

IN THE SUPREME COURT OF OHIO

DISCIPLINARY COUNSEL,

CASE NO. 2014-1905

Relator,

v.

ANGELA ROCHELLE STOKES,

Respondent.

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RELATOR'S RESPONSE TO RESPONDENT'S MOTION FOR  
DISSOLUTION OF INTERIM REMEDIAL SUSPENSION

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SCOTT J. DREXEL

(0091467)

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IN THE SUPREME COURT OF OHIO

DISCIPLINARY COUNSEL, : CASE NO. 2014-1905  
: Relator, :  
: v. :  
ANGELA ROCHELLE STOKES, :  
: Respondent. :

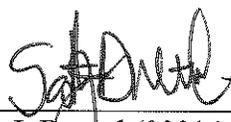
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RELATOR'S RESPONSE TO RESPONDENT'S MOTION FOR  
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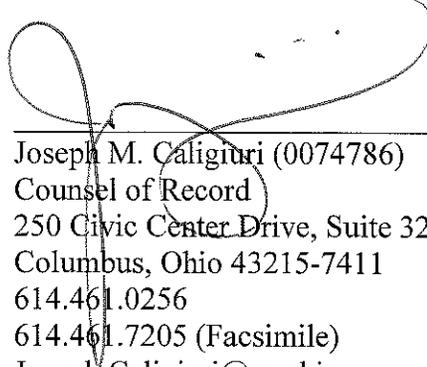
In response to respondent's Motion for Dissolution of Interim Remedial Suspension ("Motion") under Gov. Bar R. V(19)(C)(1), relator advises this Court that, based upon respondent's irrevocable retirement from the Cleveland Municipal Court, her sworn statement that she will never run for, seek appointment to, or hold any judicial position in any Ohio state court, and the dismissal of the Amended Complaint, it has no objection to respondent's motion.<sup>1</sup>

Respectfully submitted,

  
\_\_\_\_\_  
Scott J. Drexel (0091467)  
Disciplinary Counsel

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<sup>1</sup> Should this Court grant respondent's motion, relator anticipates that respondent will apply for reinstatement to the practice of law as required under this Court's December 18, 2014 Interim Remedial Suspension Order ("Order") and Gov. Bar R. V(24). Given that the Amended Complaint was dismissed in return for respondent's immediate and irrevocable retirement from the Cleveland Municipal Court and her sworn statement that she will never run for, seek appointment to, or hold any judicial position in any Ohio state court, relator requests that if respondent satisfies the conditions for reinstatement under Gov. Bar R. V(24), that her reinstatement be conditioned upon her continued compliance with paragraph seven of her affidavit, attached hereto as "Appendix A."

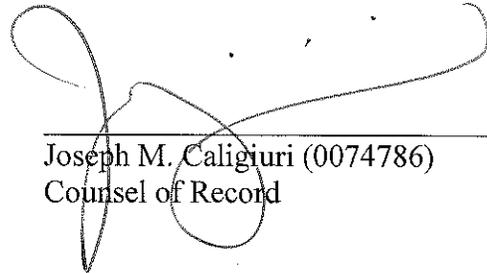


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**CERTIFICATE OF SERVICE**

A copy of the foregoing Relator's Response to Respondent's Motion for Dissolution of Interim Remedial Suspension has been served upon respondent's Counsel, Richard C. Alkire ([rick@alkirelawyer.com](mailto:rick@alkirelawyer.com)), Larry Zukerman, Esq. ([l wz@zukerman-law.com](mailto:l wz@zukerman-law.com)), Paul B. Daiker, Esq. ([pbd@zukerman-law.com](mailto:pbd@zukerman-law.com)), and Adam Brown, Esq. ([amb@zukerman-law.com](mailto:amb@zukerman-law.com)), via electronic mail, and to Richard Dove, Secretary, Board of Professional Conduct, via electronic mail, ([bocfilings@sc.ohio.gov](mailto:bocfilings@sc.ohio.gov)) this 17th day of February, 2016.



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Joseph M. Caligiuri (0074786)  
Counsel of Record

STATE OF OHIO            )  
                                  )  
                                  ) SS:  
                                  )  
CUYAHOGA COUNTY        )

**AFFIDAVIT OF ANGELA ROCHELLE STOKES**

Angela Rochelle Stokes, after having first been sworn according to the laws of Ohio, attests that:

1. I am at least 18 years of age and I have personal knowledge of the matters set forth in this affidavit.
2. I was admitted to the practice of law in the state of Ohio on October 29, 1984.
3. I was elected as a judge of the Cleveland Municipal Court in November 1995 to fill an unexpired term and was respectively re-elected to serve full six-year terms in 1999, 2005, and 2011.
4. On October 14, 2013, the Board of Commissioners on Grievances and Discipline certified a formal complaint against me, Case No. 13-057. That complaint was amended on April 29, 2014 resulting in the First Amended Complaint under Case No. 13-057.
5. On November 4, 2015, the Office of Disciplinary Counsel (ODC) filed a Motion for Immediate Interim Remedial Suspension, which the Supreme Court granted on December 18, 2014, Case No. 2014-1905.
6. I have been under the Interim Remedial Suspension since December 18, 2014.
7. In return for ODC filing a Motion to Dismiss the First Amended Complaint (Case No. 13-057) in its entirety, I agree—effective upon the Panel’s and/or Board’s order dismissing the First Amended Complaint—to:
  - Immediately, voluntarily, and irrevocably retire from the Cleveland Municipal Court; and,
  - Never run for, seek, accept appointment to, or hold any judicial position in any Ohio state court, excluding federal court positions.
8. With regard to the grounds to be asserted by ODC in support of its Motion to Dismiss the First Amended Complaint (Case No. 13-057), ODC has informed me

**Appendix A**

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Initials

that the grounds for its Motion will be limited to the agreement set forth in paragraph 7 above.

9. I understand that the Panel and/or Board may conduct a hearing on the Motion to Dismiss and that this agreement is conditioned upon the Panel's and/or Board's dismissal of the First Amended Complaint, Case No. 13-057.
10. With regard to the Interim Remedial Suspension, ODC has informed me that it intends to file a response to Respondent's Motion to Dissolve the Interim Remedial Suspension with the Supreme Court of Ohio notifying it of the conditions upon which the First Amended Complaint was dismissed as stated in paragraph 7 above. Relator will not oppose Respondent's Motion if the conditions have been met.
11. Upon reinstatement to the practice of law in Ohio, I understand that I must comply with the Supreme Court Rules for the Government of the Bar, the Ohio Rules of Professional Conduct, and any additional orders issued by the Court.
12. I am entering into this agreement freely and voluntarily and after having had sufficient time to discuss this matter with my lawyers.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
Angela Rochelle Stokes (0025650)

**SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS**

21st DAY OF DECEMBER 2015.

  
\_\_\_\_\_  
Notary Public

My commission expires \_\_\_\_\_



**VIDA VEST**  
**NOTARY PUBLIC**  
**STATE OF OHIO**  
Recorded in  
Cuyahoga County  
My Comm. Exp. 11/15/2019