

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

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT.,

Defendant.

Case No. 1:19-cv-02103-SO

Hon. Solomon Oliver, Jr.

Mag. Jonathan D. Greenberg

**BRIEF IN OPPOSITION TO DEFENDANT BEING
GIVEN ELECTRONIC FILING PRIVILEGES**

NOW COMES Bryan Anthony Reo, Plaintiff Pro Se, and hereby provides the following as his brief in opposition to Defendant's motion for electronic filing privileges.

The instant action has been pending before this court for less than three weeks, Defendant has had ample opportunity to file an answer in compliance with the FRCP, but instead Defendant has opted to file bizarre and offensive documents which make use of racial slurs and derogatory language. In short, Defendant is not deserving of the sort of consideration he requests.

Defendant has actually stooped so low as to use the word "nigger" in his recent document entitled **Motion to Consolidate four present cases of frivolous and vexatious litigation against lone Defendant by Attorney Bryan Reo, Bryan Reo's wife and father up from the Lake County Court to this Federal Court for hearing and possible Trial on the Merits.** There can be no excuse for such conduct.

In his **Motion for case to proceed upon Merits regardless of Defendants' ignorance of the Federal Civil Rules of this case and Bryan Reo's Predatory Professional Plaintiff Acumen, Motion for Extension of Time for a Quick Answer / Pleading & Request for Jury Trial to give additional time to make a more thorough Amended Answer**, Defendant perpetrates a fraud upon this Court by claiming to be ignorant of the Federal Rules of Civil Procedure in an obvious attempt to elicit [undeserved] sympathy in hopes of receiving latitude and leeway from this Court.

A search of Pacer for the 8th Circuit Court of Appeals and the Western District of Missouri reveals several dozen federal cases involving Defendant [most initiated by Defendant as a pro se serial filer against government officials]. Some of those cases are as follows-

Martin Lindstedt v. Kay Baum, 0:1997cv02892 (8th Circ. 1997)

Martin Lindstedt v. MO Libertarian et al., 1997cv03351 (8th Circ. 1997)

Martin Lindstedt v. Craig Hopper et al., 0:1997cv03540 (8th Circ. 1997)

Martin Lindstedt v. Jasper County MO et al., 0:1998cv01896 (8th Circ. 1998)

Martin Lindstedt v. MO Libertarian et al., 0:1998cv02503 (8th Circ. 1998)

Martin Lindstedt v. MO Jasper Cty. MO et al., 0:1998cv03949 (8th Circ. 1998)

Martin Lindstedt v. MO Southern State et al., 0:1999cv01032 (8th Circ. 1999)

Martin Lindstedt v. City of Granby et al., 0:1999cv02624 (8th Circ. 1998)

Martin Lindstedt v. Matt Blunt et al., 0:2005pr03173 (8th Circ. 2005)

Bryan Reo v. Martin Lindstedt, 0:2015cv03756 (8th Circ. 2015- Lindstedt was Appellant, his appeal was denied)

Reo v. Lindstedt, 3:2014cv05093 (Missouri Western District Court 2015)

All of Lindstedt's appeals began as cases in United States District Court for the Western District of Missouri, the shortest one lasted 6 days [Lindstedt v. Hopper 3:1997mc05074] while some took several months to be flagged as frivolous and dismissed.

Defendant Lindstedt is clearly intimately familiar with the Federal Rules of Civil Procedure including those for appeals, it simply seems he elects not to adhere to those rules. Defendant Lindstedt has chosen to embark on a campaign of defamation and harassment against the Plaintiff and the entire Reo family and has now chosen to bombard and barrage this Court with frivolous and racially abusive pleadings. Giving this Defendant electronic filing privileges will result in the opening of the dam gates and a mountain of frivolous papers will bury this Court and this Plaintiff courtesy of Defendant who is frankly a litigation terrorist who uses sovereign citizen arguments and overwhelming paper as the go-to tools of his trade.

Some of Lindstedt's appeals were decided in less than 8 weeks and were unsurprisingly dismissed as frivolous. Defendant has a long history of frivolous and abusive filings. Indeed, Defendant was recently sanctioned \$4,000.00 by a court in Missouri for a frivolous action he initiated and prosecuted against the City of Granby. See Pastor Martin Luther Dzerzhinsky Lindstedt v City of Missouri et al., 18NW-CV00601 (Circuit Court Newton County Missouri 2018) judgment of sanction of \$4,000.00 entered against Lindstedt on July 25, 2018.

The only break, or gap, in Lindstedt's litigation terrorist history was when he was incarcerated and institutionalized for approximately 5 years after being charged with statutory

sodomy on a minor under 12 years of age [see Exhibit 1- an article from the ADL detailing Defendant's indictment and arrest for child molestation]

Lindstedt is no stranger to state court litigation. A search of the 40th Judicial Circuit for the Missouri state court system and a search of the Western Appellate District will reveal at least 24 separate cases involving Martin Lindstedt, suing a variety of entities and individuals ranging from the County in which he resides, the city in which he resides, the sheriff of the county in which he resides, and other local and state officials. In short, Mr. Lindstedt is a litigation terrorist.

At the recent trial, *Bryan Anthony Reo v. Martin Lindstedt*, 15CV001590 (Lake County Court of Common Pleas- verdict rendered 6/26/2019) Lindstedt declared that he had a superior legal knowledge relative to the presiding judge and to attorney Reo. Lindstedt bragged that he had thoroughly studied the Federal Rules of Civil Procedure, substantive law, and various state civil rules while institutionalized and incarcerated and that he was intimately familiar with all relevant and applicable civil rules.

Lindstedt should be denied electronic filing privileges until he is capable of demonstrating that he will actually abide by the requirements to be allowed to e-file and will refrain from deluging this Court and this Plaintiff with obscene, absurd, and racially abusive content.

Respectfully submitted,

REO LAW, LLC

/s/ Bryan A. Reo

Bryan A. Reo, Esq.
P.O. Box 5100
Mentor, OH 44061
(Business): (216) 505-0811
(Mobile): (440) 313-5893
(Email): reo@reolaw.org
Ohio Law License - #0097470
Attorney and Plaintiff Pro Se

Dated: October 1, 2019

CERTIFICATE OF SERVICE

I, Bryan A. Reo, affirm that I am the Plaintiff in the above-captioned civil action, and on October 1, 2019, I electronically filed this document with the Clerk of the Court by using the Court's Electronic Filing System, which should send notification of said filing to all attorneys of record who are registered to receive such electronic service for the instant civil action.

Additionally an electronic copy has been dispatched to pastorlindstedt@gmail.com which is the defendant's email address.

/s/ Bryan A. Reo
Bryan A. Reo, Esq.
P.O. Box 5100
Mentor, OH 44061
(Business): (216) 505-0811
(Mobile): (440) 313-5893
(Email): reo@reolaw.org
Ohio Law License - #0097470
Attorney and Plaintiff Pro Se

Dated: October 1, 2019