

FILED

2019 SEP -9 PM 2:59

MAUREEN G. KELLY
LAKE COUNTY CLERK OF COURT

STATE OF OHIO

IN THE COURT OF COMMON PLEAS OF LAKE COUNTY

CIVIL DIVISION

BRYAN ANTHONY REO,

Plaintiff,

v

MARTIN LINDSTEDT, ET AL.,

Defendants.

Case Nos. ~~15CV001590~~ and 16CV000825

Hon. Patrick J. Condon

REO LAW LLC

Bryan Anthony Reo (#0097470)

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Mentor, OH 44061

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Pro se Plaintiff

MARTIN LINDSTEDT

338 Rabbit Track Rd.

Granby, MO 64844

(T): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

**PLAINTIFF'S BRIEF IN OPPOSITION TO DEFENDANT'S
MOTION FOR SANCTIONS**

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiff's Brief in Opposition to Defendant's Motion for Sanctions.

For the reasons that follow Defendant's post-judgment motion for sanctions is not only wholly lacking in merit but is frivolous, vexatious, abusive, and worthy of sanctions being assessed against Defendant for wasting this Court's time and this Plaintiff's time.

Defendant's post-judgment motions should all be denied in their entirety.

I. TRIAL OUTCOME

Plaintiff prevailed against Defendant as the result of a favorable verdict returned by the jury at the conclusion of the jury trial which began on June 24, 2019, and ended on June 26, 2019.

II. DEFENDANT SEEKS SANCTIONS FOR BASELESS REASONS

Kyle James Bristow is a licensed Ohio attorney, Brett Klimkowsky is a licensed Ohio attorney, Bryan Anthony Reo is a licensed Ohio attorney. All three are in good standing with the state supreme court. Kyle James Bristow in his capacity as an Ohio attorney provided Bryan Anthony Reo a template document motion for sanctions that Bristow had prepared for filing in other cases of Bristow's. Attorney Reo, Plaintiff in the instant action, edited and filled the template accordingly and then signed it and filed it. None of that conduct is sanctionable. It is irrelevant who originally created the template document.

III. DEFENDANT IS NOT ENTITLED TO SANCTIONS

Defendant is not entitled sanctions for any number of reasons, not least of which being that Defendant is not an attorney and has never been represented by an attorney or incurred any attorney's fees in this matter. Furthermore, Defendant's time is not worth anything because by his own admission he has not worked in 30 years. Defendant is a man approximately 63 years of age who has not worked since he was 33, in short Defendant is a chronic bum who sits around all day and defames people via the internet; his time is worth precisely zero dollars.

IV. STATUTE OF LIMITATIONS ARGUMENTS

Adherence to the Rules of Civil Procedure is not the only area where Defendant appears to have trouble. Defendant seems unable to process basic arithmetic or to follow a calendar. This Court restricted Plaintiff to advancing claims for libelous remarks that occurred within 12 months prior to the filing of the 15CV case, or that occurred 12 months prior to the filing of the 16CV case and was thus current and actionable. It was noted on the record that Defendant's objections and claims, "he is showing stuff from 2010 and 2011" was baseless, as the Court noted, "no he isn't, he has restricted himself to the timeframe this Court has provided."

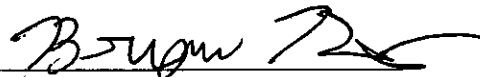
**V. DEFENDANT VOLUNTARILY ASSENTED TO THE JURISDICTION OF THIS
COURT BY PLEADING A COUNTER-CLAIM AND PROCEEDING TO LITIGATE
HIS COUNTER-CLAIM**

Defendant continues to incessantly complain about personal jurisdiction while advancing the interesting, yet meritless, theory that this Court lacks jurisdiction to hear claims against Defendant but does have jurisdiction to listen to Defendant's claims against others. In short, Defendant appears to want this Court to adopt a position that Lake County Court of Common Pleas has jurisdiction to hear Mr. Lindstedt's counter-claims against Lake County residents, but does not have jurisdiction to hear claims against Mr. Lindstedt. Defendant Lindstedt voluntarily assented to the personal jurisdiction of this Court when he filed his first responsive pleading which was an Answer containing a Counter-Claim. He waived any arguments about personal jurisdiction at that time.

Accordingly, this Court should deny all of Defendant Lindstedt's post-judgment motions, in their entirety. Furthermore, Defendant Lindstedt should be sanctioned an amount this Court determines just and appropriate to deter him from continuing his endless barrage of frivolous post-judgment motions. This Court should require Defendant Lindstedt to post a contempt bond in an amount deemed appropriate and proper to deter Defendant from continuing his endless barrage of nonsensical motions.

Respectfully submitted,

REO LAW, LLC



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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 Postal Service, regular first class mail to the Defendants at:

Martin Lindstedt
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 9 day of September 2019

X

Bryan Reo
