

**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 E. 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

DECLARATION OF COUNSEL OF ATTORNEY
BRYAN ANTHONY REO ON BEHALF OF
PLAINTIFF ANTHONY DOMENIC REO IN
SUPPORT OF PLAINTIFF'S PARTIAL OBJECTIONS
TO MAGISTRATE'S REPORT AND RECOMMENDATION

The following is a Declaration of Counsel of Attorney Bryan Anthony Reo, counsel of record for Plaintiff Anthony Domenic Reo.

1. My name is Bryan Anthony Reo. I am an attorney duly admitted to practice in both the State of Ohio and the State of Michigan. I am over 18 years of age. I am competent to testify and would do so if called upon. I make this declaration on personal knowledge and in my capacity as lead trial counsel for Plaintiff Anthony Domenic Reo, under penalty of perjury.

2. I initiated the instant action in Lake County Court of Common Pleas in Lake County Ohio on behalf of my client, whereafter Defendant removed the case to the United States District Court for the Northern District of Ohio.

3. I served Defendant Martin Lindstedt a discovery packet containing Interrogatories, Requests for Production of Documents, and Requests for Admissions by United States Postal Service First Class Mail to 338 Rabbit Track Road, Granby Missouri, 64844 and electronic email service to the email address pastorlindstedt@gmail.com, the physical mailing address and email address associated with Defendant and being used by Defendant throughout these proceedings.

4. There was no indication that Defendant did not receive the discovery. The mailing was not returned for any reason and the email did not result in a failure return.

5. Defendant actually posted offensive commentary on his website about receiving discovery from Plaintiff and has made filings with this Court wherein he references the receipt of discovery from Plaintiff.

6. At no time did Defendant ever provide any actual responses to Plaintiff's discovery. Defendant never answered a single interrogatory, never produced or even identified a single document, and never responded to RFAs.

7. Defendant has been warned in this and other cases about the consequences of not participating in discovery including not responding to RFAs. In this case Defendant was explicitly told by the Court that he was obligated to coordinate a Ruel 26(f) conference for discovery purposes and that he faced a default if he would not cooperate with the conference and failed to attend a physical in-person status conference that would take place in lieu of the Rule 26(f).

8. The following is a list of cases of which I was either a pro se plaintiff or counsel to a party wherein Defendant has been aware of the consequences of Civil Rule 36 and has been aware of his obligations under the rules that govern discovery and has elected to not participate or not cooperate with discovery.

A- *Bryan Anthony Reo v. Martin Lindstedt*, 14-5093-CV-SW-MJW (WD of Missouri, Southwestern Division) Involved Requests For Admissions including #34, “Admit that you have damaged the Plaintiff to the extent of the damages alleged in the original Complaint.” Lindstedt did not participate in discovery, did not respond to Interrogatories, did not respond to Requests for Production of Documents, and did not respond to RFAs, technically if one counts his insulting rant wherein he admitted to receiving Bryan Anthony Reo’s discovery packet but stated he would not participate in answering questions for somebody whose race, sexuality, and ancestry he despises, he did “respond” to acknowledge and admit he had received the discovery packet, but he did not substantively respond to the content of the packet.

B- *Bryan Anthony Reo v. Martin Lindstedt*, 15CV1590 and 16CV825 (consolidated for trial) (Lake County Court of Common Pleas) Involved Requests For Admissions including # 48, “Admit to all allegations, whether factual or legal, in Plaintiff’s complaint.” #49, “Admit that Plaintiff is entitled to no less than all of the relief pleaded for in Plaintiff’s complaint.” Lindstedt did not participate in discovery, did not respond to Interrogatories, did not respond to Requests for Production of Documents, and did not respond to RFAs, his reply to discovery consisted of an incoherent rant and the taking of plaintiff Reo’s questions and flipping them around so Lindstedt wound up asking those very same questions of Reo, noting that Reo actually did respond in writing to what Lindstedt served upon him.

C- *Bryan Anthony Reo v. Martin Lindstedt*, 1:19-cv-02103-SO (ND of Ohio) Involved Requests For Admissions including #36, “Please admit to the truth of all allegations, factual and legal, contained within Plaintiff’s Complaint.” #34, “Please admit that for the reasons set forth within Plaintiff’s Complaint, Plaintiff suffered \$250,000.00 in general damages

due to Defendant's tortious conduct." #35, "Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff it would be just and proper for Plaintiff to be awarded \$750,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct." Lindstedt never responded to discovery and never propounded any of his own, although he did acknowledge receipt of service of the discovery packet.

D- *Bryan Anthony Reo v. Martin Lindstedt*, 1:19-cv-02589-CAB (ND of Ohio) Involved Requests For Admissions including #32, "Please admit to the truth of all allegations, factual and legal, contained within Plaintiff's Complaint." #30, "Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff suffered \$250,000.00 in general damages due to Defendant's tortious conduct." #31, "Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff it would be just and proper for Plaintiff to be awarded \$500,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct." Lindstedt never responded to discovery and never propounded any of his own, although he did acknowledge receipt of service of the discovery packet

E- *Stefani Rossi Reo v. Martin Lindstedt*, 1:19-CV-02786-CAB (ND of Ohio) Involved Requests For Admissions including #25, "Please admit to the truth of all allegations, factual and legal, contained within Plaintiff's Complaint." #23, "Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff suffered \$250,000.00 in general damages due to Defendant's tortious conduct." #24, "Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff it would be just and proper for Plaintiff to be awarded \$250,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct." #28, "Please admit that you damaged Plaintiff in an amount of \$250,000 in general damages and \$250,000 in punitive damages." #29, "Please admit that judgment should be entered against you, in favor of Plaintiff Stefani Rossi Reo, in the amount of \$500,000.00 dollars." Lindstedt never responded to discovery and never propounded any of his own, although he did acknowledge receipt of service of the discovery packet.

9. The statements I have made about the proceedings in the above-referenced cases are true and accurate and reflect my recent review of the dockets, the case files, and my information, knowledge, and best recollection of the relevant proceedings from those cases.

10. Lindstedt has been plaintiff in the following civil actions filed within the United States District Court for the Western District of Missouri, wherein he was a plaintiff pro se.

- i. 2:96-cv-04262-DBB Lindstedt v. Missouri Libertarian, et al
- ii. 3:04-cv-05062-RED Lindstedt v. Blunt
- iii. 3:95-cv-05070-DW Lindstedt v. Mo S State College, et al
- iv. 3:96-cv-05057-DW Lindstedt v. Granby, City of, et al.
- v. 3:96-cv-05103-DBB Lindstedt v. Baum, et al
- vi. 3:97-mc-05064-DW Lindstedt v. Jasper County MO, et al
- vii. 3:97-mc-05074-ODS Lindstedt v. Hopper, et al

11. Additionally, Lindstedt was a defendant in the civil action Bryan Reo v. Martin Lindstedt 3:14-cv-05093-MJW in the United States District Court for the Western District of Missouri, wherein he was a defendant pro se.

12. Lindstedt has been an appellant in the following appeals filed within the United States Court of Appeals for the Eighth Circuit, wherein he was an appellant pro se.

- viii. 05-3173 Martin Lindstedt v. Matt Blunt, et al
- ix. 15-1931 Martin Lindstedt v. Terry Neff, et al
- x. 15-3756 Bryan Reo v. Martin Lindstedt
- xi. 16-1489 Martin Lindstedt v. Newton County, et al
- xii. 97-2892 Martin Lindstedt v. Kay Baum, et al
- xiii. 97-3351 Martin Lindstedt v. MO Libertarian, et al
- xiv. 97-3540 Martin Lindstedt v. Craig Hopper, et al

xv. 98-1896 Martin Lindstedt v. Jasper County, MO, et al

xvi. 98-2503 Martin Lindstedt v. MO Libertarian, et al

xvii. 98-3949 Martin Lindstedt v. Jasper Cty. MO, et al

xviii. 99-1032 Martin Lindstedt v. MO Southern State, et al

xix. 99-2624 Martin Lindstedt v. City of Granby, et al

13. The information regarding Martin Lindstedt's federal trial court cases in Missouri and 8th Circuit court cases is current, correct, and accurate, having been obtained from PACER on 3/9/2021.

14. I am not familiar with the specific substantive details of Martin Lindstedt's trial court cases or appeals in Missouri excepting the case(s) that specifically involved myself as a party.

15. It is my opinion that Defendant is a fairly sophisticated pro se litigant who understands his burdens and responsibilities per the rules of civil procedure and the rules of discovery and has simply elected to embark upon a course of causing maximum delay. I base this in part upon the fact that the 15CV 16CV consolidated Lake County case was initiated on 9/18/2015 and was finally tried on 6/24/2019 with over 200 entries on the docket and upon the statement "By moving it up to the federal level hopefully it will be delayed. In South Dakota Pastor Lindstedt gave his property back to his sister who uses lawyers to try to keep it." *Bryan Anthony Reo v. Martin Lindstedt*, Case No. 1:19-cv-02589-CAB [ECF No. 57, Page ID #541].

Sworn under the pains and penalty of perjury this 8th day of March, 2021.

/s/ Bryan Anthony Reo
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Attorney for Anthony Domenic Reo

Dated: March 9, 2021

CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on March 9, 2021, I served a true and accurate copy of Declaration of Counsel of Attorney Bryan Anthony Reo 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 Village of Mentor, Lake County, State of Ohio.

/s/ Bryan Anthony Reo
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Attorney for Anthony Domenic Reo

Dated: March 9, 2021