

IN THE SUPREME COURT OF OHIO
2015

STATE OF OHIO,

Case No. 2015-1259

Plaintiff-Appellant,

-vs-

On Appeal from the
Franklin County Court
of Appeals, Tenth
Appellate District

SOLEIMAN MOBARAK,

Court of Appeals
Case No. 14AP-517

Defendant-Appellee.

MOTION TO EXPEDITE CONSIDERATION OF MOTION FOR STAY

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MEMORANDUM IN SUPPORT

The State respectfully requests that this Court expedite its consideration of the State’s motion for stay filed on July 31, 2015 (the defense responded August 4, 2015). Earlier this morning, an employee with the Bureau of Sentence Computation informed undersigned counsel that if a stay is not granted by 2:00 p.m. this afternoon, Mr. Mobarak will be released. If Mobarak is released at 2:00 p.m., and this Court thereafter grants the State’s motion for stay, then Mobarak would have been granted a release to which he was not entitled. Such an improper release would irreparably impair the State’s ability to enforce Mobarak’s sentence should this Court ultimately reverse the Tenth District’s decision.

Respectfully submitted,

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/s/ Seth L. Gilbert
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served on August 5, 2015, to Robert Behal via electronic mail at rbehal@behallaw.com.

/s/ Seth L. Gilbert
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