

ORIGINAL

OHIO SUPREME COURT

Cincinnati Bar Association

No. 2015-0481

v

Robert H. Hoskins (0068550)

Respondent.

ANSWER TO MOTION TO HOLD  
RESPONDENT IN CONTEMPT

Now comes Respondent, Robert H. Hoskins, responding to the Complaint in this matter as follows:

1. Admitted.
2. Respondent admits he participated in the call, but denies that identified himself as Mr. Mayes. Rather, respondent advised the Court that he expected Mr. Mayes to replace him in the case.
3. Respondent admits that he replied to Mr. Calkins' inquiry as to discovery responses by indicating that Plaintiff would require additional time to respond.
4. Admitted.
5. Admitted.
6. Admitted.
7. Respondent lacks the foundation to admit or deny this paragraph of the Complaint.
8. Respondent lacks the foundation to admit or deny this paragraph of the

**FILED**  
 OCT 05 2015  
 CLERK OF COURT  
 SUPREME COURT OF OHIO

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 OCT 05 2015  
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9. Admitted.
10. Respondent lacks the foundation to admit or deny this paragraph of the Complaint.
11. Respondent lacks the foundation to admit or deny this paragraph of the Complaint.
12. Respondent admits that he called Calkins office as pled.
13. Admitted.

#### COUNT TWO

14. Respondent admits that he agreed to represent Jeanetta Cook but states that his representation of her went beyond her custody case to include several contempt hearings filed by and against Ms. Cook.
15. Respondent admits that Ms. Cook's fee was paid thru a series of monthly payments, but denies that any of those payments were released to Respondent inasmuch as he was unable to represent her through the completion of her case.
16. Respondent last met in person with Ms. Cook in March 2015 although he spoke and corresponded with her in April and May 2015.
17. Admitted.
18. Respondent lacks the foundation to admit or deny this paragraph of the Complaint.
19. Admitted.

#### COUNT THREE

20. Admitted.
21. Admitted.

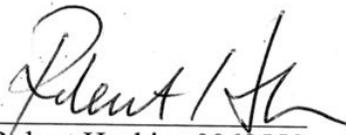
22. Admitted. . .
23. Admitted. Respondent initially believed that the suspension of his Ohio license ended when the Kentucky suspension that Ohio reciprocated terminated.
24. After Respondent finished deposing the deponent, he advised opposing counsel that he wanted to review his notes and to speak with his client. After Respondent reviewed his notes and spoke with his client, he advised opposing counsel that he had no further questions. Respondent believes that the parties went back on the record so that the deponent could testify as to whether he wanted to waive his signature to the deposition. Respondent denies that he asked anybody to leave after the deposition; rather, Respondent and his client sat in Respondent's office after the deposition was over for a thirty minute conversation while opposing counsel and the court reporter left on their own.
25. Admitted.
26. Admitted.

#### COUNT FOUR

27. Respondent he admits that he filed a petition for an adult adoption that was prepared by his friend, Mr. Houchell, using the forms that Mr. Houchell obtained from the Court's website. Respondent was not identified as an attorney for either the petitioners nor for the adoptee in those forms. Respondent paid the filing fee and was timely reimbursed by Mr. Houchell. Respondent was not the attorney of record in this case nor was he ever paid for his assistance in this matter.

28. Respondent admits that he appeared at the hearing at the request of his friend. Respondent further admits that when the Magistrate asked him to question the parties as to their petition to adopt an adult to whom they had formally been legal guardians, Respondent did so rather than telling the Court he was suspended from the practice of law.
29. Respondent admits that when the Magistrate asked him to question the parties as to their petition to adopt an adult to whom they had formally been legal guardians, Respondent did so rather than telling the Court he was suspended from the practice of law.
30. Respondent denies that he willfully contravened the Court's order.

Respectfully submitted,



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#### CERTIFICATE OF SERVICE

I certify that I mailed a copy of the foregoing to Rosemary Welsh, 301 E Fourth Street, Cincinnati, Ohio 45202, and Edwin Patterson, CBA, 225 E. 6<sup>th</sup> Street, 2<sup>nd</sup> Floor, Cincinnati, OH 45202 and Scott Drexel 250 Civic Center Drive, Suite 325, Columbus, Ohio 43215 on this 25<sup>th</sup> day of September, 2015.



Robert Hoskins 0068550