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IN THE SUPREME COURT OF OHIO  
CASE NO.: 2015-0604

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**Original Action for Writ of Prohibition**

STATE OF OHIO, ex rel. CHESTER TOWNSHIP AND THE CHESTER TOWNSHIP TRUSTEES MICHAEL J. PETRUZIELLO, BUD KINNEY, AND KEN RADTKE, JR.

Relators

vs.

HONORABLE TIMOTHY J. GRENDELL, JUDGE  
GEAUGA COUNTY COURT OF COMMON PLEAS, PROBATE DIVISION

Respondent

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**RELATORS CHESTER TOWNSHIP AND THE CHESTER TOWNSHIP TRUSTEES  
MICHAEL J. PETRUZIELLO, BUD KINNEY, AND KEN RADTKE, JR.'S  
MOTION FOR ORAL ARGUMENT**

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Timothy J. Grendell, Judge Geauga County  
Court of Common Pleas, Probate Division*

Relators Chester Township and the Chester Township Board of Trustees Michael J. Petruziello, Bud Kinney and Ken Radtke, Jr. respectfully request oral argument. This case is suitable for oral argument because it presents a matter of great importance, not only to these litigants but also to probate courts, Revised Code Chapter 1545 applicants, and park districts that function (and were created) under that Chapter. While the statutory law is clear, the Relators believe that oral argument would be helpful to this Court in adjudicating the issue of whether a probate court improperly exercises subject-matter jurisdiction when it takes action against a Revised Code 1545.02 applicant whose application had been granted.

Respectfully submitted,

MAZANEC, RASKIN & RYDER Co., L.P.A.

*/s/ Frank H. Scialdone*

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**CERTIFICATE OF SERVICE**

A copy of the foregoing Motion for Oral Argument has been sent by regular U.S. Mail, postage prepaid on July 21, 2015 to the following:

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