

ORIGINAL

IN THE SUPREME COURT OF OHIO

HUNTER T. HILLENMEYER,)	
)	CASE NO. 2014-0235
Appellant,)	
v.)	
)	
CITY OF CLEVELAND BOARD OF)	On Appeal from the Ohio Board of Tax
REVIEW and NASSIM LYNCH,)	Appeals
CLEVELAND TAX ADMINISTRATOR)	
)	
Appellees.)	Board of Tax Appeals Case No. 2009-3688
)	

REQUEST BY APPELLANT HUNTER T. HILLENMEYER
FOR EXTENSION OF TIME TO FILE REPLY BRIEF

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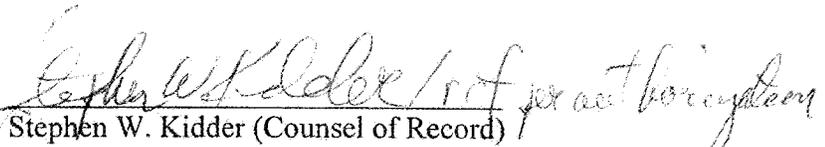
FILED
 JUN 23 2014
 CLERK OF COURT
 SUPREME COURT OF OHIO

**REQUEST FOR EXTENSION OF TIME TO
FILE REPLY BRIEF OF APPELLANT**

This appeal was initially referred to mediation, with all filing deadlines stayed, and returned to the regular docket by Order entered on April 4, 2014, which entry stated that Appellant's brief was due forty days from the date of the entry. Appellant timely filed his merit brief on May 14, 2014. The Appellees filed their merit brief on June 12, 2014. Appellant's reply brief is currently due July 2, 2014. Counsel of record for Appellant has requested counsel of record for Appellees to stipulate to a fifteen-day extension of time, but counsel of record for Appellees stated that she would not agree to an extension of the due date. No reason was given by counsel of record for Appellees for not agreeing to a stipulated extension.

Appellant therefore requests the Court, pursuant to S.Ct. Prac.R. 3.03(B)(2)(b)(i), for an extension of time of ten days, until July 14, 2014, to file his reply brief. The reasons for this request are that this case presents numerous and complex constitutional questions of first impression regarding the validity of municipal regulations and Ohio law, and counsel of record has been extremely busy on other matters, including a parallel appeal before this Court involving related issues in which counsel's merit brief is due to be filed on June 26, 2014. An extension of time will allow counsel to more thoroughly reply to the arguments in Appellees' fifty page brief in this case for the benefit of the Court. No previous extensions have been requested by Appellant in this case.

Respectfully submitted,


Stephen W. Kidder (Counsel of Record)

PHV No. 3032-2014

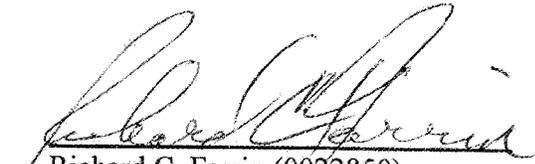
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Request for Extension of Time to File Reply Brief of Appellant was served on Linda L. Bickerstaff, Assistant Director of Law, City of Cleveland Department of Law, 205 West St. Clair Avenue, Cleveland, Ohio 41133, Counsel of Record for Appellees, by email, to lbickerstaff@city.cleveland.oh.us, on this 23rd day of June, 2014.


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