

ORIGINAL

IN THE THE SUPREME COURT OF OHIO

STATE OF OHIO

Plaintiff – Appellee

On Appeal From the Cuyahoga
County Court of Appeals
Eighth District
C. A. No. 100805

Trial Court Case No.13 - 574201-A

vs.

ANDREY L. BRIDGES

Defendant – Appellant

SUPREME COURT

CASE NO. 2015- 0718

**MOTION FOR RECONSIDERATION PURSUANT TO S.CT. PRAC. R.18.02
26 (B)**

ANDREY L. BRIDGES - #650-493
501 THOMPSON RD
P.O. BOX 8000
CONNEAUT, OHIO 44030

DEFENDANT- APPELLANT, *PRO SE*

CUYAHOGA COUNTY PROSECUTOR
1200 ONTARIO STREET
CLEVELAND, OHIO 44113

COUNSEL FOR APPELLEE: STATE OF OHIO

RECEIVED

JUL 29 2015

CLERK OF COURT
SUPREME COURT OF OHIO

FILED

JUL 29 2015

CLERK OF COURT
SUPREME COURT OF OHIO

The appellant is requesting this Honorable Supreme Court to reconsider this appeal since it is a case of public or great general interest and involves several substantial constitutional questions. In this present case, *The State of Ohio v. Andrey L. Bridges*, **Case No. 2015- 0718 (2014 - 2074 Cuyahoga App. 100805)**, . Hereinafter, referred to as "Bridges". This cause presents critical issues for review:

Bridges asks this Court to reconsider its decision to dismiss his appeal and instead remand the case for application of the supreme Court previous decisions in *McMann v. Richardson* (1970), 397 U.S. 759, 771, 90 S. Ct. 1441, 25 L. Ed. 2d 763, fn. 4. And *Powell V. Alabama*. 287 U.S. 45, 53 S. Ct 55, 77 L. Ed. 158 (1932).

This day this cause comes before the Supreme Court of Ohio on a timely filed Application For Reconsideration, pursuant to Local S. Ct rule XI, Section (2) (a) (1) and (2) VIA Case Law of *Strickland v. Washington* (1984), 466 U.S. 668, 104 S. Ct. 2052, 80 L. Ed. 2d 674. and Case Law *State v. Ayala* (1996), 111 Ohio App.3d 627, 631, 676 N.E.2d 1201.

On July 22nd 2015 this Supreme Court, filed an Entry stating that: Upon consideration of jurisdictional memorandum filed in this case, the court declines jurisdiction to hear the case. (See Entry Attached). According to Local S. Ct. Rule XI Section 2 (a) and (2), provides that an application for reconsideration shall be filed within 10 days after the Supreme Court's Judgment entry is filed with the Clerk and may be granted only in cases where "The Supreme Court's refusal to grant jurisdiction to hear a discretionary appeal... Or "The sue sponte dismissal of a case." See Local S. Ct. Rule XI, Sec. 2 (a) (1) and (2).

In this case sub judge Appellant filled a Notice of Appeal and memorandum In Support of Jurisdiction with the Supreme Court of Ohio to appeal the Judgment of the Eighth District Court of Appeals. Pertaining to his 26 (B) filing in violation of all his U.S Constitutional rights including ineffectiveness of trial and appellant counsel.

Ineffective assistance of counsel appears face on the record. When this court takes jurisdiction the prongs of Strickland V. Washington could be met.

Therefore, in light of the above foregoing reasons, the Supreme Court of Ohio should find Appellant Motion for reconsideration to be found "well taken" and Grant Bridges the right to appeal as a discretionary appeal to this Supreme Court.

Appellant additionally ask the Ohio Supreme Court to Grant Reconsideration in this case on grounds that the Appellant did assert numerous substantial Constitutional questions, upon which a right must be granted. Especially in light of the fact that this court never accepted attached materials to appellant motion to stay or have accepted the motion to stay when, On July 8th 2015 the appellant requested a stay until the Eighth District Court of the Appeals made a judgment or Ruling on the cases that was brought forth in the motion for stay.

Appellant have not heard any thing back concerning the stay, which appellant can establish a receipt from the institutional account record that the appellant had in fact sent the stay, as well as with the notary to the requested filing. The stay was in fact critical to the 26 (B) since the appellant raised ineffective assistance of counsel and could have shown this court the lack of counsel from the stay as well as saving face to the record.

Also It should be clearly noted that it is fatally flawed by not stating that the memorandum did not involve a substantial constitutional question. In this case sub judice, Appellant overwhelmingly demonstrated a substantial Constitutional question raising clear violations under the all Amendments to the United States Constitution, as far as ineffective assistance of counsel and all other Amendments.

Accordingly, in light of the above foregoing facts Appellant/ Bridges did demonstrate a substantial constitutional question, and all Amendments to the United states Constitution,

Appellant ask this honorable Supreme Court to Grant Reconsideration on this claim as well.

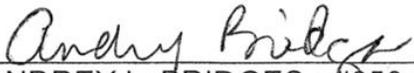
Appellant ask the Court to re -read his original Memorandum In Support of Jurisdiction filled previously in this case, and grant the appellant jurisdiction to appeal in this case based on those reasons asserted in his jurisdictional memoranda, as well as to Grant jurisdiction that is asserted through this motion for Reconsideration, i. e., discretionary appeal as well as the rights under the ohio Constitution.

The major reasoning for this court to accept jurisdiction of this case is due to the fact that if these issues are not addressed the claims raised are capable of repetition, "yet evading review". *Southern Pacific Terminal Co. v. ICC*, 219 U.S. 498, 31 S. Ct. 279, 55 L. Ed. 310 (1911). *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S. Ct. 2781, 61 L. Ed. 2D 560 (1997).

Conclusion

Appellant asks this Supreme court to (1) Take a closer look at all the evidence in this case. (2) Review all of the amicus briefs filed by the appellant regarding this case and the issues presented, and (3) To do a thorough review about the events played in this case and the events that transpired to the conviction, and decide the constitutional claims that is of great public interest and has great constitutional questions regarding this case at bar.

Sincerely submitted,


ANDREY L. BRIDGES - #650-493
501 THOMPSON RD
CONNEAUT, OHIO 44030

IN THE THE SUPREME COURT OF OHIO

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MEMORANDUM IN SUPPORT OF JURISDICTION OF APPELLANT ANDREY L. BRIDGES, has been sent by U.S. Mail, first-class postage prepaid, to the Cuyahoga County Prosecutor, 1200 Ontario Street Cleveland, Ohio 44113, On this 24th day of July 2014


Andrey L. Bridges - #650-493

IN THE THE SUPREME COURT OF OHIO

AFFIDAVIT OF IDIGENCE

CASE NO. 2015- 0718

I, Andrey L. Bridges, do hereby state that I am without the necessary funds to pay the costs of this action for the following reason (s) :

I am currently incarcerated since November 21, 2013. I work at the prison but receive only 13.50 per. Month for state pay. I am unable to afford the payment or the cost to pay for the cost for filings, Pursuant to Rule 15. 3 (A), of the Rules of Practice of The Supreme Court Of Ohio I am requesting that the filling fee and security deposit, if applicable be waived.

Andrey Bridges
AFFIANT

Sworn to or Affirmed and Subscribed in my presence on this 24 day of July 2015

NOTARY PUBLIC *Jennifer Maki*



JENNIFER MAKI
Notary Public, State of Ohio
Recorded in Ashtabula County
My Commission Expires
April 25, 2017

MY COMMISION EXSPIRES

S. Ct. Prac.R. 15.3 (A) requires your affidavit of indigence to state the reasons you are unable to pay the docket fees and or security deposit. Failure to state specific reasons that you are unable to pay will result in your affidavit being rejected for filing by the clerk.

** This affidavit must be executed not more than six months prior to being filed in the Supreme Court in order to comply with S. Ct. Prac. R.15.3 (A). Affidavits not in compliance with that section will be rejected for filing by the Clerk.

IN THE THE SUPREME COURT OF OHIO

CASE NO. 2015- 0718

APPENDIX

Journal Entry Opinion OF THE OHIO SUPREME
(July 22nd 2015)

The Supreme Court of Ohio

FILED

JUL 22 2015

CLERK OF COURT
SUPREME COURT OF OHIO

State of Ohio

v.

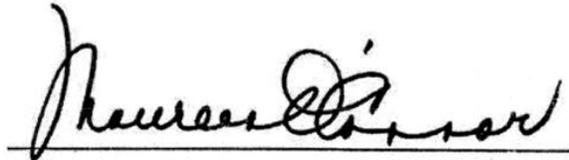
Andrey Bridges

Case No. 2015-0718

ENTRY

Upon consideration of the jurisdictional memoranda filed in this case, the court declines to accept jurisdiction of the appeal pursuant to S.Ct.Prac.R. 7.08(B)(4).

(Cuyahoga County Court of Appeals; No. 100805)



Maureen O'Connor
Chief Justice