

**STATE OF OHIO  
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY  
CIVIL DIVISION**

**BRYAN ANTHONY REO,**

Plaintiff,

v.

**MARTIN LINDSTEDT,**

Defendant.

Case No. 15CV001590

Case No. 16CV000825

Hon. Patrick J. Condon

**REO LAW LLC**

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

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*Pro Se Plaintiff & Attorney*

**MARTIN LINDSTEDT**

338 Rabbit Track Road

Granby, MO 64844

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*Pro se Defendant*

**BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER  
FOR DEFENDANT TO SHOW CAUSE**

Plaintiff prevailed at a jury trial conducted in the consolidated case, verdict rendered June 26, 2019 and judgment duly entered upon that verdict in the amount of \$105,400 to date.

Plaintiff is entitled to broad post-judgment discovery to aid in executing upon the judgment.

Ohio Civ. R. 69 provides that Plaintiff, as a judgment creditor, may obtain discovery upon Defendant as the judgment debtor to aid in execution on the judgment.

On September 6, 2019 Plaintiff served post judgment discovery upon Defendant in text modifiable format served in an electronic manner. On October 4, 2019 Defendant provided non-responsive responses wherein he essentially told Plaintiff "I don't feel like answering these questions." On October 4, 2019 Plaintiff emailed Defendant to explain that Defendant's answers were woefully deficient and non-responsive and to inquire as to when Defendant would be available to discuss the situation by phone. Defendant did not respond to the email but he posted a copy on his website [acknowledging he received it]-along with mocking commentary.

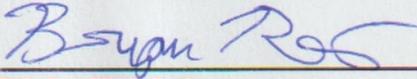
On October 16, 2019, Plaintiff filed a motion to compel post judgment discovery, Defendant filed a rambling opposition and blogged about the motion.

On November 19, 2019, this Court granted in part, and denied in part, Plaintiff's motion to compel post-judgment discovery.

Since the order granting part of the motion, Defendant has ignored all attempts by Plaintiff to inquire as to the questions the Court ordered answered. Defendant has not provided any answers, and Defendant will not agree to any sort of time or place where he will appear to provide the answers. Defendant has persistently refused to cooperate even in the face of the order issued by this Court on November 19, 2019.

Defendant should be made to appear, in person, to show cause, as to why he should not be held in contempt for his flagrant and blatant violations of the order entered by this Court on November 19, 2019.

RESPECTFULLY SUBMITTED,

X 

**REO LAW LLC**

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*Attorney and Pro Se Plaintiff*

## Certificate of Service

I, Bryan Reo, do hereby certify that a true and genuine copy of the foregoing has been dispatched by United States **USPS First Class Mail** to the Defendant at:

Martin Lindstedt  
338 Rabbit Track Road  
Granby, Missouri 64844

On this 19 day of December, 2019

X Bryan Reo

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