

ORIGINAL

In the  
Supreme Court of Ohio

THE STATE, *ex rel.* ARISTIDES JURADO, *et. al.*, :

Relators, :

v. :

OFFICE OF DISCIPLINARY COUNSEL, *et. al.*, :

And :

FRANKLIN COUNTY COURT OF COMMON  
PLEAS, DOMESTIC RELATIONS DIVISION,  
JUVENILE BRANCH, *et. al.*, :

Respondents :

Case No. **2014-1225**

ORIGINAL ACTION  
IN MANDAMUS AND PROHIBITION

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**MOTION TO STRIKE PORTIONS OF RESPONDENTS' MOTION TO DISMISS AND  
IMPOSE A NEW FILING DEADLINE FOR RELATORS' RESPONSE, OR  
TO STRIKE RESPONDENT'S MOTION TO DISMISS IN THE ALTERNATIVE**

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ARISTIDES JURADO  
3963 Easton Way  
Columbus, OH 43219  
(305) 799-2212  
ari\_jurado@qualineconsulting.com  
For Relators. *Pro Se.*

JEFFERY W. CLARK, Counsel of Record  
Assistant Attorney General  
Constitutional Offices Section  
30 E. Broad Street, 16th Floor  
Columbus, OH 43215  
T. (614) 466-2872; F: (614) 728-7592  
jeffery.clark@ohioattomeygeneral.gov  
Attorney for Respondent  
OFFICE OF DISCIPLINARY COUNSEL, *et. al.*

Ronald J. O'Brien, Counsel of Record  
Franklin County Prosecuting Attorney  
Scott O. Sheets, Assistant Prosecuting Attorney  
373 S. High Street, 13th Floor  
Columbus, OH 43215  
(614) 525.3555  
ssheets@franklincountyohio.gov  
Attorney for Juvenile Court Respondents

FILED  
AUG 25 2014  
CLERK OF COURT  
SUPREME COURT OF OHIO

**MOTION TO STRIKE PORTIONS OF RESPONDENTS' MOTION TO DISMISS**  
**AND IMPOSE A NEW FILING DEADLINE FOR RELATORS' RESPONSE, OR**  
**TO STRIKE RESPONDENT'S MOTION TO DISMISS IN THE ALTERNATIVE PURSUANT TO**  
**S.Ct.Prac.R. 3.11(D) and Civ.R. 12(F)**

Pursuant to Rule 3.11(D), Relator Aristides Jurado ("Relator A.J.") moves this Honorable Court to impose a new deadline for filing a Memorandum in Response to Respondents' Motion to Dismiss, or in the alternative, to strike Respondent's Motion because of **lack of timely service** by Respondents Franklin County Common Pleas Court, Division of Domestic Relations and Juvenile Branch, Judge Terri Jamison and Magistrate Jill Matthews ("Respondents").

Relator A.J. also prays that this Court grants him relief by striking portions of Respondents' Motion to Dismiss containing "insufficient claims or defenses or any redundant, immaterial, impertinent, or scandalous matter." Civ.R. 12(F). As explained in detail in the attached memorandum in support, and demonstrated by the evidence included in the exhibits, Respondents' Motion to Dismiss includes inaccurate statements that render some of their claims insufficient, and also includes information that is defamatory in content.

In regards to untimely service, half of the filed document was served on the date of filing and the second half was served three days later<sup>1</sup> by Respondents as demonstrated by the United States Postal Service-Stamped mailing envelopes and cover letters included in the Exhibits. Pursuant to S.Ct.Prac.R. 3.11(D), this Court may strike any document when its improper or untimely service has an adverse effect on a party.

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<sup>1</sup> See Exhibit V containing USPS-Stamped mailing envelopes and cover letter from Respondents' Counsel

Because each day subtracted from the limited 10-day period prescribed by the rules for filing of a response adversely affects Relator and becomes a significant disadvantage, Relator asks this court in the interest of justice to impose a new filing deadline to give him at minimum, the same number of days lost due to the untimely or deficient service, while noting that the Response is already completed and ready to file since August 19, 2014.

All elements establishing the claims in this motion are set forth in the attached Memorandum in Support, including facts, propositions of law, arguments and conclusion.

Respectfully submitted,

**Relator-Father Pro Se**

By: 

ARISTIDES JURADO  
3963 Easton Way  
Columbus, OH 43219  
(305) 799-2212  
ari\_jurado@qualineconsulting.com

For Relators. Pro Se.

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## MEMORANDUM IN SUPPORT OF MOTION

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### I. FACTS relevant to claims under S.Ct.Prac.R. 3.11(D)

Pursuant to S.Ct.Prac.R. 12.02(A)(2), Respondents were served by the Clerk's Office with the Summons and a copy of Relator's complaint on 7/21/2014 (see case docket). Respondents had 21 days, or until 8/11/2014, to respond or to file a motion to dismiss as prescribed by S.Ct.Prac.R. 12.02(A)(2).

Respondents The Juvenile Court filed their motion to dismiss on 8/8/2014, a few days before their deadline. Their motion to dismiss was filed with Exhibit 'A'—containing a Court Entry issued by Respondent and that became part of the Custody case record—all as one document that included a single Certificate of Service<sup>2</sup>.

Respondent effected service of part of the document on 8/8/2014 by depositing a copy with the United States Postal Service<sup>3</sup>. Subsequently, Relator received the partial document the next day. On the later part of Sunday 8/10/14 as he was reviewing the case docket on this court's website, Relator A.J. learned that Exhibit 'A' had been attached and filed with the Motion to Dismiss, but was missing from the copy that was served upon him. Subsequently, he prepared a Motion to Seal the confidential document, and filed with this court on Monday 8/11.

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<sup>2</sup> See 2014-1255 Case docket.

<sup>3</sup> See Exhibit V containing 2 USPS-Stamped mailing envelopes and 2 cover letters from Respondents' Counsel

On Monday 8/11/2014, Respondents the Juvenile Court effected service of the second part of the document by depositing a copy of Exhibit A and a cover letter with the United States Postal Service<sup>4</sup>.

As Relator's Response was being completed on August 18 and again after it was ready to be filed on August 19, Relator was informed by the Clerk's office that the deadlines are strictly enforced by their office and they would not accept the response on 8/19/2014 because the deadline was 8/18/2014.

## II. FACTS relevant to claims under Civ.R. 12(F)

On Monday August 4, 2014, the Juvenile Court held a full evidentiary hearing on Relator A.J.'s Motion for Modification of Child Support. The Court had given instructions to Relator A.J. the Friday before during the hearing to remove the GAL, when Judge Terri Jamison learned that Relator A.J. had been self-employed for the past several years and had his own company: "bring all supporting documentation for income, including bank statements, receipts, 1099, contracts"<sup>5</sup> etc.

During the start of the 8/4 hearing, while off the record, the court asked Relator A.J. if he had brought with him documentation for the hearing and for addressing the other party's request for production of documents. As part of his affirmative answer, Relator A.J. explained that he had brought documentation even though he had to file an extension for his tax return given his circumstances and that he had brought a letter from his accountant to be introduced

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<sup>4</sup> See Exhibit V containing 2 USPS-Stamped mailing envelopes and 2 cover letters from Respondents' Counsel

<sup>5</sup> 8/1/2014 Court Hearing transcript not yet available for review.

which explained that 1099s are not issued to corporations<sup>6</sup>. But most importantly, he shared that his accountant had estimated that his tax filing would be completed in one more week. Subsequently, Judge Jamison asked her bailiff, Joseph Saffold, to make copies of the documents Relator A.J. had brought with him. At that point, the court took a recess of at least 15 minutes and Mr. Saffold left to use the copier machine in the back offices because the one copier machine that was inside the courtroom only handles light jobs. **The documents to be introduced as exhibits Mr. Saffold copied were at least 37 sheets double-sided or 70+ pages of exhibits<sup>7</sup>.** Mr. Saffold gave the first set to the opposing party. When Relator A.J. asked if he had made a second set for the court, he took the set of documents again to the back offices to make a second set. Upon his return, he left the 2<sup>nd</sup> set of copies on the bench for the Judge<sup>8</sup>.

Later in the 8/4 hearing as Relator A.J. was questioned by the Court, he explained (again) that because he has had an S corporation for the most part of the past 3 years, W2s and 1099s are not generally issued to him by his clients<sup>9</sup>, but he had brought other types of supporting documentation, including credit card and bank statements<sup>10</sup>.

Because the documents came back out of order after being copied, Relator A.J. was slow in locating the Credit card statements upon the request of the court. When he realized that he did have them but were not included in the first set of documents that were copied<sup>11</sup>, the Court

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<sup>6</sup> Refer to Exhibit R, pages R.065 and R.066

<sup>7</sup> Refer to Exhibit R, pages R.003–R.076

<sup>8</sup> Refer to Exhibit Q, page Q.030 (page 28 of transcript, lines 21-24), making references to “in the copies that you were given”.

<sup>9</sup> Refer to Exhibit Q, page Q.012 (page 10 of hearing transcript).

<sup>10</sup> Refer to Exhibit Q, page Q.029 (page 27 of hearing transcript).

<sup>11</sup> Refer to Exhibit Q, page Q.030 (page 28 of transcript,)

took a second short recess of 5 minutes or less, and the bailiff made a few additional copies for opposing counsel and for the Court using the copier machine that was inside the courtroom.

Upon her return and while still off the record<sup>12</sup>, Judge Jamison asked Relator A.J. for a second time “Mr. Jurado, do you now have all your exhibits marked and ready?” When Relator A.J. answered “I don’t know exactly what you mean with ‘marked’, but we just added a few more pages to the set of documents you were given before”. With an immediate reaction, Judge Jamison made her decision to grant opposing counsel’s oral motion to dismiss Relator A.J.’s Motion to Modify Child Support<sup>13</sup>. Relator also asked for a continuance, knowing that in a week, he would be able to produce 100% of all documents being requested and that he was expecting to have legal representation<sup>14</sup> by then. Unfortunately, the court denied his request<sup>15</sup>.

On August 6, 2014, a Court Entry was issued by Respondent Honorable Terri Jamison and became part of the record in the custody case. As soon as Relator A.J. became aware of the content of the Court Entry, he contacted the Manager of the Juvenile Division of the Clerk’s Office, the Supervisor of the Stenographers Office and Judge Jamison’s Bailiff, in an attempt to locate the Exhibits/documentation produced during this most recent hearing<sup>16</sup>. The Stenographer that was present in the courtroom as well as the Bailiff did recall the documents that were copied and given to opposing counsel and the set of copies that were made for the court, but until today those documents remain misplaced or lost. Not even the spreadsheet that Judge Jamison made reference to in the Court Entry can be found in the record of the case.

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<sup>12</sup> See OFF RECORD entry in Exhibit Q, page Q.031 (page 29 of hearing transcript)

<sup>13</sup> Refer to Exhibit Q, pages Q.032–Q.033 (pages 30-31 of the hearing transcript)

<sup>14</sup> Refer to Exhibit Q, page Q.008 (page 6 of the hearing transcript)

<sup>15</sup> Refer to Exhibit Q, page Q.031 (page 29 of the hearing transcript)

<sup>16</sup> Refer to Exhibit S, containing follow up e-mail communications.

### III. LAW AND ARGUMENT

#### Failure to Provide Service

Given that Respondents' Motion to Dismiss was closely related to Exhibit "A" due to its content and references made to the Exhibit, and the fact that both the Motion to Dismiss and Exhibit 'A' were filed with a single cover page and a single Certificate of Service, they are considered one document for the purpose of service. "Each document filed in the Supreme Court shall contain a cover page \* \* \*." S.Ct.Prac.R. 3.07(A). The rules also provide that "all documents presented for filing with the Clerk shall contain a certificate of service". S.Ct.Prac.R. 3.11(C)(1).

When a single document filed with the Clerk's Office is served in different parts at different times, it is considered untimely and improper. As proscribed by the Supreme Court Rules of Practice,

When a party or amicus curiae fails to serve a party or parties to the case in accordance with S.Ct.Prac.R. 3.11(A), any party adversely affected may file a motion to strike the document that was not served. Within ten days after a motion to strike is filed, the party or amicus curiae against whom the motion is filed may file a memorandum in response

Supreme Court Rules of Practice, .Rule 3.11(D)(1).

For the issue at hand, Respondents did not carry out proper and timely service on the filing of their Motion to Dismiss by mailing the second part of their filing several days later<sup>17</sup> adversely affecting Relator A.J. This rule also provides that,

If the Supreme Court determines that service was not made as required by this rule, it may strike the document or, if the interests of justice warrant, order that the document be served and impose a new deadline for filing any responsive document. If the Supreme Court determines that service was made as required by this rule or that service was not made but the movant was not adversely affected, it may deny the motion to strike.

Supreme Court Rules of Practice, .Rule 3.11(D)(2).

As Respondents failed to serve their complete Motion to Dismiss and Exhibit "A" document in a timely fashion, it created a significant disadvantage to Relator, in addition to the existing challenges he is already dealing with in litigating this case and the underlying case. As such, Relator A.J. asks that Respondents' Motion to Dismiss be stricken from the record, or a new deadline be set for Relator A.J. to file its response to the Motion to Dismiss.

Insufficient Claim or Defense,

Immaterial, Impertinent or Scandalous Matter

Respondents' Motion to Dismiss contains a claim or defense based on Mootness, indicating that "the July 22, 2014 hearing which he sought to prevent was *vacated*."<sup>18</sup> (Emphasis Added.) Given that "Vacate" is defined as a legal term "To annul; to cancel or

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<sup>17</sup> See Exhibit V containing 2 USPS-Stamped mailing envelopes and 2 cover letters from Respondents' Counsel

<sup>18</sup> Refer to Respondents the Juvenile Court's Motion to Dismiss filed on 8/8/2014, page 4.

rescind; to render an act void; as, to vacate an entry of record, or judgment”<sup>19</sup>, and considering that Judge Jamison has stated at different times—as recent as the last hearing on the Motion to Modify Child support on 8/4/2014—that she still intends to hear all pending/remaining motions, including the Motions for Contempt<sup>20</sup> that is referenced in their Motion to Dismiss as “the July 22, 2014 hearing”, **this claim or defense meets the criteria of Civ.R. 12(F) that qualifies it for a Motion to Strike.** “The court may order stricken from any pleading any insufficient claim or defense or any redundant, immaterial, impertinent, or scandalous matter.” And as such, Relator A.J. requests that **this portion of their Motion to Dismiss be stricken**, because the hearing on July 22, 2014 was not annulled or cancelled. Instead, it was simply continued to a date yet to be determined.

Furthermore, Respondents’ Motion to Dismiss includes another claim or defense under Mootness, based on the decision issued by Judge Jamison regarding Relator A.J.’s Motion to Modify Child Support while making reference to the Juvenile Court Entry “attached hereto as Exhibit “A”<sup>21</sup>. Yet, Relator A.J. asserts that **such claim and the content of Exhibit “A” also meets the criteria of Civ.R. 12(F)**, for the following reasons:

1) The Juvenile Court entry states that “he produced only a spreadsheet, that he had prepared, as evidence of his income”, when in reality Relator A.J. produced in excess of 70 pages of evidence<sup>22</sup> of his income, including but not limited to (a) Bank Account Statements for the entire 2013 calendar year, (b) Credit Card Statements/Year-End Summary listing business-related expenses by category, (c) Recent Paystub issue by his

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<sup>19</sup> Black’s Law Dictionary Free Online legal Dictionary, 2<sup>nd</sup> Ed.

<sup>20</sup> Refer to Exhibit Q, page Q.009 (page 6 of the court hearing transcript, lines 1-2, 4-5)

<sup>21</sup> Refer to Respondents the Juvenile Court’s Motion to Dismiss filed on 8/8/2014, page 4

<sup>22</sup> Refer to Exhibit R, pages R.003–R.076

current employer, list of checks issued since his hire date and an employer-provided printout of his year-to-date balances for 2014, (d) A tally of business expenses for 2013, (e) Tally of business gross revenue summarizing the information in the bank account statements that were also provided, (f) Business contracts with clients for 2012 and 2013, (g) Letter from Certified Public Accountant explaining that 1099 are only issued for non-corporate payee or non-corporate provider of professional services<sup>23</sup>.

Two court employees have confirmed remembering the documents produced by Relator A.J.: The bailiff for Judge Jamison, who made two set of copies, one for opposing counsel and one for the court; and the stenographer that was present during the hearing. Although the stenographer did remember the bailiff making copies of the documents, she did not receive any of the copies or took possession of any exhibits as the normal process dictates for exhibits introduced during a hearing. Apparently, the documents were left on the bench for the Judge to use during the hearing. Every one of those documents given to the court remains lost<sup>24</sup>, including the spreadsheet mentioned in the Court Entry by Judge Jamison. Most importantly, the statement in the Court Entry reading “he produced only a spreadsheet that he had prepared, as evidence of his income. He testified to business expenses but did not produce any receipts of other verifiable documentation” is inaccurate and can be construed as a defamatory allegation. It causes significant prejudice as it creates the perception of carelessness and disregard for the process, when in fact it is not the case.

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<sup>23</sup> Refer to Exhibit R, pages R.003–R.076

<sup>24</sup> Refer to Exhibit S

2) It is unreasonable to expect a part to bring all receipts to a hearing to support \$60,000.00 of business expenses<sup>25</sup>, especially when only having 3 day notice. Bringing Credit card statements is a reasonable alternative, which is what Relator A.J. did.

3) The statement “He did not have any W2s or 1099 forms” by itself is misleading as it gives the perception that Relator A.J. could have produce them but he did not. Even when the statement is true, leaving key information out, such as the relevancy of those documents when dealing with an ‘S’ Corporation<sup>26</sup>.

4) The Court Entry also contains information about claims from opposing counsel regarding discovery. In contrast, the transcript of the hearing shows that the Judge responded to those claims from opposing counsel as follows “You got a Motion for Contempt pending on that” and “I am gonna (sic)\_do the Motions for Contempt separately”<sup>27</sup>. That was certainly the appropriate response, because the hearing at hand was about establishing income for the two parties for the re-calculation of child support, a proceeding that uses the “best interest of the child” standard. As such, Relator A.J. was only prepared to demonstrate and establish his income, and not deal with allegations around past discovery, which is to be addressed by the Contempt motion. Without any evidence to support opposing counsel’s allegations<sup>28</sup>, the court simply put more weight on her testimony than Relator’s testimony when included opposing counsel’s allegation as a finding of fact in the Court Entry.

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<sup>25</sup> See Exhibit R, pages R.003 and R.073–R.076

<sup>26</sup> See Exhibit Q, pages Q.012 (Court hearing transcript page10)

<sup>27</sup> Refer to Exhibit Q, page Q.009 (page 6 of the court hearing transcript, lines 1-2, 4-5)

<sup>28</sup> See Exhibit Q, page Q.006

5) Opposing Counsel's testimony in the most recent hearing for the Modification of Child Support included misrepresentations as demonstrated by written correspondence, including a certificate of service, between Relator's-then counsel and the attorney for the child's mother. The correspondence is a formal response to production of documents that included a W2, Payment information issue by Relator's client (OmniPoint U.S., LLC.), 2012 tax documents, 2013 paystub breakdown of S-Corporation, Health Insurance Benefit coverage documents, checks for payments made to daycare center among others<sup>29</sup>.

6) Although this Motion's intention is not to address claims of abuse of discretion, Relator A.J. must point out that Respondents continue to fail to protect the best interest of the child, as seen in the outcome of the hearing regarding the Motion to Modify Child Support. For example, the child's mother testified during that hearing that her base salary is \$125,000.00, not including benefits and perks, such as imputed income and employer-match deferred compensation<sup>30</sup>. "[W]hen the combined gross income of the parents exceeds \$150,000, however, child support is determined under R.C. 3119.04(B)," stating:

If the combined gross income of both parents is greater than one hundred fifty thousand dollars per year, the court \* \* \* shall determine the amount of the obligor's child support obligation on a case-by-case basis and shall consider the needs and the standard of living of the children who are the subject of the child support order and of the parents. The court \* \* \* shall compute a basic

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<sup>29</sup> Refer to Exhibit T

<sup>30</sup> See Exhibit Q, page Q.023 (Court hearing transcript page 21)

combined child support obligation that is no less than the obligation that would have been computed under the basic child support schedule and applicable worksheet for a combined gross income of one hundred fifty thousand dollars, unless the court \* \* \* ***determines that it would be unjust or inappropriate and would not be in the best interest of the child***, obligor, or obligee to order that amount.

(emphasis added.) *Bajzer v. Bajzer*, 9th Dist. Summit No. 25635, 2012-Ohio-252, ¶ 5, citing R.C. 3119.04(B).

Even assuming, arguendo, that Relator's income would be higher than the child's mother, or in this case, that the Court found itself unable to determine this information, the starting point would have yielded \$0 for child support payments using the cap of \$150,000.00 and considering the 50/50 parenting schedule and shared custody. Yet, the Court dismissed the action without first making an attempt to find out if the current Child Support amount was in the best interest of the child. Granting Relator's AJ request for a continuance would not have prejudiced the adverse party, and would have allowed him to get the assistance of counsel and his financial documentation in order. In the current situation, the unreasonable and excessive Child Support obligation amount imposed to Relator A.J. is not only affecting him, but is also detrimental to the best interests of the child<sup>31</sup>.

#### IV. CONCLUSION

For reasons that are unknown to Relator A.J., Respondents **did not** (1) carry out proper and timely service on the filing of their Motion to Dismiss, resulting in Relator A.J.'s delay in

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<sup>31</sup> Refer to Exhibit U

being cognizant of the exact content of Exhibit "A" (2) safeguard the confidentiality of the Court Entry in the Juvenile Court case by failing to file Exhibit 'A' under seal, (3) convey accurate or complete information in the Court Entry, resulting in significant prejudice for Relator-Father A.J.

Relator A.J. does not subscribe to the idea of making this action a case about judicial impropriety, but he is compelled to bring to the attention of this court these significant issues while maintaining the decorum and respect of the judiciary.

Relator A.J. also asserts that this Motion is not a response to Respondents' Motion to Dismiss. All the facts and arguments presented herein are for the mere purpose of supporting Relators' Motion to Strike or to impose a new filing deadline for Relators' Response.

Accordingly, Relators respectfully pray this Court to impose a new filing deadline for Relators' response to Respondents' Motion to Dismiss pursuant to S.Ct.Prac.R. 3.11(D), and strike portions of Respondents Motion to Dismiss/Exhibit 'A' that meet the criteria under Civ.R. 12(F). In the alternative, if this Court finds that these claims have sufficient merit, this Court should strike Respondents Motion to Dismiss in its entirety pursuant to S.Ct.Prac.R. 3.11(D).

Ideally, this Motion would be rendered moot after this Court finds Respondents Motion to Dismiss meritless and denies it. Even then, a denied motion may have prejudicial content that would require review under Civ.R. 12(F), upon Relators' request set forth herein.

Respectfully submitted,

**Relator-Father Pro Se**

By:



ARISTIDES JURADO  
3963 Easton Way  
Columbus, OH 43219

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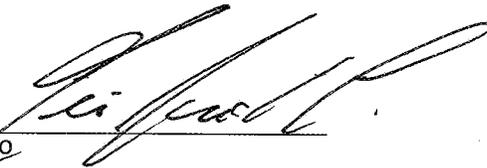
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FOR VERIFICATION OF MOTION TO IMPOSE A NEW FILING DEADLINE  
OR TO STRIKE RESPONDENT'S MOTION TO DISMISS**

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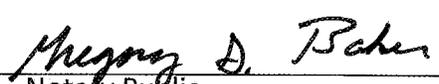
**STATE OF OHIO  
COUNTY OF FRANKLIN, SS.**

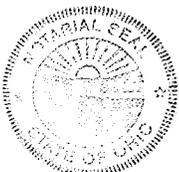
Now comes Aristides Jurado as the Affiant herein and having been duly sworn and cautioned deposes and states that he is the Relator in the foregoing action, that he has reviewed the foregoing motion, and that the facts and allegations stated therein are true to the best of his knowledge and belief.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
Aristides Jurado

SWORN to before me and subscribed in my presence this 19th day of August, 2014.

  
Notary Public



Gregory S. Baker  
Attorney at Law  
Notary Public, State of Ohio  
My Commission Has No Expiration  
Section 147.03 R.C.

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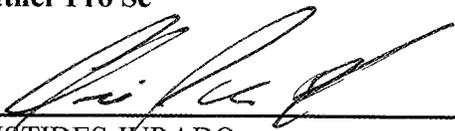
**MOTION TO SEAL**

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Now comes Relator-Father Aristides Jurado, acting Pro Se, and Relator-Minor Child N.G., through his father Relator Aristides Jurado, and hereby moves this honorable to file under seal Exhibits P, Q, R, S, T and U being filed as a single document with the Clerk's Office. The exhibits contain documents, records and information related to custody case pending in Franklin County Commons Pleas Court, Juvenile Branch, which are confidential pursuant to Juv.R. 32(C) and Juv.R. 37(B). Relators do not seek to seal this motion.

Respectfully submitted,

**Relator-Father Pro Se**

By: 

ARISTIDES JURADO

3963 Easton Way

Columbus, OH 43219

(305) 799-2212

ari\_jurado@qualineconsulting.com

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FOR VERIFICATION OF MOTION TO SEAL**

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**STATE OF OHIO  
COUNTY OF FRANKLIN, SS.**

Now comes Aristides Jurado as the Affiant herein and having been duly sworn and cautioned deposes and states that he is the <sup>Relator</sup> ~~Respondent~~ <sup>ASC</sup> in the foregoing action, that he has reviewed the foregoing motion, and that the facts and allegations stated therein are true to the best of his knowledge and belief.

**FURTHER AFFIANT SAYETH NAUGHT.**

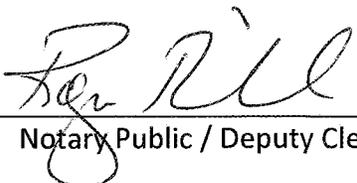
STATE OF OHIO  
COUNTY OF FRANKLIN

SWORN to before me and subscribed in my presence this 17th day of August, 2014.

  
Aristides Jurado

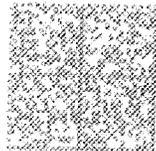


ROGER RILL  
Notary Public, State of Ohio  
My Commission Expires 03-14-18

  
Notary Public / Deputy Clerk



**RON O'BRIEN**  
PROSECUTING ATTORNEY  
FRANKLIN COUNTY, OHIO  
373 South High Street • Columbus, Ohio 43215



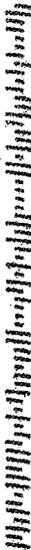
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Aristides Jurado  
3963 Easton Way  
Columbus, Ohio 43219

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The STATE ex rel., JURADO v. ODC, FCCPCJB  
Exhibit V



**RON O'BRIEN**

**FRANKLIN COUNTY PROSECUTING ATTORNEY**

August 8, 2014

The STATE ex rel., JURADO v. ODC, FCCPCJB  
Exhibit V

Aristides Jurado  
3963 Easton Way  
Columbus, Ohio 43219

Re: *State ex rel. Aristides Jurado v. Office of Disciplinary Counsel, et al.*  
Case No. 2014-1225

Dear Mr. Jurado,

Please find enclosed Respondents Franklin County Court of Common Pleas, Domestic Relations and Juvenile Branch, Judge Terri Jamison, and Magistrate Matthews' Motion to Dismiss in the above-captioned case.

Sincerely,

SOS/alm

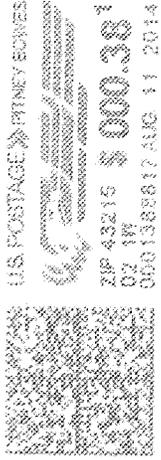
Scott O. Sheets  
Assistant Prosecuting Attorney

Enclosure  
SOS/alm



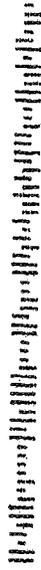
**RON O'BRIEN**  
 PROSECUTING ATTORNEY  
 FRANKLIN COUNTY, OHIO  
 573 South High Street • Columbus, Ohio 43215

Aristides Jurado  
 3963 Easton Way  
 Columbus, Ohio 43219



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The STATE ex rel., JURADO v. ODC, FCCPCJB  
 Exhibit V

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**RON O'BRIEN**

**FRANKLIN COUNTY PROSECUTING ATTORNEY**

August 8, 2014

Aristides Jurado  
3963 Easton Way  
Columbus, Ohio 43219

The STATE ex rel., JURADO v. ODC, FCCPCJB  
Exhibit V

Re: *State ex rel. Aristides Jurado v. Office of Disciplinary Counsel, et al.*  
Case No. 2014-1225

Dear Mr. Jurado,

Please find enclosed Exhibit A to the Defendants' Motion to Dismiss filed in the above-captioned case on August 8, 2014.

Sincerely,

Scott O. Sheets  
Assistant Prosecuting Attorney

Enclosure  
SOS/alm

**CERTIFICATE OF SERVICE**

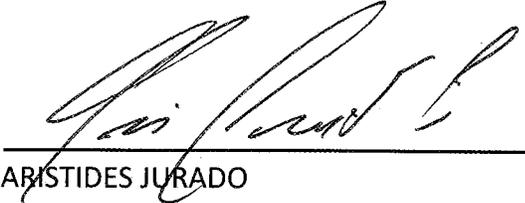
I hereby certify that a true and accurate copy of the foregoing was served via personal service on this 22<sup>nd</sup> day of August, 2014, upon the following:

JEFFERY W. CLARK, Counsel of Record  
Assistant Attorney General  
Constitutional Offices Section  
30 E. Broad Street, 16th Floor  
Columbus, OH 43215  
T. (614) 466-2872; F: (614) 728-7592  
jeffery.clark@ohioattomeygeneral.gov  
Attorney for Respondent  
OFFICE OF DISCIPLINARY COUNSEL, *et. al.*

Ronald J. O'Brien, Counsel of Record  
Franklin County Prosecuting Attorney  
Scott O. Sheets, Assistant Prosecuting Attorney  
373 S. High Street, 13th Floor  
Columbus, OH 43215  
(614) 525.3555  
ssheets@franklincountyohio.gov  
Attorney for Juvenile Court Respondents

**Relator-Father Pro Se**

By:

  
ARISTIDES JURADO  
3963 Easton Way  
Columbus, OH 43219  
(305) 799-2212  
ari\_jurado@qualineconsulting.com