

IN THE SUPREME COURT OF OHIO

State *ex rel.*, THE HONORABLE
ANGELA R. STOKES,

Relator,

v.

THE HONORABLE RONALD B. ADRINE, and
THE HONORABLE MABEL M. JASPER,

Respondents.

CASE NO: 14-0467

Original Action in Prohibition

**RELATOR'S MOTION FOR RECONSIDERATION OF NOVEMBER 19, 2014 ORDER
DISMISSING THE ALTERNATIVE WRIT OF PROHIBITION, CONVERTING THE
MOTION FOR CLARIFICATION OF RESPONDENT TO A MOTION FOR
RECONSIDERATION, GRANTING THE SAME, AND DENYING RELATOR'S
MOTION TO SHOW CAUSE WHY RESPONDENT SHOULD NOT BE HELD IN
CONTEMPT FOR FAILING TO COMPLY WITH THIS COURT'S ALTERNATIVE
WRIT**

Richard C. Alkire (#0024816)
Dean Nieding (#0003532)

RICHARD C. ALKIRE CO., L.P.A.
6060 Rockside Woods Blvd., Suite 250
Independence, Ohio 44131-2335
216-674-0550
Fax: 216-674-0104
rick@alkirelawyer.com
dean@alkirelawyer.com

Attorneys for Relator,
The Honorable Angela R. Stokes

Alvin E. Mathews, Jr.
Gerhardt A. Gosnell, II
James E. Arnold & Associates, L.P.A.
115 West Main Street, Suite 400
Columbus, OH 43215
614-460-1600
Fax: 614-469-1134
amathews@arnlaw.com
ggosnell@arnlaw.com

Attorneys for Respondents,
The Honorable Ronald B. Adrine and
The Honorable Mabel M. Jasper

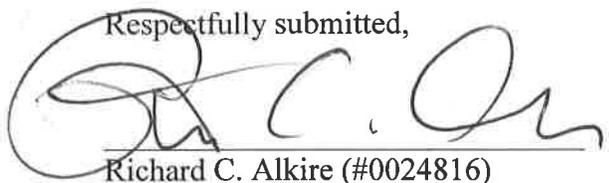
LAW OFFICE OF
Richard C. Alkire Co., L.P.A.
250 Spectrum Office Building • 6060 Rockside Woods Boulevard • Independence, Ohio 44131-2335
(216) 674-0550 • Fax: (216) 674-0104

RELATOR'S MOTION FOR RECONSIDERATION OF NOVEMBER 19, 2014 ORDER DISMISSING THE ALTERNATIVE WRIT OF PROHIBITION, CONVERTING THE MOTION FOR CLARIFICATION OF RESPONDENT TO A MOTION FOR RECONSIDERATION, GRANTING THE SAME, AND DENYING RELATOR'S MOTION TO SHOW CAUSE WHY RESPONDENT SHOULD NOT BE HELD IN CONTEMPT FOR FAILING TO COMPLY WITH THIS COURT'S ALTERNATIVE WRIT

Relator, the Honorable Angela R. Stokes, moves this Honorable Court, pursuant to Sup. Ct. Prac. R. 18.02, to reconsider its Order of November 19, 2014 (Ex. A) because it conflicts with well-established precedent from this same Court which does not require that alternative remedies be undertaken when a Court acts beyond its jurisdiction. As such, the November 19, 2014 Order premised on the failure of Relator "to exhaust available remedies under Sup. R. 4.02" ignores well-established precedent of this Court and therefore it is respectfully submitted such Order, in its entirety, should be reconsidered.

Accordingly, for the foregoing reasons and those more fully set forth in the Memorandum attached hereto and incorporated herein by reference, this Honorable Court is requested to reconsider its November 19, 2014 Order which converted the pending Motion for Clarification of Respondent into a Motion for Reconsideration without giving Relator notice and an opportunity to respond, granting the same, and thereby dismissing the Alternative Writ of Prohibition. The November 19, 2014 Order also denied Relator's Motion to Show Cause Why Respondent Should Not Be Held in Contempt for Failing to Comply with this Court's Alternative Writ.

Respectfully submitted,



Richard C. Alkire (#0024816)
Dean Nieding (#0003532)

RICHARD C. ALKIRE CO., L.P.A.
250 Spectrum Office Building
6060 Rockside Woods Boulevard
Independence, Ohio 44131-2335
(216) 674-0550 / Fax: (216) 674-0104

Attorneys for Relator
The Honorable Angela R. Stokes

MEMORANDUM

I. INTRODUCTION AND STATEMENT OF THE CASE

The instant Original action, a Complaint in *Quo Warranto*, Mandamus and Prohibition with Affidavit of the Honorable Judge Angela R. Stokes, attached, and a Memorandum in Support were filed on March 26, 2014. This Complaint was filed twelve days after Administrative Orders and Inter-Office Correspondence were issued by Respondent, the Honorable Ronald B. Adrine.

In this regard, the Administrative Orders which affected Relator's personal docket included Administrative Order No. 2014-003 (which transferred and reassigned all of Relator's pending criminal misdemeanor, criminal minor misdemeanor, and traffic matters), Administrative Order No. 2014-004 (which transferred status review of all probation matters on the personal docket of Relator and her Session One Assignments), Administrative Order No. 2014-005 (which transferred responsibility for the status review of individuals sentenced to incarceration by Relator), and Administrative Order No. 2014-006 (which increased the civil case assignments to the personal docket of Relator and her Session One Assignments). Administrative Order No. 2014-007 denied the Public Defenders' Motion to Transfer Cases from Relator's docket as moot and Administrative Order No. 2014-008 required the retrieval of all criminal and traffic files from Relator's custody.

In addition to the Administrative Orders, and at the same time that they were issued, Judge Adrine issued Inter-Office Correspondence which restricted Judge Stokes' access to case files for which the Clerk of Courts of the Cleveland Municipal Court is the custodian. Judge Stokes was required to request access to any criminal and traffic files according to a new procedure. This procedure required Judge Stokes to notify Judge Adrine of her request for such

files. As a result, Judge Adrine's required procedures violated the duties reposed in the Clerk of Courts, and also interfered with Judge Stokes' and her counsel's ability to defend her in her discipline case. Not only is Judge Adrine the original grievant in the discipline case, he had also placed himself in a position to monitor Judge Stokes' efforts to prepare herself for the hearing and pre-hearing matters in her discipline case.

The very Administrative Orders issued by Respondent underlying this Original action had as their explicit basis the pending disciplinary Certified Complaint filed against Judge Stokes and alleged written incident reports, none of which had been presented contemporaneously with their receipt or otherwise to Judge Stokes.¹ As the Original action alleged, Judge Adrine's actions in connection with Judge Stokes' criminal docket amounted to a usurpation of the Supreme Court of Ohio's constitutional exclusive authority and jurisdiction to regulate the Judiciary and the bar under Article IV §2(B)(1)(g) of the Ohio Constitution and the usurpation of the roles of Judge Stokes, Respondent in the discipline matter; Disciplinary Counsel, the Relator in the discipline matter; and the Board of Commissioners on Grievances and Discipline of the Ohio Supreme Court (hereinafter "The Board") in connection with the pending disciplinary matter, which was instituted, in part, by Judge Adrine who filed the initial grievance giving rise to the pending Certified Complaint and Amended Complaint.²

¹ It was not until Judge Adrine complied with a public records request on May 20, 2014 that Judge Stokes received through her counsel, for the first time, the alleged incident reports.

² In addition, these various same Administrative Orders ignored the requirements of Sup. R. 36 and Crim. R. 25 which Judge Adrine must follow in connection with his assignment and reassignment of cases to and from Judge Stokes. As such these unlawful Administrative Orders also usurp this Court's constitutional authority and exclusive jurisdiction to promulgate Rules of Practice and Procedure before all the Courts of Ohio pursuant to Article IV §5(B) of the Ohio Constitution.

On September 3, 2014, after this Honorable Court denied Respondents' Motion to Dismiss in connection with the Writ of Prohibition against Judge Adrine sought by Relator, it ordered the parties to present evidence and their Merit Briefs. (Ex. B) This Order dismissed the Writs of *Quo Warranto* and *Mandamus* sought by Relator.

In conformity with this Order, the parties filed evidence by way of Affidavits with this Honorable Court and their Merit Briefs. Relator's Merit Brief was filed on October 2, 2014. Respondent's Merit Brief in connection with the Alternative Writ of Prohibition was filed on October 23, 2014.

In addition, on September 22, 2014, Respondent filed a Motion for Clarification of Respondent's Obligations Pursuant to this Court's Alternative Writ. This motion was filed nineteen days after the Alternative Writ of Prohibition was issued (September 3, 2014) and Relator responded to the same on September 27, 2014 in the Reply of Relator to Motion for Clarification of Respondent's Obligations Pursuant to the Court's Alternative Writ (hereinafter "the Reply") underscoring Respondent's failure to stay the Administrative Orders which had exceeded his jurisdiction and authority. In addition, Relator filed her Motion to Show Cause Why Respondent Should Not Be Held in Contempt for Failing to Comply with This Court's Alternative Writ on October 13, 2014, which was opposed by Respondent on October 23, 2014.

Thereafter, on November 19, 2014, this Honorable Court ruled on all the pending matters by converting Respondent's Motion for Clarification of his obligations in connection with the Alternative Writ into a Motion for Reconsideration of the issuance of the Alternative Writ of Prohibition, and granted the same thereby dismissing the Alternative Writ of Prohibition, all without notice to Relator and an opportunity to respond. This Court explicitly held that "the Petitioner failed to exhaust available remedies under Sup. R. 4.02." (Ex. A) This ruling is

contrary to established precedent of this Honorable Court which has issued a Writ of Prohibition in situations where a Court unambiguously and patently exceeds its jurisdiction in respect to a particular matter, as is more fully set forth below.

In addition, having dismissed the Alternative Writ of Prohibition, this Honorable Court went on to deny Relator's Motion to Show Cause Why Respondent Should Not be Held in Contempt for Failing to Comply with the Court's Alternative Writ.

It is with respect to all of these rulings expressed in the November 19, 2014 Order that Relator seeks reconsideration.

II. LAW AND ARGUMENT

A. A Writ Of Prohibition Lies In Connection With A Court's Exceeding Its Jurisdiction Even If Alternative Remedies Exist.

Without reiterating all of the legal arguments previously raised by Relator in connection with Respondent's argument that Sup. R. 4.02 amounts to an administrative remedy which should have been exhausted in the Writ of Mandamus context, not the Writ of Prohibition context,³ Relator submits there is well established precedent indicating that the availability of alternative remedies is irrelevant when a lower tribunal is without jurisdiction to act.

In this regard, in Department of Administrative Services, Office of Collective Bargaining, v. State Employment Relations Bd., 54 Ohio St. 3d 48, 53, 562 N.E.2d 125, 130 (1990), this Court held that the third prong of the prerequisites for issuing a Writ of Prohibition, was that:

³ See Merit Brief of Relator, pp. 25-27; Relator's Memorandum in Opposition to Respondent's Motion to Dismiss, pp. 4-5. In her Memorandum in Opposition to Respondent's Motion to Dismiss, pp. 10-11, Relator asserted that Judge Adrine had an unambiguous and patent lack of jurisdiction to issue such Administrative Orders when such Orders were addressed in the Writ of Prohibition context.

. . . denying the writ will result in injury for which no other adequate remedy exists in the ordinary course of law. Tellis, supra . . . the third is satisfied because a patent and unambiguous lack of jurisdiction makes availability of either appeal or injunction irrelevant. Gusweiler, supra; State, ex. rel. Coyne, v. Todia (1989), 45 Ohio St. 3d 232, 543 N.E.2d 1271.

In Department of Administrative Services, a Writ of Prohibition was issued because the court of appeals did not have jurisdiction to issue an injunction or even generally have jurisdiction under the facts and circumstances of the particular case which had been filed. Because that lack of jurisdiction was deemed patent and unambiguous, this Court held it was proper to issue the Writ of Prohibition even though Respondents in that case argued that a court of appeals has authority to determine its own jurisdiction. Similarly in the instant matter, Relator submits that Sup. R. 4.02 which allows for a vote of the entire Court to overturn Orders issued by the Administrative Judge (in contrast to the usual rule referred to by Respondents in Department of Administrative Services that a Court possesses authority to determine its own jurisdiction), does not amount to an adequate remedy requiring that the Writ of Prohibition be dismissed.

When a Court patently and unambiguously lacks jurisdiction to consider a matter, a Writ of Prohibition will issue to prevent assumption of jurisdiction regardless of whether the lower court has ruled on the question of its jurisdiction.

* * *

A superior court will afford an inferior court the opportunity to decide its own jurisdiction before granting an extraordinary Writ, but where the Court, in deciding its own jurisdiction, attempts to confer jurisdiction upon itself where in fact no jurisdiction whatsoever exists, such an improper assumption of jurisdiction is a usurpation of judicial power and any Order made by a Court of Common Pleas pursuant to usurpation of judicial power is void and of no force or effect.

Department of Administrative Service, supra, 54 Ohio St. 3d at 52, 562 N.E.2d at 51-52, 562 N.E.2d at 129.

Likewise, this Court allowed a Writ of Prohibition in a matter involving the Bedford Municipal Court exceeding its jurisdiction in respect to a Motion for Damages even though the Respondent Judge argued that the question of jurisdiction had not yet been decided making the Prohibition action premature. This Court recognized that the lower Court had expressed its intent to exercise jurisdiction in the matter by virtue of the Order explicitly entered by the Judge. See State ex rel Safeco Ins. Co. v. Kornowski, 40 Ohio St. 2d 20 (1974) 317 N.E.2d 920. Just as in Kornowski, Judge Adrine expressed in his Administrative Orders that they were based upon the pending disciplinary matter which has not yet been resolved, thereby making it unambiguous and patent that they usurp the exclusive authority of this Honorable Court in respect to the discipline of judges. Cf. State, ex rel Fenwick v. Finkbiner, 72 Ohio St. 3d 457, 650 N.E.2d 896 (1995) (although this Court found that the lower Court had the basic statutory jurisdiction to proceed in the case thereby reversing the Court of Appeals grant of the Writ of Prohibition, the Supreme Court made it clear that “. . . the availability of adequate remedies is irrelevant if the lower tribunal is without jurisdiction whatsoever to act and the lack of jurisdiction is patent and unambiguous.”)

Along these same lines, in State ex rel. Adams v. Gusweiler, 30 Ohio St. 2d 326, 285 N.E.2d 22 (1972) an arbitration agreement provided that a decision by an arbitrator is final and binding. Yet, the Respondent in that case cited the arbitration provisions of the Ohio Revised Code which conferred jurisdiction upon the Court of Common Pleas to review the Arbitration ruling. This Court determined that applying this Ohio Revised Code Section to that matter was inappropriate, and a Writ of Prohibition was available to preclude such attempt by a lower tribunal to exercise jurisdiction based on such statute. In construing the situation before the Court, this Honorable Court held:

If an inferior Court is without jurisdiction whatsoever to act, the availability or adequacy of a remedy of appeal to prevent the resulting injustice is immaterial to the exercise of supervisory jurisdiction by a superior Court to prevent usurpation of jurisdiction by the inferior Court. See State, ex rel. Northern Ohio Telephone Co., v. Winter (1970) 23 Ohio St. 2d 6. See, also, Hall v. American Brake Shoe Co. (1968), 13 Ohio St. 2d 11, 13.

Again, just as in the instant matter, that all of the Judges of the Cleveland Municipal Court, under Sup. R. 4.02, were not consulted to vote on upholding or overturning the Administrative Orders of Judge Adrine is not relevant, since neither Judge Adrine nor those judges have the jurisdiction or authority to intrude upon the exclusive jurisdiction of this Court to issue discipline in connection with the conduct of judges under the Ohio Constitution. Likewise, neither Judge Adrine nor the entire Court may alter the way in which this Honorable Court's constitutional rule-making authority applies to the facts and circumstances of this matter. Thus, it would be in violation of this Court's longstanding precedent to require Judge Stokes to bring these void and ineffective Administrative Orders to a vote by the other Judges of the Cleveland Municipal Court.

In other circumstances this Court has applied this same principle that "in cases of a patent and unambiguous lack of jurisdiction, the requirement of a lack of an adequate remedy of law need not be proven because the availability of alternate remedies like appeal would be immaterial." See State, ex rel. Russo v. McDonnell, 110 Ohio St. 3d 144, 2006-Ohio-3459, 852 N.E.2d 145, para. 22 (the Court issued a peremptory Writ of Prohibition to prevent the Administrative Judge of the Cuyahoga Court of Common Pleas from compelling or facilitating a jury trial in a civil case under Ohio Revised Code §2701.10.)

Additionally, in one of the litany of DeRolph cases, a peremptory Writ of Prohibition was issued in connection with the Common Pleas Court holding a compliance conference in

connection with the DeRolph Plaintiffs' motion. State v. Lewis, 99 Ohio St. 3d 97, 2003-Ohio-2476, 789 N.E.2d 195, para. 18. (this Court specifically determined that Judge Lewis and the Common Pleas Court "*patently and unambiguously* [lacked] jurisdiction over the DeRolph Plaintiffs' Motion for a Compliance Conference. As such the peremptory writ of prohibition was granted.") See also State ex rel. Morenz v. Kerr, 104 Ohio St. 3d 148, 2004-Ohio-6208, 818 N.E.2d 1162, para. 14. (this same rule was applied in a situation where an Ohio Court was prevented from exercising jurisdiction in a child-custody case which was already pending in the court of another state.)

As is evident from this Court's well-established precedent, it is erroneous to conclude that Relator, in the instant matter, was required to exhaust available remedies under Sup. R. 4.02. There is an unambiguous and patent lack of jurisdiction on the part of Respondent in connection with his issuance of the Administrative Orders which, on their face, demonstrates his intent to usurp the disciplinary jurisdiction of this Court, as well as its rule-making authority. As such, it is respectfully submitted that Relator's Motion for Reconsideration should be granted

B. Converting Respondent's Motion for Clarification Into A Motion for Reconsideration of the Issuance of the Alternative Writ of Prohibition was Unfair to Relator And a Violation of Her Right to Due Process

In its Order, this Court has declared that Respondent's Motion for Clarification of his duties to stay the Administrative Orders which were the subject of the Alternative Writ of Prohibition issued by this Honorable Court on September 3, 2014 (App. B), was treated as a Motion for Reconsideration. It is clear that this Court deemed it appropriate to reconsider the issuance of the Alternative Writ of Prohibition by treating the Motion for Clarification as a Motion for Reconsideration. (App. A) Yet, the Motion for Clarification did not raise the issue of the availability of remedies to be exhausted so it could have been addressed by Relator in the

Reply. As such, to dismiss the “Petition”⁴ was unfair to Relator and a violation of her right to Due Process under the 5th and 14th Amendments of U.S. Constitution.

Judge Adrine issued the Administrative Orders without notice and an opportunity to be heard and object in violation of Relator’s Due process rights. So also, this Court has dismissed the Alternative Writ of Prohibition, treating the Motion for Clarification as a Motion for Reconsideration, without notice and an opportunity to be heard.

An elementary and fundamental requirement of Due Process in any proceeding which is to be accorded finality is notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. Milliken v. Meyer, 311 U.S. 457; Grannis v. Ordean, 234 U.S. 385; Priest v. Las Vegas, 232 U.S. 604; Roller v. Holly, 176 U.S. 398

Armstrong v. Manzo, 380 U.S. 545, 549, 85 S.Ct. 1187, 14 L.Ed.2d 62, 33 (1965) See also, Matthews v. Eldridge, 424 U.S. 319, 334, 96 S.Ct. 893, 902, 47 L.Ed.2d 18 (1976). “[D]ue process, unlike some legal rules, is not a technical conception with a fixed content unrelated to time, place and circumstances Due process is flexible and calls for such procedural protection as the particular situation demands.” Certainly, in such an important case where a lower court is alleged to have acted without jurisdiction and authority, unconstitutionally usurping the disciplinary role of the Ohio Supreme Court, Relator should have been afforded notice of this Court’s intention to treat the Motion for Clarification as a Motion to Reconsider the Issuance of the Alternative Writ of Prohibition and an opportunity to respond.

In this regard, Relator responded specifically to the issues raised in the Motion for Clarification when she filed the Reply. Relator intentionally did not argue issues associated with the merits of the Alternative Writ, since that was not the point or substance of the Motion for

⁴ In the November 19, 2014 Order, Relator’s Complaint is referred to as a “Petition” and Relator is referred to as “Petitioner.”

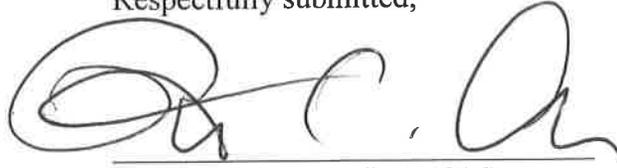
Clarification. Although Judge Adrine instituted the Administrative Orders with no difficulty, he argued the alleged difficulties he would have in removing the effect of such Administrative Orders, impeding the status quo, which prevented Judge Stokes from presiding over her criminal docket, among other issues. In the Reply, Judge Stokes pointed out that Judge Adrine's Order of September 17, 2014, issued after the Alternative Writ of Prohibition, did not restore the status quo which existed prior to the issuance of the Administrative Orders of March 14, 2014. In fact, the September 17, 2014 Order failed to vacate any of the prior Administrative Orders.

Thus, this Honorable Court dismissed the Alternative Writ of Prohibition, treating Respondent's Motion for Clarification as a Motion for Reconsideration, without notice to Relator and providing her an opportunity to respond. In so doing, this Court violated Relator's right to Due process under the 5th and 14th Amendments to the U.S. Constitution.

III. CONCLUSION

Accordingly, for the foregoing reasons, Relator respectfully requests that this Honorable Court reconsider the Order of November 19, 2014. Upon reconsideration, Relator requests that the Alternative Writ of Prohibition be reinstated and that the Court provide specific rulings on Respondent's Motion for Clarification, Relator's Motion to Show Cause and Relator's Alternative Writ of Prohibition.

Respectfully submitted,



Richard C. Alkire (#0024816)
Dean Nieding (#0003532)

RICHARD C. ALKIRE CO., L.P.A.
250 Spectrum Office Building
6060 Rockside Woods Boulevard
Independence, Ohio 44131-2335
(216) 674-0550 / Fax: (216) 674-0104

Attorneys for Relator
The Honorable Angela R. Stokes

NOV 2 8 REC'D

FILED

ALMERE
The Supreme Court of Ohio

NOV 19 2014

CLERK OF COURT
SUPREME COURT OF OHIO

State ex rel. the Honorable Angela R.
Stokes

Case No. 2014-0467

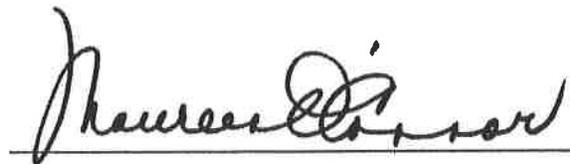
v.

ENTRY

The Honorable Ronald B. Adrine and the
Honorable Mabel M. Jasper

This cause came for further consideration upon the filing of respondent's motion for clarification of respondent's obligations pursuant to the court's alternative writ. It is ordered by the court that the motion for clarification shall be treated as a motion for reconsideration. Upon consideration thereof, it is ordered that the motion is granted and the petition is dismissed. The petitioner failed to exhaust available remedies under Sup.R. 4.02.

It is further ordered that relator's motion to show cause why respondent should not be held in contempt for failing to comply with this court's alternative writ is denied.



Maureen O'Connor
Chief Justice

FILED

SEP 03 2014

CLERK OF COURT
SUPREME COURT OF OHIO

The Supreme Court of Ohio

State ex rel. the Honorable Angela R.
Stokes

v.

The Honorable Ronald B. Adrine and the
Honorable Mabel M. Jasper

Case No. 2014-0467

IN QUO WARRANTO,
MANDAMUS, AND PROHIBITION

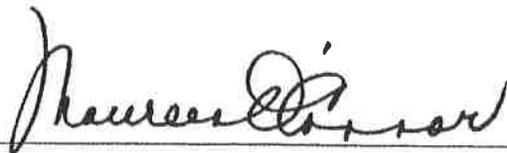
ENTRY

This cause originated in this court on the filing of a complaint for writs of quo warranto, mandamus, and prohibition.

Upon consideration of respondents' motion to dismiss, it is ordered by the court that the motion is granted in part and the Honorable Mabel M. Jasper is dismissed as a respondent.

It is further ordered by the court, sua sponte, that the writs of quo warranto and mandamus are dismissed, and an alternative writ of prohibition is granted and the following briefing schedule is set for presentation of evidence and filing of briefs pursuant to S.Ct.Prac.R. 12.05:

The parties shall file any evidence they intend to present within 20 days of the date of this entry; relator shall file a brief within 10 days of the filing of the evidence; respondent shall file a brief within 20 days after the filing of relator's brief; and relator may file a reply brief within 7 days after filing of respondent's brief.



Maureen O'Connor
Chief Justice

Ex. B

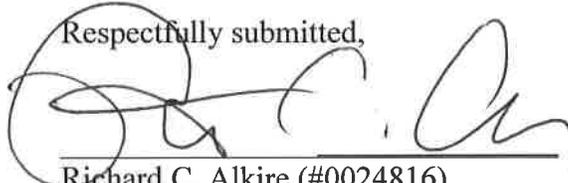
CERTIFICATE OF SERVICE

The foregoing RELATOR'S MOTION FOR RECONSIDERATION OF NOVEMBER 19, 2014 ORDER DISMISSING THE ALTERNATIVE WRIT OF PROHIBITION, CONVERTING THE MOTION FOR CLARIFICATION OF RESPONDENT TO A MOTION FOR RECONSIDERATION, GRANTING THE SAME, AND DENYING RELATOR'S MOTION TO SHOW CAUSE WHY RESPONDENT SHOULD NOT BE HELD IN CONTEMPT FOR FAILING TO COMPLY WITH THIS COURT'S ALTERNATIVE WRIT has been e-filed with the Clerk of the Ohio Supreme Court and sent via email this 1st day of December, 2014 to:

Alvin E. Mathews, Jr. (0038660)
Gerhardt A. Gosnell II (0064919)
James E. Arnold & Associates, L.P.A.
115 West Main Street, Suite 400
Columbus, OH 43215
amathews@arnlaw.com
ggosnell@arnlaw.com

Counsel for Respondent,
The Honorable Ronald B. Adrine and the
Honorable Mabel M. Jasper

Respectfully submitted,



Richard C. Alkire (#0024816)
Dean Nieding (#0003532)