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Counsel for Respondent

Respondent, Angela Rochelle Stokes, hereby moves this Honorable Court for an Order granting her leave to file a Motion for Modification of the December 18, 2014 Order of Suspension. This motion is made pursuant to Gov. Bar R. V(19)(C)(1). Because significant events in connection with Respondent's ongoing discipline matter in Board of Professional Conduct Case No. 2013-057 (hereinafter "The Discipline Case") have occurred after January 17, 2015 (thirty days after the order was filed), leave is now sought to modify such Suspension Order.

Accordingly, for the foregoing reasons and those more fully set forth in the Memorandum attached hereto and incorporated herein by reference, as well as those expressed in the Memorandum in Support of Respondent's Corrected Motion to Dissolve the Interim Remedial Suspension Order of December 18, 2014 filed with this Honorable Court in the instant matter on August 11, 2015 (Supp. 1), incorporated herein by reference, Respondent respectfully requests this Honorable Court grant her leave to file a Motion for Modification of the December 18, 2014 Order of Suspension.

\* \* \*

Respectfully submitted,



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Attorneys for Respondent

**MEMORANDUM IN SUPPORT OF RESPONDENT'S MOTION FOR LEAVE TO FILE  
MOTION FOR MODIFICATION OF DECEMBER 18, 2014 ORDER OF SUSPENSION**

On December 18, 2014, this Honorable Court issued an Order (App. 1) suspending Respondent from the practice of law and from her elected position as a Judge of the Cleveland Municipal Court arising from Relator's Motion for an Immediate Interim Remedial Suspension Under Gov. Bar R. V(5a) (hereinafter "Relator's Motion") and after consideration of Respondent's Memorandum in Opposition to Relator's Motion for an Immediate Interim Remedial Suspension Under Gov. Bar R. V(5a) with Affidavit of the Honorable Angela Rochelle Stokes and its Attached Exhibits. (hereinafter "Respondent's Opposition")

At the time Relator's Motion was filed, the First Amended Complaint in The Discipline Case was pending. At no time after the December 18, 2014 Order of Suspension has Relator sought to amend such Complaint.

As explained in Respondent's recent Memorandum in Support of Respondent's Corrected Motion to Dissolve the Interim Remedial Suspension Order of December 18, 2014 (Supp. 1), Realtor's Motion was largely premised on the Affidavit of Ronald B. Adrine and also reference was made throughout his Memorandum in Support of Motion for Immediate Interim Remedial Suspension to the allegations of the First Amended Complaint.

In this regard, not only has Affiant Adrine's affidavit been shown to be inaccurate and largely unfounded as it relates to the particular instances of misconduct cited by Relator in Relator's Motion at Section 2 Specific Instances of Misconduct, also

allegations of the First Amended Complaint have been withdrawn during the formal hearing in the discipline case which commenced on February 26, 2015.

In this connection, as it relates to Count 1 of the Complaint which alleged that Respondent misused the human and economic resources of the Court, Realtor has withdrawn its allegation that Respondent misused the economic resources of the Court. (Supp. 2, Brown, Hearing Tr., April 8, 2015 pp. 298-302, 345)<sup>1</sup>

Likewise, as it relates to the sections of the First Amended Complaint asserting that Respondent's role in connection with Project Hope somehow violated the Judicial Cannons, those allegations have also been withdrawn. (Supp. 3, Adrine, Hearing Tr., April 10, 2015 pp. 2101-2108)<sup>2</sup>

Significantly, Respondent has been suspended without pay since December 18, 2014. At the time of the filing of the instant motion, approximately 8 months has elapsed. It is respectfully submitted that given the allegations of the First Amended Complaint, the fact that the bases of this Court's granting an interim remedial suspension, in part, have been shown to be inaccurate and unfounded by Affiant Adrine's own sworn testimony in deposition and at the formal hearing, and because substantial allegations of the Amended Complaint have been withdrawn due to testimony elicited thus far in the 14 days of formal hearing, Respondent asserts that her interim suspension is no longer warranted.

Accordingly, given the developments referenced above, all occurring after 30 days after the imposition of the Interim Remedial Suspension which is the subject of this

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<sup>1</sup> Excerpts of the Transcript of Proceedings in The Discipline case are reproduced and assembled in the Supplement hereto, filed simultaneously herewith for the Court's convenience.

<sup>2</sup> The page numbers for this portion of the transcript are out of sequence because this portion of the hearing was held on the record and before Judge Adrine's cross-examination.

Motion, Respondent respectfully asserts that it is appropriate for this Honorable Court to grant to her leave to file a Motion to Modify the Suspension Order of December 18, 2014.

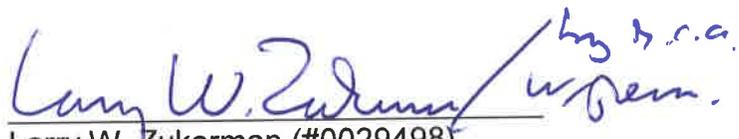
Respectfully submitted,



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Attorneys for Respondent

# APP. 1

# The Supreme Court of Ohio

FILED

DEC 18 2014

Disciplinary Counsel,  
Relator,  
v.  
Angela Rochelle Stokes,  
Respondent.

Case No. 2014-1905

CLERK OF COURT  
SUPREME COURT OF OHIO

ORDER

DEC 22 2014

ALERE

On November 4, 2014, and pursuant to Gov.Bar R. V(5a)(A)(1)(b), relator, disciplinary counsel, filed with this court a motion for immediate interim remedial suspension pursuant to Gov.Bar R. V(5a), alleging that respondent, Angela Rochelle Stokes, has engaged in conduct that violates the Ohio Rules of Professional Conduct, the Ohio Code of Professional Responsibility, and the Ohio Code of Judicial Conduct and poses a substantial threat of serious harm to the public and the administration of justice. Respondent filed a response, and this matter was considered by the court.

Upon consideration thereof and pursuant to Gov.Bar R. V(5a)(B), it is ordered and decreed that an interim remedial suspension is immediately entered against Angela Rochelle Stokes, Attorney Registration No. 00025650, last known business address in Cleveland, Ohio, and that the suspension be effective as of the date of this entry, pending final disposition of disciplinary proceedings predicated on the conduct threatening the serious harm. It is further ordered that the underlying disciplinary case in this matter is to proceed expeditiously.

It is further ordered that respondent immediately cease and desist from the practice of law in any form and that respondent is hereby forbidden to appear on behalf of another before any court, judge, commission, board, administrative agency, or other public authority.

It is further ordered that effective immediately, respondent is forbidden to counsel, advise, or prepare legal instruments for others or in any manner perform legal services for others.

It is further ordered that respondent is hereby divested of each, any, and all of the rights, privileges, and prerogatives customarily accorded to a member in good standing of the legal profession of Ohio.

It is further ordered that pursuant to Gov.Jud.R. III(7)(A), respondent is immediately suspended from judicial office without pay for the term of the suspension, pending further proceedings pursuant to law.

It is further ordered that before entering into an employment, contractual, or consulting relationship with any attorney or law firm, respondent shall verify that the attorney or law firm has complied with the registration requirements of Gov.Bar R. V(8)(G)(3). If employed pursuant to Gov.Bar R. V(8)(G), respondent shall refrain from direct client contact except as provided in Gov.Bar R. V(8)(G)(1) and from receiving, disbursing, or otherwise handling any client trust funds or property.

It is further ordered that pursuant to Gov.Bar R. X(13), respondent shall complete one credit hour of continuing legal education for each month, or portion of a month, of the suspension. As part of the total credit hours of continuing legal education required by Gov.Bar R. X(13), respondent shall complete one credit hour of instruction related to professional conduct required by Gov.Bar R. X(3)(B) for each six months, or portion of six months, of the suspension.

It is further ordered that respondent shall not be reinstated to the practice of law in Ohio until (1) respondent complies with the requirements for reinstatement set forth in the Supreme Court Rules for the Government of the Bar of Ohio, (2) respondent complies with this and all other orders issued by this court, (3) respondent complies with the Supreme Court Rules for the Government of the Bar of Ohio, and (4) this court orders respondent reinstated.

It is further ordered by the court that within 90 days of the date of this order, respondent shall reimburse any amounts that have been awarded by the Clients' Security Fund pursuant to Gov.Bar R. VIII(7)(F). It is further ordered by the court that if after the date of this order the Clients' Security Fund awards any amount against respondent pursuant to Gov.Bar R. VIII(7)(F), respondent shall reimburse that amount to the Clients' Security Fund within 90 days of the notice of that award.

It is further ordered that on or before 30 days from the date of this order, respondent shall do the following:

1. Notify all clients being represented in pending matters and any co-counsel of respondent's suspension and consequent disqualification to act as an attorney after the effective date of this order and, in the absence of co-counsel, also notify the clients to seek legal service elsewhere, calling attention to any urgency in seeking the substitution of another attorney in respondent's place;
2. Regardless of any fees or expenses due, deliver to all clients being represented in pending matters any papers or other property pertaining to the client or notify the clients or co-counsel, if any, of a suitable time and place where the papers or other property may be obtained, calling attention to any urgency for obtaining such papers or other property;
3. Refund any part of any fees or expenses paid in advance that are unearned or not paid and account for any trust money or property in his possession or control;
4. Notify opposing counsel or, in the absence of counsel, the adverse parties in pending litigation of his disqualification to act as an attorney after the effective date of this order and file a notice of disqualification of respondent with the court or agency before which the litigation is pending for inclusion in the respective file or files;
5. Send all notices required by this order by certified mail with a return address where communications may thereafter be directed to respondent;

6. File with the clerk of this court and disciplinary counsel of the Supreme Court an affidavit showing compliance with this order, showing proof of service of the notices required herein, and setting forth the address where respondent may receive communications; and
7. Retain and maintain a record of the various steps taken by respondent pursuant to this order.

It is further ordered that respondent shall keep the clerk and disciplinary counsel advised of any change of address where respondent may receive communications.

It is further ordered that all documents filed with this court in this case shall meet the filing requirements set forth in the Rules of Practice of the Supreme Court of Ohio, including requirements as to form, number, and timeliness of filings. All case documents are subject to Sup.R. 44 through 47, which govern access to court records.

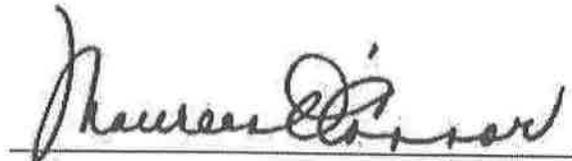
It is further ordered that service shall be deemed made on respondent by sending this order, and all other orders in this case, by certified mail to the most recent address respondent has given to the Office of Attorney Services.

It is further ordered that the clerk of this court issue certified copies of this order as provided for in Gov.Bar R. V(8)(D)(1), that publication be made as provided for in Gov.Bar R. V(8)(D)(2), and that respondent bear the costs of publication.

I HEREBY CERTIFY that this document is a true and accurate copy of the entry of the Supreme Court of Ohio filed December 18, 2014 in Supreme Court case number 2014-1405

In witness whereof I have hereunto subscribed my name and affixed the seal of the Supreme Court of Ohio on this 18th day of December, 2014

by Doris S. Paule, Deputy CLERK OF COURT



Maureen O'Connor  
Chief Justice

**CERTIFICATE OF SERVICE**

A copy of **RESPONDENT'S MOTION FOR LEAVE TO FILE MOTION FOR MODIFICATION OF DECEMBER 18, 2014 ORDER OF SUSPENSION** has been filed via e-filing with the Supreme Court of Ohio and a service copy e-mailed this 18<sup>th</sup> day of August, 2015 to:

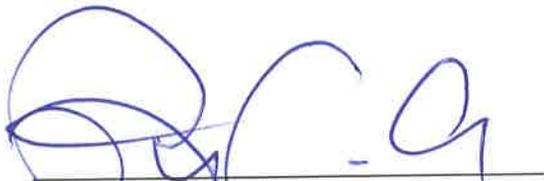
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