

**IN THE SUPREME COURT OF OHIO**

<b>EDIN AGIC,</b>	:	Case No. 2014-1924
	:	
Plaintiff—Appellant,	:	On Appeal from the Cuyahoga
	:	County Court of Appeals
v.	:	Eighth Appellate District
	:	
<b>NATL. UNION FIRE INS. CO. OF</b>	:	C.A. Case No. CA-13-100679
<b>PITTSBURGH, et al.,</b>	:	
	:	
Defendants—Appellees.	:	

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**MOTION FOR RECONSIDERATION OF DECISION DECLINING JURISDICTIONAL  
APPEAL OF PLAINTIFF-APPELLANT EDIN AGIC**

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Pursuant to Sup.Ct.Prac.R. 18.02, Appellant Edin Agic, by and through the undersigned counsel, hereby moves this Honorable Court to reconsider its denial of jurisdiction in this case. This case presents a matter of public and great general interest to those practicing in Cuyahoga County Court of Common Pleas, as well as the Eighth District Court of Appeals. Practitioners in these jurisdictions deserve a clear rule of law applicable to all litigants. Plaintiffs in these jurisdictions are constitutionally entitled to their due process rights to have their day in court. Subsequent cases decided by lower courts cited by opposing counsel in their memoranda in opposition to Appellant's Memorandum in Support of Jurisdiction only further demonstrate the erosion of Plaintiffs' due process rights by eliminating both the mutuality of the issues and the parties, expanding collateral estoppel beyond its original scope, creating inequitable results for unsuspecting plaintiffs.

For these reasons, as well as those set forth in Appellant Edin Agic's Memorandum in Support of Jurisdiction, Appellant Edin Agic moves this Honorable Court to reconsider its April 29, 2015 decision declining jurisdiction in this matter.

Respectfully submitted,

*/s/Kristina Melomed*

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**CERTIFICATE OF SERVICE**

A copy of the foregoing Motion to Reconsider was filed electronically on this 4<sup>th</sup> day of May, 2015. Copies have been forwarded the same date via email to the following parties below:

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