

**IN THE SUPREME COURT OF OHIO**

In re: (C.C.S.), (C.L.S.) :  
 :  
 : Case No. 2016-0395  
 :  
 Petitioner-Appellant, :  
 :  
 : On Appeal from the  
 v. :  
 : Franklin County Court  
 : of Appeals, Tenth  
 : Appellate District  
 :  
 ADOPTION BY GENTLE CARE :  
 :  
 :  
 Respondent-Appellee. : Court of Appeals  
 : Case No. 15-AP-884  
 :  
 :  
 : **ADOPTION INVOLVED**

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APPELLANT'S REPLY TO MOTION FOR EXTENSION

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COUNSELS FOR APPELLEE, ADOPTION BY GENTLE CARE

Under S.Ct.Prac.R. 3.03(B)(2)(b)(i) an extension of time for the Appellee to file its merit brief is only available “provided the request for extension of time states good cause for an extension”. This is an expedited case because the custody and future of a child is at stake. So we must look to see if an extension of time is warranted.

The web site of Tucker Ellis LLP states:

In addition to these features which we believe make us somewhat unique, we are also a full-service law firm with 200 lawyers practicing nationwide out of offices in Chicago, Cleveland, Columbus, Denver, Houston, Los Angeles, and San Francisco. We have a national reputation for our trial work – particularly in the areas of Pharmaceutical, Mass Tort, Product Liability, Class Action, and other Commercial Litigation. We have sophisticated nationwide Intellectual Property and Insurance capabilities, and top notch Antitrust, Public Finance, Commercial Lending, Estates and Probate, Real Estate, Mergers and Acquisitions, Securities, Tax and General Corporate practices.

Clearly the counsel for the Appellee is equipped to write a merit brief. In addition there are two attorneys representing the Appellee and the second attorney, A. Patrick Hamilton, has not provided any assertion that he is not available to comply with the briefing schedule. All we have is a statement that some unknown source may consider filing an amicus brief and some unknown case may require the attention of counsel for the Appellee. The question is whether or not these two vague representations warrant an extension at the eleventh hour. I believe the answer must be no.

Respectfully submitted,

s/ Steven E. Hillman

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**CERTIFICATE OF SERVICE**

I certify that a true copy of this Reply Motion was sent by separate email and United States mail to the following counsel on June 23, 2016:

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