

ORIGINAL

IN THE SUPREME COURT OF OHIO

INNKEEPER MINISTRIES, INC. : Case No. 2014-0490

Appellee :

v. : On Appeal from the Ohio Board of
Tax Appeals

TAX COMMISSIONER, STATE OF OHIO :

Appellant :

MOTION FOR CONTINUANCE OF ORAL ARGUMENT

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Now comes Appellee Innkeeper Ministries who respectfully moves the Court to reschedule the Oral Argument of March 17, 2015 upon grounds contained in the Memorandum hereinafter following.

Respectfully submitted,
Jay C. Bennett, Counsel of Record



COUNSEL FOR APPELLEE,
INNKEEPER MINISTRIES, INC.

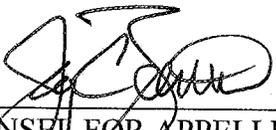
MEMORANDUM

Appellee's counsel received the Notice of Oral Argument on the afternoon of January 20, 2015 and immediately called the clerk's office of the Supreme Court, concerning a pre-existing scheduling conflict. The clerk instructed to send a letter requesting rescheduling. Appellee's counsel sent a letter requesting the rescheduling via Federal Express, next day delivery. Upon the receipt of the same on January 22, 2015, the Clerk called Appellee's counsel's office to inform said counsel that a Motion for Continuance is required rather than the letter.

Appellee's counsel is scheduled to be in Phoenix, Arizona beginning March 9th through March 20th. All travel expenses have been paid and lodging has been reserved a year in advance making it virtually impossible to reschedule. Appellee's counsel has been a sole practitioner for 40 years and has no partner or associate that can appear in his stead. Upon counsel's inquiry, opposing counsel stated he has no objection to said request.

Based upon the foregoing Appellee respectfully requests that said Oral Argument be rescheduled at the discretion of the Court.

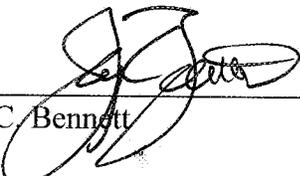
Respectfully submitted,
Jay C. Bennett, Counsel of Record



COUNSEL FOR APPELLEE,
INNKEEPER MINISTRIES, INC.

Certificate of Service

I certify that a copy of this brief was sent by ordinary U.S. mail and email to counsel of record for Appellant, David D. Ebersole, Assistant Attorney General, 30 E. Broad Street, 25th Floor, Columbus, Ohio 43215-3428, this 22nd day of January, 2015.



Jay C. Bennett
COUNSEL FOR APPELLEE,
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