

THE SUPREME COURT OF OHIO

LORAIN COUNTY BAR ASSOC.)	CASE NO. 2014-1516
)	
Relator,)	<u>RELATOR'S MOTION TO</u>
)	<u>REMAND TO BOARD FOR</u>
v.)	<u>DEFAULT PROCEEDINGS</u>
)	(GOV. BAR R. V(6a)(D))
RAMI MAJED AWADALLAH)	
)	
Respondent.)	

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Now comes Relator, Lorain County Bar Association, by and through the undersigned Bar Counsel, and respectfully moves this Honorable Court, pursuant to Gov. Bar R. V(6a)(D), to issue an Order remanding the instant matter to the Board of Commissioners on Grievances and Discipline for the purpose of seeking Permanent Disbarment of Respondent.

For cause, Relator hereby submits that this Court entered an order of Interim Default Suspension against Respondent, pursuant to Gov. Bar R. V (6a)(B)(1), on October 9, 2014 for his failure to file an answer to Relator's formal complaint pending before the Board.

Gov. Bar R. V (6a)(D) permits Relator to seek the initiation of Permanent Disbarment proceedings within one hundred eighty (180) days of the suspension.

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OCT 21 2014

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Respondent harmed multiple governmental agencies by processing numerous tax complaints and/or appeals that were never prosecuted, by scheduling untold hearings that did not go forward, and by managing cases that were frivolous and/or often filed without the informed consent of his "clients." Relator states that it will provide sworn and/or certified documentary prima facie evidence in its motion to establish clear and convincing proof of Respondent's misconduct.

As such, it is Relator's position that Disbarment is appropriate.

Further, Relator hereby represents to the Court that after the appropriate due-diligence, and pursuant to Gov. Bar R. V(6a)(B)(2), there is no known Restitution currently owed to any victim/grievant.

Relator's motion is timely filed within the one hundred eighty (180) time period prescribed by Rule. Accordingly, Relator seeks to remand the within matter to the Board in order to initiate default proceedings pursuant to Gov. Bar R. V(6a)(F.)

WHEREFORE, for the forgoing reasons, Relator respectfully requests this Honorable Court issue an order, pursuant to Gov. Bar. R. V(6a)(D), remanding the matter herein to the Board for default proceedings as soon as is appropriate in the premises.

Respectfully Submitted,

D. CHRIS COOK, #0061073

The Commons

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PROOF OF SERVICE

This is to certify that a copy of the foregoing Motion was sent to the following by way of Regular U.S. mail this 16th day of October, 2014:

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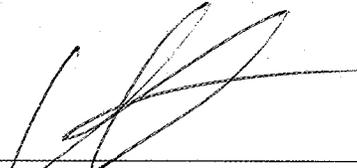
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