

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

FILED
2019 JUL 10 PM 12:29
MAUREEN G. KELLY
LAKE CO. CLERK OF COURT

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

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Pro Se Plaintiff & Attorney

MARTIN LINDSTEDT

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Pro se Defendant

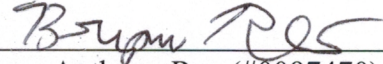
PLAINTIFF'S MOTION FOR PRE-JUDGMENT INTEREST

Plaintiff Pro Se, hereby makes this motion for pre-judgment pursuant to Ohio Civ.R. 59(B) interest on the basis that Defendant injured Plaintiff beginning on 9/18/2014 and that Plaintiff is entitled to pre-judgment interest from that date to the date of the judgment. If not calculated from the date of the injury then Plaintiff would in the alternative be entitled to pre-judgment interest from the date of the filing of the 15CV complaint that initiated the action, 9/18/2015.

Plaintiff therefore moves this Honorable Court to enter an order modifying the judgment entered on 7/1/2019 to include pre-judgment interest at the statutory rates provided for the period in question. The amount of pre-judgment interest in question is \$18,521.24 dollars.

A brief and proposed order accompany this motion.

Respectfully submitted

A handwritten signature in black ink that reads "Bryan Reo". The signature is written in a cursive style and is positioned above a horizontal line.

Bryan Anthony Reo (#0097470)

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BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR PRE-JUDGMENT INTEREST

Defendant injured Plaintiff beginning on 9/18/2014, injuries which consisted of intentional torts [see docket entry 7/1/2019- judgment for Plaintiff on intentional tort claims of defamation per se and false light]. The case 15CV001590 was filed on 9/18/2015.

Judgment was rendered in favor of Plaintiff in the amount of \$105,000 dollars against Defendant Martin Lindstedt.

Plaintiff is entitled to pre-judgment interest from the date of the injury, 9/18/2014, to the date the judgment was rendered 7/1/2019.

The statutory rates for the relevant periods were/are as follows.

2014 = 3%

2015 = 3%

2016 = 3%

2017 = 4%

2018 = 4%

2019 = 5%

At the rates provided via the statutory calculation via the tax commissioner, Plaintiff would therefore be entitled to the following amounts in pre-judgment interest.

2014 = \$918.75 [on the basis of 3.5 months at 3%]

2015 = \$3,150.00 [on the basis of 12 months at 3%]

2016 = \$3,150.00 [on the basis of 12 months at 3%]

2017 = \$4,120.00 [on the basis of 12 months at 4%]

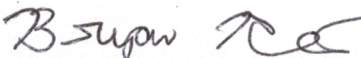
2018 = \$4,120.00 [on the basis of 12 months at 4%]

2019 = \$3,062.49 [on the basis of 7 months at 5%]

Pre-judgment interest in the aggregate from the applicable period amounts to \$18,521.24 dollars due and owed by Defendant to Plaintiff.

This Court should therefore enter an order granting Plaintiff pre-judgment interest in the amount of \$18,521.24 dollars against Defendant Martin Lindstedt.

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 regular mail, postage prepaid to the Defendants at:

Martin Lindstedt
338 Rabbit Track Road
Granby, Missouri 64844

Roxie Fausnaught
338 Rabbit Track Road
Granby, Missouri 64844

Church of Jesus Christ Christian/Aryan Nations of Missouri
338 Rabbit Track Road
Granby, Missouri 64844

On this 10 day of July, 2019

X Bryan Reo

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MARTIN LINDSTEDT

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Pro se Defendant

**ORDER GRANTING MOTION
FOR PRE-JUDGMENT INTEREST**

THIS MATTER came to be considered by the Court pursuant to the Plaintiff's Motion for Pre-Judgment Interest filed by Plaintiff in the above-captioned cause. The Court having considered the Motion and being fully advised of the premises, it is, therefore,

ORDERED and ADJUDGED:

1. That the Plaintiff's Motion for Pre-Judgment Interest is hereby granted.
2. The Judgment entered on 7/1/2019 is hereby amended to include pre-judgment interest in the amount of _____.

DONE AND ORDERED in Chambers at Painesville, Lake County, Ohio this ____ day of _____, 2019.

PATRICK J. CONDON, JUDGE LAKE COUNTY COMMON PLEAS

Copies to:

Bryan Anthony Reo

Martin Lindstedt

Roxie Fausnaught

Church of Jesus Christ Christian Aryan Nations of Missouri