



For cause, Relator states that the Ohio Supreme Court through its Rules of Superintendence for the Courts of Ohio has explicitly stated that in Ohio “court records are presumed open to public access.” Sup. R. 45(A).

This Court does, however, allow public access to case documents to be restricted under certain circumstances. Pursuant to Sup. R. 45(E)(1), a party may request that the court restrict public access to information contained in a case document or, if necessary, the entire document.

Pursuant to Sup. R. 45(E)(2), a court shall restrict public access to a case document, information contained therein or, if necessary, the entire document, if it finds by clear and convincing evidence that the presumption of allowing public access is outweighed by a higher interest after considering each of the following:

- a) Whether public policy is served by restricting public access;
- b) Whether any state, federal or common law exempts the document or information from public access;
- c) Whether factors that support restriction of public access exist, including risk of injury to persons, individual privacy rights and interests, propriety business information, public safety, and fairness to the adjudicatory process.

Based on the factors enumerated in Sup R. 45(E)(2), Relator submits that public access to Exhibit “3,” with attachments in support, and Exhibit “5” in Relator’s Motion For Emergency *Ex-Parte* Immediate Interim Suspension should be restricted.

First, both public policy and the individual privacy rights of the victims will be served and protected if the Exhibits and supporting attachments are filed under seal.

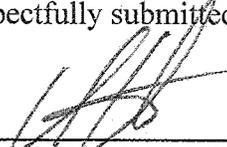
Relator’s Motion seeks relief of a highly sensitive nature and contains personal information which is not appropriate for public consumption.

Second, there are no state, federal, or common law exemptions applicable to this Motion; thus, the Court should use its discretion in this case to prevent the public dissemination of personal, sensitive, and potentially stigmatizing information from entering the public domain.

Finally, the original identity of all parties as well as all documents have been disclosed to Respondent by Relator thus Respondent will suffer no prejudice if the selected exhibits are filed under seal.

**WHEREFORE**, Relator respectfully requests that this Honorable Court file Exhibit "3," with attachments in support, and Exhibit "5," in its Emergency *Ex-Parte* Motion for Immediate Interim Remedial Suspension under seal pursuant to Sup. R. 45(E).

Respectfully submitted,



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**D. CHRIS COOK**, #0061073  
The Commons  
520 Broadway, Third Floor  
Lorain, OH 44052  
PH: (440) 246-2665  
FX: (440) 246-2670  
email: [cooklaw@centurytel.net](mailto:cooklaw@centurytel.net)  
Attorney for Relator & Bar Counsel  
Lorain County Bar Association  
Legal Ethics and Grievance Committee

**PROOF OF SERVICE**

A copy of the foregoing Relator's Motion to File Selected Exhibits to Emergency *Ex-Parte* Motion for Immediate Interim Remedial Suspension under Seal has been sent via Hand-Delivery and/or Regular U. S. Mail this 18<sup>th</sup> day of November, 2014 to the following:

Richard Dove, Esq.  
Board of Commissioners on  
Grievance & Discipline  
Supreme Court of Ohio  
65 South Front Street, 5<sup>th</sup> Floor  
Columbus, OH 43215-3431

Scott Drexel, Esq.  
Office of Disciplinary Counsel  
Supreme Court of Ohio  
250 Civic Center Drive, Ste. 325  
Columbus, OH 43215-7411

Eugene P. Whetzel, Esq.  
Ohio State Bar Association  
Certified Grievance Committee  
1700 Lakeshore Drive  
Columbus, OH 43204

Jeannie Motylewski, Exec. Director  
LCBA  
627 Broad Street  
Elyria, OH 44035

Michael W. Fine, Esq.  
Fine Legal Services, LLC  
5050 Waterford Drive  
Sheffield Village, OH 44035  
RESPONDENT

Robert V. Housel, Esq.  
ROBERT V. HOUSEL CO., L.P.A.  
1660 West 2<sup>nd</sup> Street  
Skylight Office Tower, Suite 950  
Tower City Center  
Cleveland, Ohio 44113  
Attorney for Respondent



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**D. CHRIS COOK**  
Attorney for Relator & Bar Counsel  
Lorain County Bar Association  
Legal Ethics and Grievance Committee

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