

## In the Supreme Court of Ohio

State of Ohio, \* Case No. 2014-0941  
Plaintiff-Appellant, \*  
\*  
v \*  
\*  
Derrell Shabazz, \*  
Defendant-Appellee. \*

---

THE OHIO ASSOCIATION OF CRIMINAL DEFENSE LAWYERS' REQUEST TO  
PARTICIPATE IN ORAL ARGUMENT AS AMICUS CURIAE

---

Christopher J. Pagan (0062751)  
Repper, Pagan, Cook, Ltd.  
15 01 First Avenue  
Middletown, OH 45044  
Tel. 513.424.1823  
Fax 513.424.3135  
E-Mail cpagan@cinci.rr.com  
*Counsel for Amicus OACDL*

—and—

Timothy McGinty  
Cuyahoga County Prosecutor  
Christopher Schroeder (0089855)  
Anna Faraglia (0067420)  
Assistant Prosecutors  
1200 Ontario Street  
Cleveland, OH 44113  
Tel. 216.443.7733  
*Counsel for State of Ohio*

Reuben Sheperd  
11510 Buckeye Road  
Cleveland, OH 44104  
Tel. 216.721.7700  
*Counsel for Derrell Shabazz*

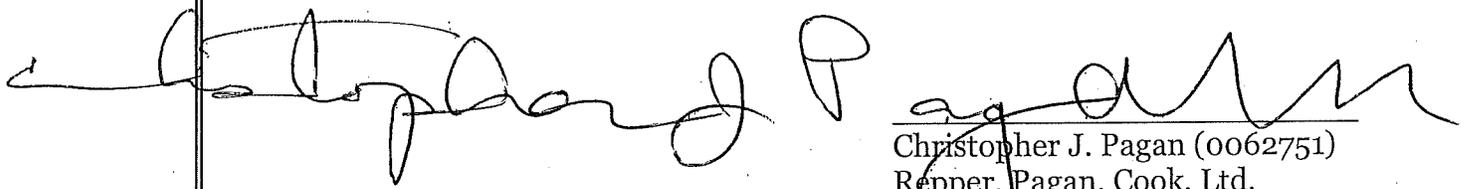


Repper, Pagan,  
& Cook, Ltd.  
Attorneys at Law  
1501 First Avenue  
Middletown, OH 45044  
Phone: 513.424.1823  
FAX: 513.424.3135

**THE OHIO ASSOCIATION OF CRIMINAL DEFENSE LAWYERS'  
REQUEST TO PARTICIPATE IN ORAL ARGUMENT AS AMICUS  
CURIAE**

Pursuant to S.Ct.Prac.R. 17.06, amicus curiae the Ohio Association of Criminal Defense Lawyers request leave to participate in oral argument scheduled 24 June 2015. Counsel for the appellee, whose position the *amicus curiae* supports, has been notified and consents to sharing oral-argument time.

Respectfully submitted,



Christopher J. Pagan (0062751)  
Repper, Pagan, Cook, Ltd.  
1501 First Avenue  
Middletown, Ohio 45044  
Tel. 513-424-1823  
Fax 513-424-3135  
E-mail: [cpagan@cinci.rr.com](mailto:cpagan@cinci.rr.com)  
*Counsel for amicus curiae*  
OACDL



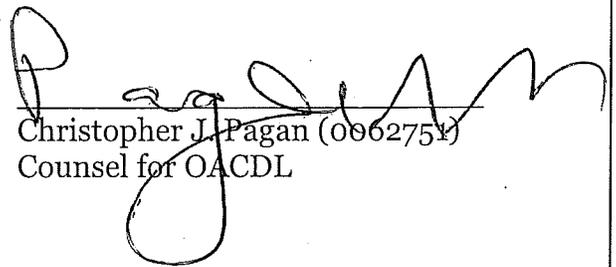
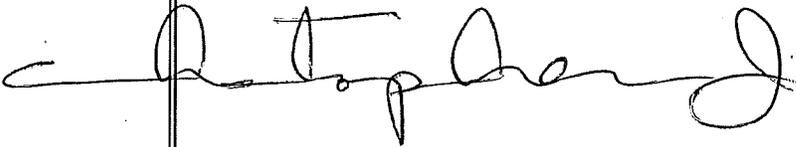
Repper, Pagan,  
& Cook, Ltd.  
Attorneys at Law  
1501 First Avenue  
Middletown, OH 45044  
Phone: 513.424.1823  
FAX: 513.424.3135

**CERTIFICATE OF SERVICE**

This undersigned hereby certifies that a copy of the foregoing Request to Participate in Oral Argument was delivered to the following counsel by regular United States mail, this March, 2015:

Christopher Schroeder (0089855)  
Anna Faraglia (0067420)  
Assistant Prosecutors  
1200 Ontario Street  
Cleveland, OH 44113  
Tel. 216.443.7733  
*Counsel for State of Ohio*

Reuben Sheperd  
11510 Buckeye Road  
Cleveland, OH 44104  
Tel. 216.721.7700  
*Counsel for Derrell Shabazz*



Christopher J. Pagan (0062751)  
Counsel for OACDL



**Repper, Pagan,  
& Cook, Ltd.**  
Attorneys at Law  
1501 First Avenue  
Middletown, OH 45044  
Phone: 513.424.1823  
FAX: 513.424.3135