

IN THE SUPREME COURT OF OHIO

State ex rel.	:	
Emilie DiFranco	:	Case No. 14-0831
	:	
Relator,	:	Original Action in Mandamus
	:	
v.	:	
	:	
City of South Euclid, et al.	:	
	:	
Respondents	:	
	:	

---

**AFFIDAVIT OF LEE WILLIAMS**

---

MICHAEL P. LOGRASSO (0058557) (COUNSEL OF RECORD)  
Director of Law, City of South Euclid  
1349 South Green Road  
South Euclid, Ohio 44121  
(216) 381-0400  
(216) 381-0364 – Fax  
[MLograsso@seuclid.com](mailto:MLograsso@seuclid.com)

VINCENT A. FEUDO (0019733)  
MICHAEL E. CICERO (0058610)  
Nicola, Gudbranson & Cooper, LLC  
1400 Republic Building  
25 West Prospect Avenue  
Cleveland, Ohio 44115  
(216) 621-7227  
(216) 621-3999 – Fax  
[feudo@nicola.com](mailto:feudo@nicola.com)  
[cicero@nicola.com](mailto:cicero@nicola.com)

COUNSEL FOR RESPONDENTS, THE CITY OF SOUTH EUCLID AND LEE WILLIAMS

EMILIE DIFRANCO

Pro se Relator

3867 W. 226<sup>th</sup> St.

Fairview Park, Ohio 44126

(440) 777-6865

[emdifranco@sbcglobal.net](mailto:emdifranco@sbcglobal.net)

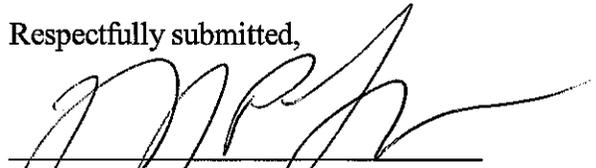
IN THE SUPREME COURT OF OHIO

State ex rel.  
Emilie DiFranco : Case No. 14-0831  
: :  
Relator, : **Submission of Evidence**  
: :  
v. : :  
City of South Euclid, et al. : :  
: :  
Respondents : :  
:

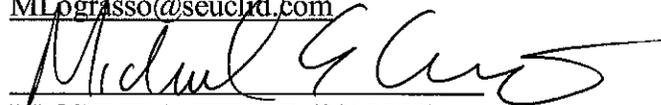
Now come the Respondents, the City of South Euclid and Lee Williams (“Respondents”), and submit the following affidavit for the Court’s consideration in the within matter:

1. Affidavit of Respondent Lee Williams is attached hereto as Exhibit A.

Respectfully submitted,



MICHAEL P. LOGRASSO (0058557)  
Director of Law, City of South Euclid  
1349 South Green Road  
South Euclid, Ohio 44121  
(216) 381-0400  
(216) 381-0364 – Fax  
[MLograsso@seuclid.com](mailto:MLograsso@seuclid.com)



VINCENT A. FEUDO (0019733)  
MICHAEL E. CICERO (0058610)  
Nicola, Gudbranson & Cooper, LLC  
1400 Republic Building  
25 West Prospect Avenue  
Cleveland, Ohio 44115  
(216) 621-7227  
(216) 621-3999 – Fax  
[feudo@nicola.com](mailto:feudo@nicola.com)  
[cicero@nicola.com](mailto:cicero@nicola.com)

*Attorneys for Respondents  
the City of South Euclid and Lee Williams*

**CERTIFICATE OF SERVICE**

A copy of the foregoing *Respondents' City of South Euclid and Lee Williams Affidavit of Lee Williams* has been sent via email to Emilie DiFranco, Pro se Relator, 3867 W. 226<sup>th</sup> Street, Fairview park, Ohio 44126 at [emdifranco@sbcglobal.net](mailto:emdifranco@sbcglobal.net), on this 7<sup>th</sup> day of December 2015.

  
\_\_\_\_\_  
One of the Attorneys for Respondents

IN THE SUPREME COURT OF OHIO

State ex rel.	:	Case No. 14-0831
Emilie DiFranco	:	
	:	
Relator,	:	<b><u>Affidavit</u></b>
	:	
v.	:	
	:	
City of South Euclid, et al.	:	
	:	
Respondents	:	
	:	

STATE OF OHIO            )  
                                   ) ss.  
 COUNTY OF CUYHOGA    )

Now comes Lee Williams, one of the Respondents in the above-captioned matter and the affiant herein, and after being duly sworn according to law, deposes and states as follows:

1. This affidavit is based upon my personal knowledge, and I am competent to testify to the matters contained herein.

2. At all times relevant hereto, I have been and continue to be the Executive Assistant to the Mayor and Law Director and Purchasing Agent for Respondent the City of South Euclid, Ohio.

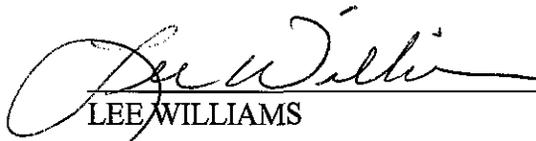
3. Upon receipt of this Honorable Court’s decision issued on December 2, 2015, I caused a search to be made of all City records to ascertain whether any City Department had documentation that was responsive to Relator’s requests for RC-03 forms for 2004 and 2005 and documentation pertaining to the cost of sidewalk snow removal of the 9 Greenvale Drive City-owned properties.

4. As a result of the search of City records, there are no responsive RC-03 records for 2004 and 2005 for any City Department, and no responsive documentation pertaining to the

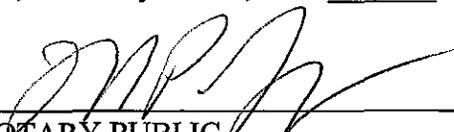
cost of sidewalk snow removal of the 9 Greenvale Drive City-owned properties.

5. After reviewing Relator's public records request dated September 4, 2013, the City has previously forwarded Relator all responsive records that existed.

FURTHER AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
LEE WILLIAMS

SWORN TO AND SUBSCRIBED, before me, a Notary Public, this 7<sup>th</sup> day of December, 2014.

  
\_\_\_\_\_  
NOTARY PUBLIC  
MY COMMISSION HAS  
NO EXPIRATION DATE.