

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

STEFANI ROSSI REO,

Plaintiff / Counter-Defendant,

v.

MARTIN LINDSTEDT,

Defendant / Counter-Plaintiff.

Case No. 1:19-CV-02786-CAB

Hon. Christopher A. Boyko

Mag. Thomas M. Parker

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Pro se Defendant

**PLAINTIFF STEFANI ROSSI REO'S MOTION TO STRIKE DEFENDANT'S ANSWER
AND/OR FOR A MORE DEFINITE STATEMENT**

NOW COMES Stefani Rossi Reo ("Plaintiff"), *by and through undersigned Counsel* and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiff Stefani Rossi Reo's Motion to Strike Defendant's Answer and/or for a More Definite Statement:

1. For the reasons set forth in Plaintiff Stefani Rossi Reo's Brief in Support of Plaintiff's Motion to Strike Defendant's Answer and/or for a More Definite Statement, Defendant's Answer and Counter-Complaint (Doc. 6) should be stricken pursuant to Fed. R. Civ. P. 12(f)(2) insofar as Defendant's pleading contains redundant, immaterial, impertinent, and scandalous matters, Defendant's pleading was not drawn in conformity with Fed. R. Civ. P. 8(a)(2), 8(b)(1)(A), 8(b)(1)(B), 8(b)(2), (8)(c)(1), and (8)(d)(1), and Defendant is illegally practicing law on behalf of

a corporate entity despite Defendant not being a licensed attorney admitted to practice law before this Court and the Northern District of Ohio already ordering Martin Lindstedt to not so practice law. (1:19-CV-02103-SO, Doc. 19, PageID ## 195-195) (“But the court grants Plaintiff’s Second Motion to the extent it asks the court to strike Defendant’s assertion that he represents not only himself but also his Church of Jesus Christ Christian/Aryan Nations of Missouri. Ohio law forbids a non-lawyer like Defendant from representing a corporate entity. *See Disciplinary Counsel v. Givens*, 832 N.E.2d 1200, 1202 (Ohio 2005).”).

2. Alternatively to the Court striking Defendant’s Answer and Counter-Complaint (Doc. 6), for the reasons set forth within Plaintiff’s Brief, the Court should order Defendant to provide a more definite statement—pursuant to Fed. R. Civ. P. 12(e)—insofar as Defendant’s pleading is vague and ambiguous to such an extent that Plaintiff cannot make sense of Defendant’s factual averments, Defendant’s affirmative defenses, Defendant’s counterclaims, or what appears to be some sort of third-party complaint against third-parties Defendant wants to implead into the instant civil action.

WHEREFORE, Plaintiff prays that this Honorable Court will:

- A. Strike Defendant’s Answer and Counter-Complaint (Doc. 6) and enter default against Defendant as a sanction due to Defendant’s steadfast refusal to stop practicing law on behalf of third-parties and for using virulently offensive language in Defendant’s pleading;
or
- B. Alternatively order Defendant to provide a more definite statement by requiring Defendant to submit a pleading in conformity with Fed. R. Civ. P. 8; and
- C. Award Plaintiff any and all further relief which is warranted by law or equity.

Respectfully submitted,

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Dated: December 15, 2019

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Pro se Defendant

PLAINTIFF STEFANI ROSSI REO'S BRIEF IN SUPPORT OF
MOTION TO STRIKE DEEFNDANT'S ANSWER
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I. STATEMENT OF FACTS

A. PROCEDURAL HISTORY

On November 26, 2019, Martin Lindstedt (“Defendant”) removed the instant civil action to the Court after it had been filed behalf of Stefani Rossi Reo (“Plaintiff”) on September 9, 2019 by Counsel at the State of Ohio’s Lake County Court of Common Pleas. (Doc. 1 and Doc. 1-2). Plaintiff’s Complaint is eight pages in length and comports with the pleading requirements as prescribed by Fed. R. Civ. P. 8. (Doc. 1-2).

On December 10, 2019, Defendant filed a thirty-page pleading in response to Plaintiff’s Complaint. (Doc. 6). Said pleading can fairly be described as a rambling, incoherent screed—containing offensive language unbecoming for a federal court filing—which does not comport whatsoever with the pleading requirements as prescribed by Fed. R. Civ. P. 8 and which also violated the law insofar as Defendant—a non-lawyer—purported to file said pleading on behalf of not only himself but also Defendant’s corporate entity, Church of Jesus Chris Christian / Aryan Nations of Missouri. (Doc. 15).

On November 15, 2019, in the case 1:19-CV-02103-SO (Bryan Anthony Reo v. Martin Lindstedt), the court, via the Honorable Judge Solomon Oliver, struck from the record Martin Lindstedt’s Answer (Doc. 15) and ordered Defendant to file “an appropriate Amended Answer” within fourteen days of said order. (1:19-CV-02103-SO , Doc. 19).

On December 10, 2019, in the case 1:19-cv-02589-CAB (Bryan Anthony Reo v. Martin Lindstedt) the court, via the Honorable Magistrate Judge Parker, issued a report and recommendation to strike Martin Lindstedt’s Answer in that case, an Answer which is virtually identical to the Answer presently before this Court in the instant action. (1:19-cv-02589-CAB , Doc. 11).

On December, 10, 2019, Defendant Martin Lindstedt, has filed in this instant action, an Answer that is virtually identical in form and substance to the answer stricken by Judge Oliver and the answer recommended to be stricken by Magistrate Judge Parker (1:19-CV-02786-CAB, Doc. 6).

Plaintiff is now moving for the Court to strike Defendant's Answer and Counter-Complaint (Doc. 6) and to put Defendant in default as a sanction, or alternatively, for the Court to order Defendant to provide a more definite statement so Plaintiff can try to make sense out of Defendant's alleged defenses, counterclaims, and third-party claims.

B. FACTUAL HISTORY

Plaintiff is suing Defendant for tortious conduct arising out of Defendant having engaged in a vicious campaign of cyber harassment and defamation against Plaintiff. (Doc. 1-2, PageID # 9, ¶ 2). Plaintiff resides in City of Mentor, Lake County, State of Ohio, while Defendant resides in City of Granby, Newton County, State of Missouri. (Doc. 1-2, PageID # 9, ¶ 3). Defendant is subject to the personal jurisdiction of the Court via Ohio's long-arm statute, R.C. § 2307.382(A)(6); see also *Vangheluwe v. Got News, LLC*, 365 F.Supp.3d 850 (E.D. Mich. 2019) (by applying Sixth Circuit and Supreme Court case law, analyzing how long-arm personal jurisdiction may be exercised in the context of Internet defamation). (Doc. 1-2, PageID # 9, ¶ 5).

Defendant has a long history of defaming Plaintiff's Counsel [her husband], which resulted on June 26, 2019, in a jury awarding Plaintiff's Counsel against Defendant the sum of \$105,000.00 in money damages after Plaintiff sued Defendant for the same. (Doc. 1-2, PageID # 9, ¶ 7). Since Defendant lost that civil action, Defendant has continued his campaign of online defamation against Bryan Reo and has now shifted his focus to Bryan Reo's relatives, specifically his wife, the Plaintiff, which gives rise to the instant civil action. (Doc. 1-2, PageID # 10-11). Plaintiff has

raised claims against Defendant for common law defamation, common law invasion of privacy (false light), and common law intentional infliction of emotional distress, and Plaintiff is seeking compensatory and punitive damages, in addition to a permanent injunction whereby Defendant would be compelled to remove from the Internet any not republish thereto defamatory material Defendant has published there. (Doc. 1-2, PageID # 11-14).

Despite Defendant previously being admonished to not file any document with Northern District of Ohio on behalf of Defendant's corporate entity (1:19-CV-02103-SO, Doc. 19, PageID ## 195-195), Defendant has again done so: Defendant signed his most pleading, "Pastor Martin Lindstedt, Defendant of and for The Church of Jesus Christ Christian / Aryan Nations of Missouri" (Doc. 6, PageID # 55), Defendant has named his corporate entity as a party to the instant civil action as some sort of procedurally improper way to try to implead it or to acquire intervenor status.

In 1:19-CV-02103-SO , the court's November 15, 2019, Order, the court granted Plaintiff's motion to strike Defendant's original pleading for the following reason:

Defendant's Amended Answer and Counterclaims (ECF No. 15) consist of rambling, largely irrelevant arguments, which are rife with personal insults and racial slurs. Defendant seeks to joint a number of parties: (1) Plaintiff's wife and father, Stefani Rossi Reo and Anthony Domenic Reo; (2) three individuals, Kyle Bristow, Brett Klimkowsky, and William Finck, who Defendant describes as Plaintiff's "provacateur" co-conspirators; (3) the Court of Common Pleas of Lake County and Lake County Judge Patrick Condon; (4) the State of Ohio; and (5) the United States Government. Defendant also maintains that his Church of Jesus Christ Christian/Aryan Nations of Missouri is a party to this action. But each of these parties, and the claims Defendant purports to bring against them, are irrelevant to Plaintiff's tort action. More importantly, the arguments throughout the Amended Complaint and Counterclaims are offensive and plainly lacking merit.

(Doc. 19, PageID # 196).

Defendant's Answer presently before this Court in this instant action (Doc. 6) is largely identical to the answer stricken by Judge Oliver and to the answer recommended to be stricken by

Magistrate Judge Parker in that it: (1) consists of rambling, largely irrelevant arguments—which are rife with personal insults and racial slurs; (2) seeks to join a number of third-parties to the case at bar who are completely irrelevant to the instant controversy; and (3) Defendant again alleges that his Church of Jesus Christ Christian / Aryan Nations of Missouri is a party. Some of the more choice personal insults and racial slurs—which are beneath the dignity of this Court and should obviously have no part in being in the Court’s file—include but are not limited to:

1. Defendant slurring Plaintiff’s Counsel and her father-in-law as “homosexual mongrels.” (Doc. 6, PageID 29). Defendant further concedes that Plaintiff’s father-in-law is not a homosexual mongrel, but rather “a mongrel yes, but probably not a homosexual mongrel.” (Doc. 6, PageID 29).
2. Defendant slurs Plaintiff and claims she committed immigration visa fraud by coming to the USA from Brazil in what Defendant describes as a sham marriage and that Plaintiff is a “Brazilian Sephardic Jewess that wanted to come to America.” (Doc 6, page 39).
3. Defendant slurs Plaintiff by claiming she married a homosexual as part of a corrupt bargain to obtain an immigration visa, and that her marriage is fraudulent. (Doc. 6, PageID 41).
4. Defendant slurs Plaintiff’s Counsel as “a predatory homosexual [.]” (Doc. 6, PageID 41).
5. Defendant states Plaintiff’s Counsel is a “homosexual” who was “trying to blackmail them (men) into having homosexual sex with Reo.” (Doc. 6, PageID 39).
6. Defendant states Plaintiff is “
7. Defendant repeatedly writes about how Defendant was previously criminally prosecuted for sodomizing a young child, which is not relevant to the instant civil action. (Doc. 6, *passim*).

II. ISSUES PRESENTED

1. Whether the Court should strike Defendant's Answer and Counter-Complaint (Doc. 6) and enter default against Defendant as a sanction.

Plaintiff's Answer: Yes.

Defendant's Presumed Answer: No.

2. If the Court does not strike Defendant's Answer and Counter-Complaint (Doc. 6), whether the Court should alternatively order Defendant to provide a more definite statement concerning the same.

Plaintiff's Answer: Yes.

Defendant's Presumed Answer: No.

III. LAW & ARGUMENT

Plaintiff is moving to strike Defendant's Answer and Counter-Complaint (Doc. 6) pursuant to Fed. R. Civ. P. 12(f)(2) and, in the alternative, for the Court to order Defendant to provide a more definite statement concerning the same pursuant to Fed. R. Civ. P. 12(e). Pursuant to Fed. R. Civ. P. 12(g)(1), Plaintiff enjoys the right to jointly request both forms of relief.

A. THE COURT SHOULD STRIKE DEFENDANT'S ANSWER AND COUNTER-COMPLAINT AND ENTER DEFAULT AGAINST DEFENDANT AS A SANCTION

1. STANDARD OF REVIEW

As the Court observed in its November 15, 2019, Order:

Federal Rule of Civil Procedure 12(f) provides, in relevant part, that “[t]he court may strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.” Fed. R. Civ. P. 12(f). Courts wield broad discretion when deciding such motions. *See Malibu Media, LLC v. Doe*, No. 1:14-CV-2293, 2015 WL 5730756, at *2 (N.D. Ohio Sept. 29, 2015). However, motions to strike are generally disfavored because, given “the practical difficulty of deciding cases without a factual record[,] . . . [i]t is a drastic remedy to be resorted to only when required for the purposes of justice.” *See Brown & Williamson Tobacco Corp. v. United States*, 201 F.2d 819, 822 (6th Cir. 1953) (citations omitted). Thus, courts may choose to grant parties leave to amend their deficient pleadings rather than strike them. *Revolaze, LLC v. Target Corp.*, No. 1:17-CV-2417, 2018 WL 8838853, at *1 (N.D. Ohio July 31, 2018). Nonetheless, courts retain “liberal discretion” to strike filings as they deem appropriate. *See In re Keithley Instruments, Inc.*, 599 F. Supp. 2d 908, 911 (N.D. Ohio 2009) (citation omitted).

(Doc. 19, PageID # 194-195).

2. PRINCIPAL POINT OF ARGUMENT

In the instant case, Defendant's Answer and Counter-Complaint (Doc. 6) insufficiently denies the allegations of fact as set forth within Plaintiff's Complaint (Doc. 1-2) and is replete with redundant, immaterial, impertinent, and scandalous averments. It is just and proper for the Court to strike from the record Defendant's pleading and to sanction Defendant by putting him in default.

Defendant was warned by the Court to not file such offensive diatribes with the Court, and Defendant double downed by doing so again.

If needlessly slurring people as “mamzers,” “homosexuals,” “mongrels,” and discussing their race is not grounds for striking a pleading which drags innocent third-parties into the civil action by naming them as third-party defendants, what is? If it is illegal for Defendant—who is not a licensed lawyer—to advocate on behalf of a corporate entity like his Church of Jesus Christ Christian/Aryan Nations of Missouri in court filings, and Defendant continues to do so despite being warned by the Court in the form of a written order, then why should Defendant not be sanctioned for his contemptuous conduct in the form of default being entered against him?

3. CONCLUSION

For the reasons set forth herein, the Court should strike Defendant’s Answer and Counter-Complaint (Doc. 6) and enter default as a sanction against Defendant.

B. THE COURT SHOULD ORDER DEFENDANT TO PROVIDE A MORE DEFINITE STATEMENT SO THAT PLAINTIFF CAN TRY TO MAKE SENSE OUT OF DEFENDANT’S ANSWER AND COUNTER-COMPLAINT

1. STANDARD OF REVIEW

Fed. R. Civ. P. 12(e) states:

e) MOTION FOR A MORE DEFINITE STATEMENT. A party may move for a more definite statement of a pleading to which a responsive pleading is allowed but which is so vague or ambiguous that the party cannot reasonably prepare a response. The motion must be made before filing a responsive pleading and must point out the defects complained of and the details desired. If the court orders a more definite statement and the order is not obeyed within 14 days after notice of the order or within the time the court sets, the court may strike the pleading or issue any other appropriate order.

A complaint need only provide a “short and plain statement of the claim showing that the pleader is entitled to relief.” Fed. R. Civ. P. 8(a)(2). Thus, to satisfy the pleading requirements a claimant need only give the opposing party a “fair notice of what the plaintiff’s claim is and the

grounds upon which it rests.” *Conley v. Gibson*, 355 U.S. 41, 47 (1957); see also *Sky Technologies Partners, LLC v. Midwest Research Institute*, 125 F. Supp. 2d 286, 298 (S.D. Ohio 2000) (“A motion for more definite statement is granted only when the pleading is so vague that it is unreasonable to expect that a responsive pleading may or can be framed.”)

2. PRINCIPAL POINT OF ARGUMENT

In the instant case, Defendant’s Answer and Counter-Complaint (Doc. 6) is vague and ambiguous to such an extent that Plaintiff cannot make sense of it. It appears that Defendant is illegally representing Defendant’s Church of Jesus Christ Christian/Aryan Nations of Missouri which is trying to appear as an intervening party by filing a third-party claim against Plaintiff, it look as if Defendant is impleading a number of individuals and governmental actors and is filing third-party claims against them which are irrelevant to Plaintiff’s claims against Defendant, it seems that Defendant is trying to assert counterclaims against Plaintiff, and it looks like Defendant is trying to conjure up an affirmative defense or two in between Defendant’s rambling about “mamzers” and “mongrels” conspiring to violate his First Amendment rights.

It is unreasonable for Plaintiff to be expected to respond to Defendant’s pleading, which requires a response insofar as Defendant is purportedly asserting counterclaims against Plaintiff. In order for Plaintiff to be able to effectively respond to a pleading, it should be drafted in conformity with Fed. R. Civ. P. 8.

In the instant case, Defendant’s countercomplaint does not set forth a short and plain statement of the claim showing that Defendant is entitled to relief—which is required by Fed. R. Civ. P. 8(a)(2). Defendant’s counterclaims are vague and ambiguous; the only thing which is crystal clear about Defendant’s pleading is that Defendant has a very low opinion of Plaintiff. (Doc. 6).

With regards to Defendant's response to Plaintiff's claims, Defendant did not state in short and plain terms Defendant's defenses—which is required by Fed. R. Civ. P. 8(b)(1)(A). Furthermore, Defendant did not "admit or deny the allegations" asserted against Defendant—which is required by Fed. R. Civ. P. 8(b)(1)(B)—, and no denial raised by Defendant fairly responded to the substance of Plaintiff's allegations—which is required by Fed. R. Civ. P. 8(b)(2). Instead, Defendant provided lengthy and convoluted narratives which are as offensive as they are unintelligible.

Defendant also did not affirmative state any affirmative defenses in a list format as is required by Fed. R. Civ. P. 8(c)(1). In Defendant's invectives, it appears that Defendant might be trying to raise an affirmative defense or two to justify Defendant's misconduct against Plaintiff, but it is not clear to Plaintiff as to what specific affirmative defenses Defendant intends to rely upon. (Doc. 6, *passim*). Plaintiff cannot efficiently or effectively litigate the instant civil action without being put on reasonable notice as far as what Defendant intends to prove moving forward.

Fed. R. Civ. P. 8(d)(1) commands that "Each allegation must be simple, concise, and direct." For the case at bar, Defendant's allegations are complicated, verbose, and indirect. (Doc. 6).

3. CONCLUSION

For the reasons set forth herein, if the Court does not outright strike Defendant's Answer and Counter-Complaint (Doc. 6), the Court should order Defendant to provide a more definite statement so that Plaintiff can try to make sense out of it. Specifically, Defendant should be ordered to provide a statement which comports with Fed. R. Civ. P. 8(b)(1)(A), 8(b)(1)(B), 8(b)(2), (8)(c)(1), and (8)(d)(1).

IV. PRAYER FOR RELIEF

For the reasons set forth herein, the Court should strike Defendant's Answer and Counter-Complaint (Doc. 6) and enter default against Defendant as a sanction for repeated unauthorized practice of law. The Court can and should consider ordering Defendant to personally show cause before the Court as to why such relief should not be granted.

In the alternative, the Court should order Defendant to provide a more definite statement by requiring Defendant to submit an amended pleading in conformity with Fed. R. Civ. P. 8.

Respectfully submitted,

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Dated: December 15, 2019

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Pro se Defendant

CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am Counsel for Plaintiff in the above-captioned civil action, and on December 15, 2019, I served a true and accurate copy of this Certificate of Service, Plaintiff's Brief in Support of Plaintiff's Motion to Strike Defendant's Answer and/or for a More Definite Statement, and Plaintiff's Motion to Strike Defendant's Answer and/or for a More Definite Statement 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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Dated: December 15, 2019