

Case No. 2014-1761

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**Supreme Court  
of the State of Ohio**

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STATE OF OHIO *ex rel.*  
EMILIE DiFRANCO,

Relator-Appellant,

v.

CITY OF SOUTH EUCLID, OHIO, and KEITH A. BENJAMIN,

Respondents-Appellees,

and

MICHAEL P. LOGRASSO,

Appellee.

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**MOTION OF RELATOR-APPELLANT  
FOR EXNTENION OF TIME TO FILE REPLY BRIEF**

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*Counsel for Relator-Appellant*

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

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

*Counsel for Respondents-Appellees*

**Michael P. Lograsso (0058557)**  
*LAW DIRECTOR, CITY OF SOUTH EUCLID*  
1349 South Green Road  
South Euclid, OH 441121  
(216) 381-0400

**Vincent A. Feudo**  
**Michael E. Cicero**  
*NICOLA, GUDBRANSON & COOPER, LLC*  
1400 Republic Building  
25 West Prospect Avenue  
Cleveland, OH 44115  
(216) 621-7227

Pursuant to S. Ct. R. Prac. 3.03(B)(2)(a)(ii), the State of Ohio, by and on relation to Relator Emilie DiFranco, hereby requests a 10-day extension of time in which to file the Reply Brief herein. Said brief is currently due on Thursday, January 29, 2015, and this request would have that brief due on Monday, February 9, 2015. No prior extensions of time have been granted to Relator.

This request is sought in light of the current work demands of undersigned counsel, which has been compounded by a recent illness of undersigned counsel. Counsel for Appellants also has several other active matters pending in federal and state court, including *Burk v. Bulp*, U.S. District Court for the Southern District of Ohio, Case No. 1:14-CV-835; *State ex rel. DiFranco v. City of South Euclid*, Ohio Supreme Court, Case No. 2014-1761; *Woodward Construction v. For1031 Summit Woods I, LLC*, First District, Case No. C-14-00145; *Magda v. Ohio Elections Comm'n*, Tenth District, Case No. 14-AP-00929, as well as other time-sensitive matters presently being prepared.

This extension will provide Relator-Appellant the time necessary to file a reply brief that fully addresses and rebuts the arguments posited by Appellees. Additionally, in light of the issue herein, no party will be prejudice and immediacy is not an issue.

### **CONCLUSION**

Based upon the foregoing, it is respectfully requested that Appellant-Relator be granted the requested 10-day extension to file her Reply Brief so that it is due on Monday, February 9, 2015.

Respectfully submitted,

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

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 e-mail on the 28th day of January 2015:

Michael P. Lograsso  
Law Director, City of South Euclid  
1349 South Green Road  
South Euclid, Ohio 44121  
*MLograsso@seuclid.com*

Vincent A. Feudo  
Michael E. Cicero  
Nicola, Gudbranson & Cooper, LLC  
1400 Republic Building  
25 West Prospect Avenue  
Cleveland, OH 44115  
*feudo@nicola.com*  
*cicero@nicola.com*

/s/ Curt C. Hartman