

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

REO LAW, LLC

Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(T): (440) 313-5893

(E): reo@reolaw.org

Pro se Plaintiff

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(T): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

**PLAINTIFF BRYAN ANTHONY REO'S FIRST SET OF REQUESTS FOR
ADMISSIONS, INTERROGATORIES, AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT MARTIN LINDSTEDT**

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Martin Lindstedt ("Defendant") Plaintiff Bryan Anthony 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 Bryan Anthony Reo and his 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 has engaged in barratry.

ANSWER:

INTERROGATORY NO. 3: State and any all facts known to you which evince that Plaintiff has engaged in vexatious litigation.

ANSWER:

INTERROGATORY NO. 4: State and any all facts known to you which evince that Plaintiff has engaged in the crime of stalking.

ANSWER:

INTERROGATORY NO. 5: State and any all facts known to you which evince that Plaintiff has stalked a man for purposes of coercing homosexual sexual conduct from the same.

ANSWER:

INTERROGATORY NO. 6: State and any all facts known to you which evince that Plaintiff has conspired with an Ohio judge to corrupt jury proceedings occurring in June of 2019.

ANSWER:

INTERROGATORY NO. 7: State and any all facts known to you which evince that Plaintiff has engaged in the crime of perjury.

ANSWER:

INTERROGATORY NO. 7: State and any all facts known to you which evince that Plaintiff has engaged in professional misconduct in the form of Plaintiff filing a frivolous complaint against Defendant.

ANSWER:

INTERROGATORY NO. 8: State and any all facts known to you which evince that Plaintiff had planned to travel to Paraguay in order to obtain a sex reassignment surgery due to Plaintiff suffering from mental illness.

ANSWER:

INTERROGATORY NO. 9: State and any all facts known to you which evince that Plaintiff has engaged in adultery.

ANSWER:

INTERROGATORY NO. 10: 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. 11: 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. 12: 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 on September 9, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had used the Lake County Court of Common Pleas for purposes of “barratry.”

ANSWER:

REQUEST FOR ADMISSION NO. 5: Please admit barratry is defined as the use of vexatious litigation or the incitement to it.

ANSWER:

REQUEST FOR ADMISSION NO. 6: Please admit that barratry constitutes unprofessional conduct pursuant to the Ohio Rules of Professional Conduct.

ANSWER:

REQUEST FOR ADMISSION NO. 7: Please admit that vexatious litigation constitutes unprofessional conduct pursuant to the Ohio Rules of Professional Conduct.

ANSWER:

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

ANSWER:

REQUEST FOR ADMISSION NO. 9: Please admit Plaintiff has never engaged in vexatious litigation.

ANSWER:

REQUEST FOR ADMISSION NO. 10: Please admit on September 14, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had engaged in stalking.

ANSWER:

REQUEST FOR ADMISSION NO. 11: Please admit that on September 14, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had stalked a man for purposes of coercing homosexual sexual conduct from the same.

ANSWER:

REQUEST FOR ADMISSION NO. 12: Please admit that stalking constitutes a criminal offense pursuant to Ohio Revised Code Section 2903.211.

ANSWER:

REQUEST FOR ADMISSION NO. 13: Please admit Plaintiff never stalked a man via the worldwide web.

ANSWER:

REQUEST FOR ADMISSION NO. 14: Please admit Plaintiff never attempted to coerce homosexual sexual conduct from a man.

ANSWER:

REQUEST FOR ADMISSION NO. 15: Please admit that on September 17, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had conspired with an Ohio judge to corrupt jury proceedings occurring in June of 2019.

ANSWER:

REQUEST FOR ADMISSION NO. 16: Please admit that it would constitute unprofessional conduct pursuant to the Ohio Rules of Professional Conduct for Plaintiff to conspire with an Ohio judge to corrupt jury proceedings.

ANSWER:

REQUEST FOR ADMISSION NO. 17: Please admit that on October 2, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had engaged in perjury.

ANSWER:

REQUEST FOR ADMISSION NO. 18: Please admit that perjury constitutes a criminal offense pursuant to Ohio Revised Code Section 2921.11.

ANSWER:

REQUEST FOR ADMISSION NO. 19: Please admit that on October 15, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had conspired with an Ohio judge to submit perjured testimony so as to engage in barratry.

ANSWER:

REQUEST FOR ADMISSION NO. 20: Please admit on October 25, 2018, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had filed a frivolous complaint against Defendant.

ANSWER:

REQUEST FOR ADMISSION NO. 21: Please admit that it constitutes unprofessional conduct pursuant to the Ohio Rules of Professional Conduct for Plaintiff to file a frivolous complaint against Defendant.

ANSWER:

REQUEST FOR ADMISSION NO. 22: Please admit that on November 8, 2018, Defendant published onto the worldwide web a false and defamatory statement that Plaintiff had planned to travel to Paraguay to obtain sex reassignment surgery insofar as Plaintiff is mentally ill.

ANSWER:

REQUEST FOR ADMISSION NO. 23: Please admit that on November 11, 2018, Defendant published onto the worldwide web a false and defamatory statement that Plaintiff was engaged in adultery by having sex with people other than Plaintiff's wife.

ANSWER:

REQUEST FOR ADMISSION NO. 24: Please admit that all of Defendant's publications about Plaintiff—as described within Plaintiff's Complaint—were published by Defendant to third-parties.

ANSWER:

REQUEST FOR ADMISSION NO. 25: Please admit that Defendant is liable to Plaintiff for defamation for the reasons articulated in Paragraphs 26 through 33 of Plaintiff's Complaint.

ANSWER:

REQUEST FOR ADMISSION NO. 26: Please admit that Defendant is liable to Plaintiff for invasion of privacy—false light—for the reasons articulated in Paragraphs 34 through 40 of Plaintiff's Complaint.

ANSWER:

REQUEST FOR ADMISSION NO. 27: Please admit that Defendant is liable to Plaintiff for intentional infliction of emotional distress for the reasons articulated in Paragraphs 41 through 45 of Plaintiff's Complaint.

ANSWER:

REQUEST FOR ADMISSION NO. 28: Please admit Plaintiff is entitled to an award against Defendant in the form of punitive damages for the reasons articulated in Paragraphs 46 through 51 of Plaintiff's Complaint.

ANSWER:

REQUEST FOR ADMISSION NO. 29: Please admit Plaintiff is entitled to permanent injunctive relief against Defendant for the reasons articulated in Paragraphs 52 through 58 of Plaintiff's Complaint.

ANSWER:

REQUEST FOR ADMISSION NO. 30: 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. 31: 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. 32: 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. 33: Please admit that for purposes of First Amendment jurisprudence, Plaintiff is a non-public figure.

ANSWER:

REQUEST FOR ADMISSION NO. 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.

ANSWER:

REQUEST FOR ADMISSION NO. 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.

ANSWER:

REQUEST FOR ADMISSION NO. 36: Please admit to the truth of all allegations, factual and legal, contained within Plaintiff's Complaint.

ANSWER:

REQUEST FOR ADMISSION NO. 37: Please admit that your counterclaim or claims pending against Plaintiff Bryan Anthony Reo, if any, are wholly lacking in merit.

ANSWER:

REQUEST FOR ADMISSION NO. 38: Please admit that your counterclaim or claims pending against Plaintiff Bryan Anthony Reo, if any, are without any evidentiary or factual basis.

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 barratry.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #3: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in vexatious litigation.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #4: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in the crime of stalking.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #5: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has stalked a man for purposes of coercing homosexual sexual conduct from the same.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #6: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has conspired with an Ohio judge to corrupt jury proceedings occurring in June of 2019.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #7: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in the crime of perjury.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #8: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in professional misconduct in the form of Plaintiff filing a frivolous complaint against Defendant.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #9: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff had planned to travel to Paraguay in order to obtain a sex reassignment surgery due to Plaintiff suffering from mental illness.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #10: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in adultery.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #11: 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 #12: 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 #13: 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:

Respectfully submitted,

/S/. BRYAN ANTHONY REO

Bryan Anthony Reo

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

Pro se Plaintiff

Dated: December 19, 2019

CERTIFICATE OF SERVICE

I, Bryan A. Reo, affirm that I am a party to the above-captioned civil action, and on December 19, 2019, I served a true and accurate copy of Plaintiff Bryan Anthony Reo's First Set of Requests for Admissions, Interrogatories, and Requests for Production of Documents 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 December 19, 2019, I electronically emailed to <pastorlindstedt@gmail.com> a PDF version of Plaintiff Bryan Anthony Reo's First Set of Requests for Admissions, Interrogatories, and Requests for Production of Documents to Defendant Martin Lindstedt.

/S/ BRYAN ANTHONY REO
Bryan Anthony Reo
P.O. Box 5100
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(P): (440) 313-5893
(E): Reo@ReoLaw.org
Pro se Plaintiff

Dated: December 19, 2019