

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**ANTHONY DOMENIC REO,**

Plaintiff,

v.

**MARTIN LINDSTEDT.,**

Defendant.

Case No. 1:19-cv-02615-JRA

Hon. John R. Adams

Mag. Carmen Henderson

**REO LAW, LLC**

Bryan Anthony Reo (#0097470)

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*Attorney for Anthony Domenic Reo*

**MARTIN LINDSTEDT**

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*Pro se Defendant*

**PLAINTIFF ANTHONY DOMENIC REO'S BRIEF IN OPPOSITION TO  
DEFENDANT'S MOTION FOR RECONSIDERATION**

NOW COMES Anthony Domenic Reo ("Plaintiff"), *by and through the undersigned counsel*, and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiff Anthony Domenic Reo's Brief in Opposition to Defendant's Motion for Reconsideration. (ECF No. 32)

Defendant seeks leave to amend his pleadings. (ECF No. 32)

Defendant seeks this leave despite the fact that this case is more than 500 days old. Indeed this case is more than 500 days old and as such it would be highly prejudicial to Plaintiff to allow

Defendant leave to amend his pleadings in any fashion. Furthermore, Defendant never propounded, responded to, nor in any way participated in discovery. This is not a matter of a party who fully participated in discovery and came to realize he may have had additional claims/counter-claims or defenses. Finally, the proposed amendment is plainly lacking in merit and thus amendment would be futile. This is an instance of a bad faith litigant seeking to cause delay by joining a dozen or more uninvolved and unnecessary third parties via third party complaint practice based on irrelevant and frivolous claims. Defendant should not be given leave to engage in joinder, amendment, or in any way be allowed any sort of leave to amend his pleadings to add claims or defenses.

This Court should finally put an end to Defendant's paperwork tsunami approach to litigation and enter summary judgment in favor of Plaintiff, in the amount of \$500,000.00 dollars, against Defendant, and dispose of this case in its entirety.

This case began on 9/18/2019 in Lake County Court of Common Pleas.

Defendant filed what he purported to be an answer with a counter-claim on 11/14/2019. (ECF No. 4)

Significant portions of that document were ultimately stricken. (ECF No. 30)

The Court issued a scheduling order assigning the case to standard track on 4/29/2020. The court provided a deadline for dispositive motions of 9/14/2020. (ECF No. 17)

Plaintiff Anthony Domenic Reo filed a Motion for Summary Judgment on 6/12/2020. (ECF No. 18).

Defendant opposed Plaintiff's motion. (ECF No. 19)

Plaintiff timely filed a Reply Brief in Support of Summary Judgment on 7/14/2020 (ECF No. 20)

This case is now more than 500 days old, has been pending for more than 16 months, the scheduling order issued by this Court ended at the deadline for summary judgment and did not schedule anything beyond 9/14/2020, and the motion for summary judgment has been fully briefed and ripe as of 7/14/2020.

Defendant never cooperated with discovery, never participated in discovery, never provided any responses to any of Plaintiff's discovery, never engaged in any sort of good faith behavior to further these proceedings, and has never made any motions pursuant to Fed Civ. R. 36 and simply does not deserve the consideration of being allowed to withdraw any admissions, a withdrawal that would be highly prejudicial to Plaintiff given Defendant's complete non-participation and non-cooperation with the case. Defendant never found the time or the inclination to participate in discovery in any manner but Defendant has found the time to flagrantly disobey the orders of this Court by continuing to use racial slurs and abusive language in his filings and he

has found the time to seek leave to amend his pleadings to attempt to bog down the instant action with a dozen irrelevant third parties and frivolous claims.

Defendant is abusing civil process to cause delay for the purposes of hindering the rights of a likely future judgment creditor. Defendant is doing everything in his power to bog down the proceedings in the instant action. Defendant attempted to bog down the proceedings in 1:19-cv-02589-CAB (Magistrate's Report & Recommendation recommend DENYING Defendant's motion for leave to amend pleadings, ECF No. 52) and in 1:19-cv-02103-SO (Proposed Joinder/leave to amend stricken and denied, ECF No. 35). Defendant appears unable, or perhaps rather, unwilling, to conform his filings to the Federal Rules of Civil Procedure and to adhere to basic principles of civility and decency when submitting a filing to this Court. Defendant should not be given free reign to conduct himself in this manner for multiple more months, nor should he be allowed to trigger delays and receive an unjust reward via the delays he seems to seek.

This case is ripe to be disposed of, in its entirety, by the granting of Plaintiff's pending motion for summary judgment. (ECF No. 18)

Plaintiff prays that this Court will grant, in full, the pending motion for summary judgment, enter judgment for Plaintiff as to liability and damages, and resolve this matter completely and permanently and put this dispute to rest. Defendant should be denied the reconsideration on amending his pleadings, adding additional parties, adding claims, adding defenses, and denied any of the relief he requested in his motion for reconsideration.

Respectfully submitted,

**REO LAW, LLC**

/s/ Bryan Anthony Reo  
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*Pro se Plaintiff*

Dated: February 1, 2021

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*Pro se Defendant*

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**CERTIFICATE OF SERVICE**

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I, Bryan Anthony Reo, affirm that I am a counsel for Plaintiff in the above-captioned civil action, and on February 1, 2021, I served a true and accurate copy the foregoing document upon Martin Lindstedt, 338 Rabbit Track Road, Granby, MO 64844, by placing the same in a First Class postage-prepaid, properly addressed, and sealed envelope and in the United States Mail located in City of Mentor, Lake County, State of Ohio.

/s/ Bryan Anthony Reo

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*Attorney for Plaintiff Anthony Domenic Reo*

Dated: February 1, 2021