

ORIGINAL

IN THE OHIO SUPREME COURT

State ex rel. Theodore Jackson  
Appellant

-v-

Brigham Sloan, Warden  
Appellee

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Case No. 15-1477

MOTION TO SUPPLEMENT THE RECORD  
VIA S.Ct.Prac.R. 15.08

MEMORANDUM

The Appellant comes to this Court via the Authority of Ohio Constitution Article I §§1,2,16, in conjunction with United States Constitution Amendments 1st,5th,14th, seeking the fundamental right to be heard on these motions filed in the Eleventh District Court of Appeals case no. 2015-A-0028: 1.) **MOTION TO AMEND, MOTION FOR RELIEF AFTER JUDGMENT AND COMMON LAW MOTION FOR RECONSIDERATION** (Filed SEP. 28, 2015), this Amendment contains substantive changes i.e. quote "\*\*\*And adds: These Motion are maid via Civ.R. 60\*\*\*" This Court used states ex.(39) to deny Petition. Ex.(39) is Unconstitutional here-say, via Ohio Rules of Evidence 802\*\*\*. Further ex.(39) from alleged person Valerie Parkins is not sworn to via Affidavit, nor bears her signature\*\*\*."

The Appeals Court below has refused to rule on these Motions, so to preserve there grounds for relief the Appellant filed a Mandamus Complaint to compel that Court to rule on these Motions see State ex rel. Jackson V. Judges of Eleventh Appellate District, case no. 15-1609, to date no ruling. For transfer of Motion filed below on Sep. 28, 2015 I pray.

Respectfully submitted,

*Theodore Jackson*  
THEODORE JACKSON

P.O. BOX 8000 #590-406  
CONNEAUT, OHIO 44030

CERTIFICATE OF SERVICE

A copy of this Motion WAS SENT TO William H. Lamb, Asst. att. Gen., 441 Vine st., 1600 Carew Tower, Cincinnati, Ohio 45202, by U.S. mail 10-23-2015

*Theodore Jackson*  
THEODORE JACKSON, IN PRO SE

RECEIVED  
OCT 29 2015  
CLERK OF COURT  
SUPREME COURT OF OHIO

FILED  
OCT 29 2015  
CLERK OF COURT  
SUPREME COURT OF OHIO