

Case No. 2014-1141

**Supreme Court
of the State of Ohio**

STATE OF OHIO *ex rel.*
OHIO REPUBLICAN PARTY,

Relator,

v.

EDWARD FITZGERALD, County Executive, County of Cuyahoga,

and

COUNTY OF CUYAHOGA and KOULA CELEBREZZE,

Respondents.

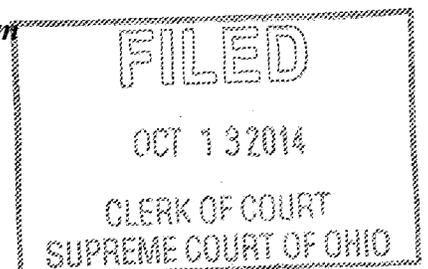
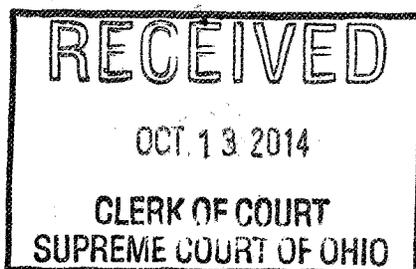
**RELATOR'S MOTION TO EXTEND OR RESET
DEADLINES FOR SUBMISSION OF EVIDENCE AND BRIEFS**

Counsel for Relator

Curt C. Hartman (0064242)
THE LAW FIRM OF CURT C. HARTMAN
7394 Ridgpoint Drive, Suite 8
Cincinnati, OH 45230
(513) 752-2878
hartmanlawfirm@fuse.net

Daniel P. Carter (0074848)
LAW FIRM OF DANIEL P. CARTER
1400 West Sixth St. Suite 300
Cleveland, OH 44113
(216) 392-4509
dpc@dpcarterlaw.com

Chrisophter P. Finney (0038998)
FINNEY LAW FIRM LLC
4270 Ivy Pointe Blvd., Suite 225
Cincinnati, Ohio 45245
(513) 943-6655
chris@finneylawfirm.com



Supreme Court of the State of Ohio

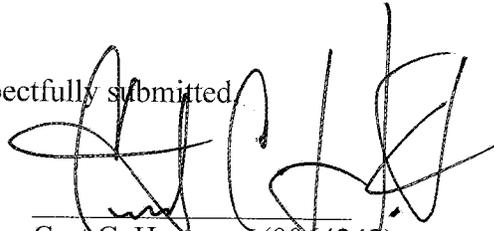
STATE OF OHIO <i>ex rel.</i>	:	Case No. 2014-1141
OHIO REPUBLICAN PARTY,	:	
	:	
Relator,	:	
	:	
v.	:	RELATOR'S MOTION TO EXTEND OR
	:	RESET DEADLINES FOR SUBMISSION
EDWARD FITZGERALD, <i>et al.</i> ,	:	OF EVIDENCE AND BRIEFS
	:	
Respondents.	:	

The State of Ohio, on relation to the Ohio Republican Party (hereinafter, "Relator"), hereby moves for the Court to extend or reset the deadlines for the submission of evidence and briefs.

MEMORANDUM IN SUPPORT

On September 24, 2014, this Court issued an alternative writ and set forth a schedule for the submission of evidence and briefing. *09/24/2014 Case Announcements*, 2014-Ohio-4160. Immediately thereafter, Relator undertook efforts to develop a full and complete evidentiary record so as to refute any defense Respondents may assert to justify their non-compliance with their legal duties under the Public Records Act. In response, though, Respondents have belatedly sought to refer this matter to mediation and also have sought a protective order against such discovery efforts. Needless to say, such actions by the Respondents have necessitated the present motion seeking an extension or resetting of the deadlines for the submission of evidence and briefing.

Respectfully submitted,



Curt C. Hartman (0064247)
THE LAW FIRM OF CURT C. HARTMAN
7394 Ridgepoint Drive, Suite 8
Cincinnati, OH 45230
(513) 752-2878
hartmanlawfirm@fuse.net

Daniel P. Carter (0074848)
LAW FIRM OF DANIEL P. CARTER
1400 West Sixth Street, Suite 300
Cleveland, OH 44113
(216) 392-4509
dpc@dpcarterlaw.com

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

Attorneys for Relator

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing will be served upon the following via regular mail on the 10th day of October 2014:

Majeed G. Makhlouf
Robin M. Wilson
Cuyahoga County Department of Law
Cuyahoga County Administrative Headquarters
2079 East Ninth Street, 7th Floor
Cleveland, Ohio 44115

