, 6, 7, 8, 10, 11, 12, and 13 of the Complaint and any and all subparts contained therein.
3. In response to Paragraphs 2 and 9 of the Complaint, Respondent avers that the documents speak for themselves and denies any and all remaining allegations.



4. Paragraph 14 of the Complaint contains allegations that do not require a response from Respondent. To the extent a response is required, Respondent denies same.

In response to Wherefore clause of the Complaint, Respondent denies that Relator is entitled to any of the relief requested therein or to any relief whatsoever.

#### **SECOND DEFENSE**

5. Respondent denies any and all allegations not expressly admitted herein.

#### **THIRD DEFENSE**

6. The Complaint, either in whole or in part, fails to state a claim upon which relief may be granted.

#### **FOURTH DEFENSE**

7. The Franklin County Court of Common Pleas is not *sui juris*.

#### **FIFTH DEFENSE**

8. Respondent did not act, or fail to act, in any way that proximately caused any injury to Relator.

#### **SIXTH DEFENSE**

9. Respondent did not willfully, wantonly, intentionally, recklessly, or negligently cause any injury to Relator.

#### **SEVENTH DEFENSE**

10. Respondent has no actual, implied, imputed or any other knowledge of any wrongs committed, if such exist.

**EIGHTH DEFENSE**

11. The Franklin County Court of Common Pleas is not the Keeper of Records for the Franklin County Prosecutor's Office.

**WHEREFORE**, having fully answered, Respondent respectfully moves this Court for an order dismissing the present action, for costs and, upon successful defense of this action, for such other relief as this Court may deem equitable.

Respectfully submitted,

**RON O'BRIEN  
PROSECUTING ATTORNEY  
FRANKLIN COUNTY, OHIO**

*Nick A. Soulas, Jr. Amy L. Hiers*  
Nick A. Soulas, Jr. 0062166 *per authorization*  
First Assistant, Civil Division  
Amy L. Hiers 0065028  
Assistant Prosecuting Attorney  
373 South High Street, 13<sup>th</sup> Floor  
Columbus, Ohio 43215-6318  
(614) 525-3520  
(614) 525-6013 FAX  
nsoulas@franklincountyohio.gov  
ahiers@franklincountyohio.gov  
Counsel for Respondent Franklin County  
Court of Common Pleas

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Answer of Respondent Franklin County Court of Common Pleas was served by First Class U.S. Mail, postage prepaid, to Janice M. Conway, 2005 Dyer Road, Grove City, Ohio, 43123, Relator *pro se*, and Glenn B. Redick, Columbus City Attorney's Office, 77 N. Front St., 4<sup>th</sup> Floor, Columbus, Ohio 43215, counsel for the City of Columbus, Division of Police, Keeper of Records.

*Nick A Soulas by Amy L. Hiers*  
Nick A. Soulas, Jr. 0062166 *per authorization*