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**RELATOR’S EMERGENCY MOTION TO RECONSIDER THE COURT’S
GRANT OF PEREMPTORY WRIT OF PROHIBITION AND GRANT OF RELATOR’S
MOTION FOR EMERGENCY RELIEF**

The Motion for Reconsideration filed by Intervenor Stanley M. Chesley (“Chesley”) and Waite Schneider Bayless & Chesley Co., LPA (“WSBC”) (collectively, “Intervenors”) is nothing more than an attempt to reargue their cases in the hopes that this Court will change its position. The Supreme Court uses its authority under Rule 18.02 in limited circumstances to “correct decisions which, upon reflection, are deemed to have been made in error.” *State ex rel. Huebner v. W. Jefferson Village Council*, 75 Ohio St.3d 381, 383, 662 N.E.2d 339 (1995). A motion to reconsider is not properly taken, however, when the moving party simply seeks to reargue its case. *See Dublin City Sch. Bd. of Educ. v. Franklin County Bd. of Revision*, 139 Ohio St.3d 212, 214, 2014-Ohio-1940, 11 N.E.3d 222, ¶ 9. This court has already thoroughly considered the merits of this case, and it has already issued a detailed opinion on the issues involving the parties. The Intervenors’ arguments do not call attention to obvious error or an issue not already considered by this Court. The Motion should be denied.

First, as this Court thoroughly discussed in its Opinion, Judge Ruehlman does not have jurisdiction over any of WSBC’s claims. *The State ex rel. Ford v. Ruehlman*, Slip Op. No. 2016-Ohio-3529, at ¶¶ 71-80. This Court carefully considered the relief requested by WSBC, claim by claim, and concluded that Judge Ruehlman lacked jurisdiction over each—including the relief requested purportedly outside of the Ohio Uniform Enforcement of Foreign Judgment Act (“UEFJA”). So, contrary to WSBC’s assertions, this Court has already considered whether Judge Ruehlman had jurisdiction over its non-UEFJA claims—and concluded he did not.

Second, as this Court recognized, Chesley’s complaint sought relief under the UEFJA. Therefore, in determining whether Judge Ruehlman had jurisdiction over Chesley’s claims, the

Court had to consider the scope of the UEFJA, including the statutory requirements for domesticating a foreign judgment. The fact that Chesley's alleged defenses are invalid under the statute does not negate this Court's proper interpretation of the statute. Moreover, to suggest that the Ohio Supreme Court cannot interpret Ohio statutes is untenable.

Finally, clarification of the Court's order granting the stay pertaining to case A1602508 is not required. Per the Court's order, the case has been stayed.

Accordingly, Intervenors provide this Court with no basis on which to reconsider its decision. They identify no obvious error, nor do they raise an issue not already considered by this Court's opinion. The fact that Intervenors disagree with this Court's decision is simply not a basis to grant the reconsideration motion.

Respectfully submitted,

s/ Brian S. Sullivan

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on the following individuals via U.S. regular mail on this 11th day of July, 2016:

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