

IN THE SUPREME COURT OF OHIO

MARVIN PATTON III

CASE NO.

Appellee

On Appeal From the Ninth
Appellate District, Medina, Ohio

Vs.

VANESSA A. HICKLING-PATTON

Court of Appeals
Case No. 13 CA 0071-M

Appellant

MOTION FOR RECONSIDERATION
OF APPELLANT VANESSA A. HICKLING-PATTON

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PRO SE APPELLEE

IN THE SUPREME COURT OF OHIO

MARVIN PATTON III

Appellee

vs.

VANESSA A. HICKLING-PATTON

Appellant

CASE NO. 14-1427

On Appeal From the Ninth
Appellate District, Medina,
Ohio

Court of Appeals
Case No.: 13 CA 0071-M

MOTION FOR
RECONSIDERATION

Pursuant to S.C.T. Pract. R. 18.02 (B)(1), Appellant, Vanessa A. Hickling-Patton, hereby moves this Honorable Court to reconsider its order Journalized on January 28, 2015, refusing to grant Jurisdiction to hear a discretionary appeal from the lower Court's decision in this case. The grounds for this motion are set forth in the attached memorandum.

Respectfully Submitted,

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MEMORANDUM OF THE LAW

Where the Trial Court has left out or ignored certain details paramount to the issue of custody in divorce, the decision not to hear this case is a matter of great public concern to any individual fighting for a divorce and custody of their minor children. More specifically, there were numerous examples cited by the Appellant where the Trial Court's finding was inconsistent with the testimony.

1. That the children had regressive behavior.
2. A weakness of the Mother's ability to care for the children was directly related to the Court failing to order support.
3. The finding that the Mother did not attend school conferences was a direct result of the lack of communication.
4. The Court found that she took care of the children a few days a week when actually the Mother would take care of them a weeks at a time.

Allowing a Trial Court's findings which are in conflict with a transcript of the proceedings contain so many inaccuracies concerning the children and basing custody to the other parent as a result of those inconsistencies/inaccuracies is a matter of great public concern. The Appellant is arguing to this Court that her rights to due process were violated by the Court not considering/ignoring/misstating important factors concerning the

children's custody. The Trial Court have attributed her ability not to be employed and her lack of a stable housing on a fault of hers. Lack of stable housing was because Appellee failed to support. The evidence presented to the Trial Court was that the Appellant did acted in the best interest of the children who were spirited away by Appellee at the commencement of the case. This Court recognized that the marriage relationship and the stability of laws, would respect that relationships are matters of public concern, JELM vs. JELM, 155 OH ST 226,230 (Ohio, 1951). We are asking this Court is to reconsider exercise its discretionary jurisdiction to provide the Appellant, with the due process which the Ohio Constitution entitles her to.

SERVICE

A copy of the within Motion has been sent by US Mail this day of February, 2015, to Marvin Patton, III, at 2086 Dry Ridge Road, Grove City, OH 43232.



L. Ray Jones
Attorney at Appellant