

**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

Granby, MO 64844

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*Pro se Defendant*

**PLAINTIFF STEFANI ROSSI REO'S**  
**MOTION FOR STATUS CONFERENCE FOR FINAL RESOLUTION**  
**OF CASE OR FOR RULINGS ON OUTSTANDING MOTIONS**

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 for Status Conference for Final Resolution of Case or for Rulings on Outstanding Motions.

1. On or about September 9, 2019, Plaintiff filed against Defendant Plaintiff’s Complaint, which included Count I (Defamation), Count II (Invasion of Privacy – False Light), Count III (Intentional Infliction of Emotional Distress), among other causes of action.

2. On March 30, 2021, this Court adopted the Magistrate’s Alternative Recommendation and granted Plaintiff’s motion for summary judgment. (ECF No. 48).

3. Most pertinently this Court awarded \$250,000.00 in compensatory damages and \$250,000.00 in punitive damages to Plaintiff.

4. Plaintiff, in her partial objections to the Magistrate's Recommendations, consented to the dismissal of Count III of Plaintiff's Complaint. (ECF No. 42). Plaintiff also waived objections to the dismissal of Count IV for Permanent Injunction (ECF No. 42).

5. In the March 30, 2021 order, the Court dismissed Count III and Count IV of Plaintiff's Complaint. (ECF No. 48).

6. There is a pending Report and Recommendation dated December 3, 2020 wherein the Magistrate recommends dismissing Defendant Lindstedt's "Counter-claim" against Plaintiff. (ECF No. 41).

7. Plaintiff has also filed a proposed judgment entry (ECF No. 50) which memorializes the opinion and order of March 30, 2021.

8. Plaintiff therefore respectfully notes that if the Court enters judgment to memorialize its opinion and order of March 30, 2021 and dismisses Defendant's "Counter-Claims" then the instant action would be fully resolved as nothing else would remain in controversy and there would be nothing left to adjudicate.

9. Once those matters are resolved, the entire case will be permanently resolved.

10. Plaintiff is appreciative of the judicial resources already expended on this case and understands the difficulty with which this case has proceeded based on the difficulties caused by Defendant and having to deal with Defendant. Plaintiff respects the Court and the Court's time and only wishes to see these matters resolved expeditiously so that all those involved and concerned may move forward.

11. Furthermore, there is a pending case in South Dakota, 58Civ20-07 in the Circuit Court of South Dakota for the Sixth Judicial Circuit, involving Plaintiff's Counsel [as a judgment creditor] and defendant Martin Lindstedt, the resolution of which will be influenced by the speed and time of the resolution of this instant action. The court in South Dakota has announced that they are waiting for the final resolution of all pending Reo-Lindstedt matters in Ohio before proceeding to final resolution on the action to set aside fraudulent conveyance of real property in South Dakota.

12. Finally, Defendant Martin Lindstedt has sued Plaintiff's Counsel in United States District Court for the Western District of Missouri [21-5029-CV-SW] on claims [of conspiracy] that are essentially identical to the counter-claims and third-party complaint claims he has pleaded against Bryan Anthony Reo in the various Reo cases involving Lindstedt. The final resolution of the Reo-Lindstedt matters in the Northern District of Ohio will allow Bryan Anthony Reo to obtain dismissal in the District of Western Missouri via Res Judicata and will conserve judicial resources in Missouri.

13. It is the hope of Plaintiff and Plaintiff's Counsel that the final resolution of the instant action, along with the other Reo-Lindstedt cases that are also [ideally] close to final resolution, will close the chapter on the Reo-Lindstedt matters in the Northern District of Ohio, allow for prompt resolution of the case filed by Mr. Lindstedt in Missouri, and provide the court in South Dakota a path to finally resolve a case which has now been pending in South Dakota for approximately 18 months. It is the intention, hope, and goal of Plaintiff and Plaintiff's Counsel to be forever done with litigation involving Mr. Lindstedt. The final resolution of this case with the rendering of formal judgment for Plaintiff will greatly further that goal.

WHEREFORE, Plaintiff prays that this Honorable Court will dismiss Defendant's Counter-claims and proceed to formally render judgment for Plaintiff. Alternatively, Plaintiff

would prayerfully request a status conference to establish a timetable and procedure for the final resolution of this case as to the procedure for judgment being rendered and disposition of outstanding claims/counter-claims.

Respectfully submitted,

**REO LAW, LLC**

/S/. BRYAN ANTHONY REO

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*Attorney for Plaintiff Stefani Rossi Reo*

Dated: June 23, 2021

**CERTIFICATE OF SERVICE**

I, Bryan Anthony Reo, affirm that I am counsel of record to a party to the above-captioned civil action, and on June 23, 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.

I have also electronically filed the foregoing document which should serve notice of the filing of the same upon each party who has appeared through counsel, via the court's electronic filing notification system.

/S/ BRYAN ANTHONY REO

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*Attorney for Plaintiff Stefani Rossi Reo*

Dated: June 23, 2021