

IN THE SUPREME COURT OF OHIO

Disciplinary Counsel, :
 :
Relator, :
 :
vs. : **CASE NO. 2015-2000**
 :
 :
Roger Stephen Kramer :
 :
Respondent. :

**RELATOR'S MOTION FOR A 10-DAY EXTENSION OF TIME TO FILE
RELATOR'S OBJECTIONS TO BOARD REPORT**

In accordance with S. Ct. Prac. R. 3.03(B)(2)(b)(i), relator, Disciplinary Counsel, respectfully requests a 10-day extension of time within which to file Relator's Objections to the Board of Professional Conduct's Findings of Fact, Conclusions of Law and Recommendation ("Board Report") in *Disciplinary Counsel v. Kramer*, Case No. 2015-2000.

The Supreme Court's Order to Show Cause was filed on December 18, 2015. The objections of one or both parties to the Board's Report in this proceeding are due for filing no later than Thursday, January 7, 2016. This request for an extension of time is being filed within the time permitted by the above-referenced rule. The following Memorandum in Support establishes that good cause exists for granting relator's request.

MEMORANDUM IN SUPPORT

The Court's Order to Show Cause in the above-referenced matter was filed on Friday, December 18, 2015. Relator learned of the Court's issuance of the OSC on Monday, December 21, 2015. However, because of family visiting from out-of-state for the Christmas holiday,

relator was out of the office from Thursday, December 24, 2015 through Sunday, December 27, 2015. Thereafter, in accordance with long-established travel plans, relator flew to California on Wednesday, December 30, 2015 in order to attend a wedding that was conducted in San Francisco on New Year's Eve. Relator returned to the office on Monday, January 4, 2016.

During the eight days that relator has been in the office since his receipt of the Order to Show Cause in this proceeding, relator has prepared and filed a Complaint that was certified by the Board of Professional Conduct on December 23, 2015 in *Disciplinary Counsel v. Arthur Ames*, Board Case No. 15-079 and participated in the preparation, review, editing and filing of two additional Complaints that were certified by the Board on December 30, 2015 in *Disciplinary Counsel v. William Truax*, Board Case No. 2015-080 and *Disciplinary Counsel v. Dennis McGrath*, Board Case No. 2015-081.

Moreover, in the exercise of relator's executive and managerial responsibility for the operation of the Office of Disciplinary Counsel, relator has expended much of the rest of his available time in the office in the review, editing and approval of letters of inquiry, dismissal letters, pleadings and other documents and correspondence being transmitted by the Office of Disciplinary Counsel.

As a result of the foregoing, however, Relator has been unable to complete the preparation and filing of Relator's Objections to the Board's Report within 20 days of the Court's filing of the Order to Show Cause in this proceeding.

Relator therefore contacted respondent's counsel and asked whether she and respondent would be willing to stipulate to a 20-day extension for the filing of Relator's Objections to the Board's Report. After consultation with her client, respondent's counsel advised relator that respondent declined to stipulate to any extension of time in this matter, thereby necessitating the

filing of this Request for a 10-Day Extension of Time to File Relator's Objections to Board Report.

In light of the foregoing, relator respectfully requests that this Court grant relator's request for a 10-day extension of time under S. Ct. Prac. R. 3.03(B)(2)(b)(i) to Monday, January 18, 2016 within which to file its Objections to Board Report in this matter. Relator's request is not intended to delay these proceedings.

Respectfully submitted,



Scott J. Drexel (0091467)
Disciplinary Counsel
250 Civic Center Drive, Suite 325
Columbus, Ohio 43215-7411
(614) 461-0256
(614) 461-7205 – fax
scott.drexel@sc.ohio.gov

CERTIFICATE OF SERVICE

A copy of Relator's Motion for a 10-Day Extension of Time to File Relator's Objections to Board Report has been served upon counsel for respondent by first-class U.S. Mail, postage prepaid, addressed to her at the following address:

Mary L. Cibella, Esq.
614 W. Superior Avenue, Suite 1300
Cleveland, Ohio 44113

this 6th day of January, 2016.



Scott J. Drexel
Counsel of Record