

**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

**REO LAW, LLC**

Bryan Anthony Reo (#0097470)

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*Attorney for Plaintiff Stefani Rossi Reo*

**MARTIN LINDSTEDT**

338 Rabbit Track Road

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*Pro se Defendant*

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**PLAINTIFF STEFANI ROSSI REO’S FIRST SET OF REQUESTS FOR ADMISSIONS,  
INTERROGATORIES, AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANT MARTIN LINDSTEDT**

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NOW COMES Stefani Rossi Reo (“Plaintiff”), *by and through the undersigned counsel* and hereby propounds upon Martin Lindstedt (“Defendant”) Plaintiff Stefani Rossi Reo’s First Set of Requests for Admissions, Interrogatories, and Requests for Production of Documents to Defendant Martin Lindstedt pursuant to Fed. R. Civ. P. 26, 33, 34, and 36, to be answered by Defendant within thirty (30) days of service thereof.

**DEFINITIONS AND INSTRUCTIONS**

- A. These discovery requests are governed by the Federal Rules of Civil Procedure and the United States Code.
- B. The answers you provide to these discovery requests are to be typed or printed legibly in the English language.

- C. For each discovery request to which you object to answering it either partially or fully, explain in detail your objection, and if you are making an objection on the basis that said discovery request is burdensome, state: (1) the number of documents needed to be searched; (2) the location of the documents; (3) the estimated number of hours required to conduct a search and review of the documents; and (4) the estimated cost of searching for and reviewing the records in United States dollars.
- D. Other than the specific definitions set forth in the Federal Rules of Civil Procedure or *infra*, the words contained herein are to be understood by their plain meaning, as defined by the *Merriam-Webster Online Dictionary*, which is available at <<http://www.merriam-webster.com>>.
- E. “Plaintiff” refers to the Stefani Rossi Reo and her agents and employees.
- F. “Defendant” refers to Martin Lindstedt and his agents and employees.
- G. “Parties” means Plaintiff and Defendant collectively.
- H. “Document” or “documents” means the original or a true and accurate copy of any tangible or electronically stored item in any medium now known or to be invented to which you have actual or constructive knowledge of its current or former existence. Document and documents includes but is not limited to any designated tangible or electronically stored information—including writings, letters, memorandums, electronic mail, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained. See Fed. R. Civ. P. 34(a)(1).
- I. These Discovery Requests shall be construed to be continuing in nature so as to require prompt further and supplemental amendments if you acquire actual or constructive knowledge that its answers are not fully accurate. See Fed. R. Civ. P. 26(e).

### **INTERROGATORIES**

**INTERROGATORY NO. 1:** State and any all facts known to you which evince that Defendant was not directing Defendant’s tortious conduct—as described within Plaintiff’s Complaint—to the State of Ohio so as to cause injury to Plaintiff in said state.

**ANSWER:**

**INTERROGATORY NO. 2:** State and any all facts known to you which evince that Plaintiff is a transgender prostitute.

**ANSWER:**

**INTERROGATORY NO. 3:** State and any all facts known to you which evince that Plaintiff does not have a real vagina.

**ANSWER:**

**INTERROGATORY NO. 4:** State and any all facts known to you which evince that Plaintiff has at any time engaged in prostitution.

**ANSWER:**

**INTERROGATORY NO. 5:** State and any all facts known to you which evince that Plaintiff is not a biological female.

**ANSWER:**

**INTERROGATORY NO. 6:** State and any all facts known to you which evince that Plaintiff committed immigration fraud with a sham marriage.

**ANSWER:**

**INTERROGATORY NO. 7:** State and any all facts known to you which evince that Plaintiff 's marriage with Bryan Anthony Reo was entered into as a sham for immigration purposes.

**ANSWER:**

**INTERROGATORY NO. 8:** State and any all facts known to you which evince that Plaintiff has ever been charged with any crime, whether prostitution related or otherwise.

**ANSWER:**

**INTERROGATORY NO. 9:** State and any all facts known to you which evince that Plaintiff is not a non-public figure for purposes of First Amendment jurisprudence.

**ANSWER:**

**INTERROGATORY NO. 10:** State the names and addresses of any and all people who have personal knowledge of the facts as detailed within Defendant's answers to Interrogatories Nos. 1 through 10.

**ANSWER:**

**INTERROGATORY NO. 11:** State the facts—if any—which support Defendant’s contention—if Defendant has one—that Defendant enjoys one or more affirmative defenses so as to justify or mitigate Defendant’s liability to Plaintiff.

**ANSWER:**

**REQUESTS FOR ADMISSIONS**

**REQUEST FOR ADMISSION NO. 1:** Please admit that at all times relevant to the controversy as described within Plaintiff’s Complaint, Defendant knew that Plaintiff is a resident of the State of Ohio.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 2:** Please admit that at all times relevant to the controversy as described within Plaintiff’s Complaint, Defendant knew that Defendant’s acts of commission as described within Plaintiff’s Complaint would cause Plaintiff to suffer damages in the State of Ohio.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 3:** Please admit that at all times relevant to the controversy as described within Plaintiff’s Complaint, Defendant purposefully acted in a tortious manner so as to cause Plaintiff to suffer damages in the State of Ohio.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 4:** Please admit that throughout June 2019 to October 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had worked as a prostitute and had met her husband Bryan Anthony Reo in the context of prostitution.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 5:** Please admit prostitution is a crime in Ohio.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 6:** Please admit that prostitution is a crime in Missouri.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 7:** Please admit that prostitution is a crime which would result in a finding of inadmissibility for immigration purposes.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 8:** Please admit Plaintiff has never engaged in prostitution.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 9:** Please admit Plaintiff is a biological female.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 10:** Please admit Plaintiff has never committed any crime of any sort.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 11:** Please admit that you possess no evidence to support the alleged truth of any of the allegedly defamatory statements that give rise to Plaintiff's complaint in the instant action.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 12:** Please admit that you know of no evidence that would support the alleged truth of any of the allegedly defamatory statements that give rise to Plaintiff's complaint in the instant action.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 15:** Please admit that Defendant is liable to Plaintiff for defamation for the reasons articulated in Paragraphs 7 through 31 of Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 16:** Please admit that Defendant is liable to Plaintiff for invasion of privacy—false light—for the reasons articulated in Paragraphs 7 through 38 of Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 17:** Please admit that Defendant is liable to Plaintiff for intentional infliction of emotional distress for the reasons articulated in Paragraphs 7 through 43 of Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 18:** Please admit Plaintiff is entitled to permanent injunctive relief against Defendant for the reasons articulated in Paragraphs 44 through 50 of Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 19:** Please admit that Defendant caused willful and malicious injury—as these terms are defined by 11 U.S.C. § 523(a)(6)—to Plaintiff for the reasons alleged in Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 20:** Please admit that Defendant does not have a meritorious affirmative defense in relation to any and all causes of action Plaintiff pled against Defendant in Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 21:** Please admit that Plaintiff never committed an act of commission or omission against Defendant for which Plaintiff is liable to Defendant for money damages.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 22:** Please admit that for purposes of First Amendment jurisprudence, Plaintiff is a non-public figure.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 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.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 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.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 25:** Please admit to the truth of all allegations, factual and legal, contained within Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 26:** Please admit that your counterclaim or claims pending against Plaintiff Stefani Rossi Reo, if any, are wholly lacking in merit.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 27:** Please admit that your counterclaim or claims pending against Plaintiff Stefani Rossi Reo, if any, are without any evidentiary or factual basis.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 28:** Please admit that you damaged Plaintiff in an amount of \$250,000 in general damages and \$250,000 in punitive damages.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 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.

**ANSWER:**

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION OF DOCUMENTS #1:** Produce true and accurate copies of any and all documents which you believe evince that Defendant was not directing Defendant's tortious conduct—as described within Plaintiff's Complaint—to the State of Ohio so as to cause injury to Plaintiff in said state.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #2:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in prostitution.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #3:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff is not a biological female.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #4:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff does not have a real vagina.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #5:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has ever committed immigration fraud via entering into a sham marriage.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #6:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff is not a non-public figure for purposes of First Amendment jurisprudence.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #7:** Produce true and accurate copies of any and all documents which you believe evince that Defendant enjoys one or more affirmative defenses so as to justify or mitigate Defendant's liability to Plaintiff.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS #8:** Produce true and accurate copies of any and all documents which you believe evince that Defendant's Counterclaims [if any] against Plaintiff have a basis in fact.

**ANSWER:**

Sincerely,

/S/. BRYAN ANTHONY REO

Bryan Anthony Reo

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

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*Attorney for Plaintiff Stefani Rossi Reo*

Dated: May 15, 2020



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*Attorney for Plaintiff Stefani Rossi Reo*

**MARTIN LINDSTEDT**

338 Rabbit Track Road

Granby, MO 64844

(T): (417) 472-6901

(E): pastorlindstedt@gmail.com

*Pro se Defendant*

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**CERTIFICATE OF SERVICE**

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I, Bryan A. Reo, affirm that I am a counsel to Plaintiff in the above-captioned civil action, and on May 15, 2020, I served a true and accurate copy of the foregoing document to Defendant Martin Lindstedt to 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.

Furthermore, I affirm that on May 15, 2020, I electronically emailed to <pastorlindstedt@gmail.com> a PDF version of the foregoing document to Defendant Martin Lindstedt.

/s/ Bryan Anthony Reo  
Bryan Anthony Reo (#0097470)  
P.O. Box 5100  
Mentor, OH 44061  
(T): (440) 313-5893  
(E): reo@reolaw.org

*Attorney for Plaintiff Stefani Rossi Reo*

Dated: May 15, 2020