

ORIGINAL

Case No. 14-1478

**Supreme Court
of the State of Ohio**

**STATE OF OHIO *ex rel.* COMMITTEE FOR CHARTER AMENDMENT
PETITION TO LIMIT THE USE OF PHOTO-MONITORING DEVICES
IN THE CITY OF MAPLE HEIGHTS, OHIO, *et al.*,**

Relators,

v.

CITY OF MAPLE HEIGHTS, OHIO, *et al.*,

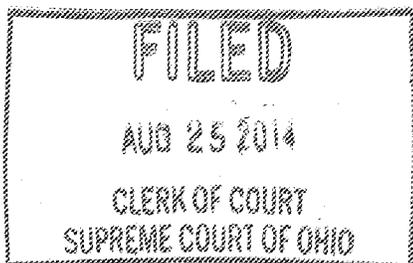
Respondents.

Original Action in Mandamus / Expedited Election Matter

RELATORS' MOTION TO ESTABLISH SECURITY FOR COSTS

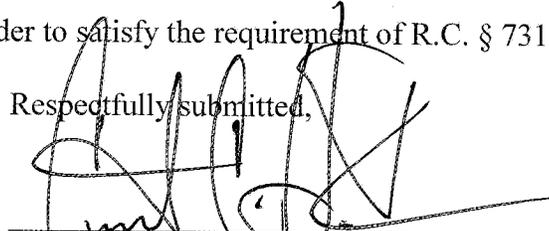
Curt C. Hartman (0064242)
Lead Counsel
The Law Firm of Curt C. Hartman
7394 Ridgepoint Drive, Suite 8
Cincinnati, OH 45230
(513) 752-2878
hartmanlawfirm@fuse.net

Christopher P. Finney (0038998)
FINNEY LAW FIRM LLC
4270 Ivy Pointe Blvd., Suite, 225
Cincinnati, OH 45245
(513) 943-6655
chris@finneylawfirm.com
Counsel for Relators



(1998), this Court expressly concluded “Relators...gave security for costs, as required by R.C. 733.59,” *id.* at 595, and a review of the docket in that case (Case No. 98-519) confirms that the relator therein only posted the required \$100 security for additional costs as required by the predecessor to S. Ct. Prac R. 3.05; and in *Morris v. Macedonia City Council*, 71 Ohio St.3d 52, 641 N.E.2d 1075 (1994), this Court similarly concluded the relator “has provided security for costs, as required by R.C. 733.59,” *id.* at 58, and the docket in that case (Case No. 1994-1996) also indicated only the posting of the \$100 security as required by the predecessor to S. Ct. Prac R. 3.05. Thus, the precedent of this Court confirms the posting of the additional security required by S. Ct. Prac R. 3.05 satisfies the requirement of R.C. § 731.59. But out of an abundance of caution, Relators seek confirmation of this precedent or the establishment of whether additional security is required in order to satisfy the requirement of R.C. § 731.59.

Respectfully submitted,



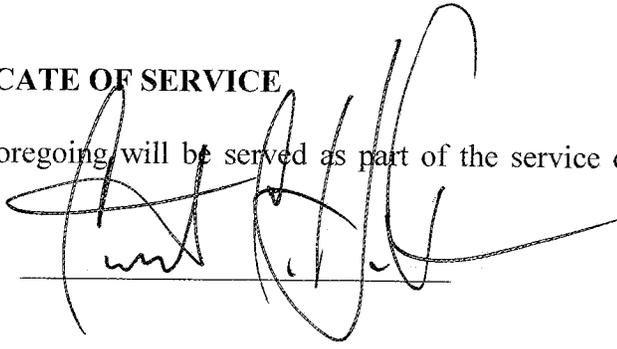
Curt C. Hartman (0064242)
The Law Firm of Curt C. Hartman
3749 Fox Point Court
Amelia, Ohio 45102
(513) 752-2878
hartmanlawfirm@fuse.net

Christopher P. Finney (0038998)
FINNEY, STAGNARO,
SABA & PATTERSON CO.,L.P.A.
2623 Erie Avenue
Cincinnati, Ohio 45208
(513) 533-2980
chris@finneylawfirm.com

Attorneys for Relators

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing will be served as part of the service of the Complaint herein.



A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a horizontal line.