

**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)

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Mentor, OH 44061

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Pro se Plaintiff

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

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Pro se Defendant

**PLAINTIFF BRYAN ANTHONY REO’S REPLY IN SUPPORT OF MOTION FOR
PARTIAL RECONSIDERATION OF ORDER**

(ORAL ARGUMENT REQUESTED)

NOW COMES Bryan Anthony Reo (“Plaintiff”), *pro se*, and hereby propounds upon Martin Lindstedt (“Defendant”) and this Honorable Court Plaintiff Bryan Anthony Reo’s Reply in Support of Motion for Partial Reconsideration of Order:

1. Presently before this Court is Plaintiff’s Motion for Partial Reconsideration (ECF No. 68) filed 3/17/2021, seeking partial reconsideration on this Court’s order of partial summary judgment (ECF No. 44) wherein Defendant was allowed to withdraw certain admissions.

2. On 3/29/2021 in case Bryan Anthony Reo v. Martin Lindstedt, 1:19cv-02589-CAB the Honorable Senior Judge Christopher A. Boyko entered an opinion and order adopting the Magistrate Judge's recommendation regarding summary judgment as to liability, and adopting the Magistrate Judge's alternate recommendation as to damages being established via Requests for Admissions and entered judgment for plaintiff in the amount of \$250,000.00 in general damages and \$500,000.00 in punitive damages. Judge Boyko refused to allow any withdrawal of admissions or construe pleadings to provide a basis for the court to sua sponte withdraw admissions for Defendant. That Opinion and Order is attached. (1:19cv-02589-CAB, ECF No. 92).

3. On 3/30/2021 in case of Stefani Rossi Reo v. Martin Lindstedt, 1:19cv-02786-CAB the Honorable Senior Judge Christopher A. Boyko entered an opinion and order adopting the Magistrate Judge's recommendation regarding summary judgment as to liability, and adopting the Magistrate Judge's alternate recommendation as to damages being established via Requests for Admissions and entered judgment for plaintiff in the amount of \$250,000.00 in general damages and \$250,000.00 in punitive damages. Judge Boyko refused to allow any withdrawal of admissions or construe pleadings to provide a basis for the court to sua sponte withdraw admissions for Defendant. That Opinion and Order is attached. (1:19cv-02786-CAB, ECF No. 48).

4. Because the facts and applicable law in the instant action are virtually identical to the facts and law to be addressed in this case, Plaintiff hereby submits a copy of the Opinions and Orders just issued by Judge Boyko who thoroughly researched, analyzed, and addressed these same legal and factual issues. Those opinions and orders from the Bryan Reo case and the Stefani Rossi Reo case are attached as Exhibit 1 and Exhibit 2 respectively.

5. Plaintiff further submits an exhibit from Defendant's own website wherein Defendant provides commentary as to Plaintiff in Bryan Anthony Reo v. Martin Lindstedt, 1:19cv-02589-

CAB having filed a Sur Reply with the Court to advise that he would be unable to get a third-party expert to testify or even come up with an expert report because of Defendant making posts threatening experts. Defendant has now moved into overtly threatening death against any expert who would consider working with Plaintiff. Defendant posted, on his website, at address [http://www.whitenationalist.org/forum/showthread.php?2199-OI-Niggerlips-\(again\)-v-Lindstedt-19CV001530_Fed-19cv2589&p=22577#post22577](http://www.whitenationalist.org/forum/showthread.php?2199-OI-Niggerlips-(again)-v-Lindstedt-19CV001530_Fed-19cv2589&p=22577#post22577), on 3/17/2020, the following.

“Doc 88: OI' Niggerlips Whines Because No One Who Wants to Live Wants Anythang To Do With Attorney-ZOGboy Bryan Reo.” [attached as Exhibit 3, pgs 12-13]

6. Defendant has carried on in an outrageous fashion and has gone from harassing statements and bad behavior aimed to discourage experts from considering being retained as testifying experts by Plaintiff, to now making overt open threats of death, “no one who wants to live” which are clearly intended to prejudice Plaintiff’s ability to conduct a damage hearing in the instant action.

7. Plaintiff prayerfully requests that this Honorable Court grant reconsideration, disallow the sua sponte withdrawal of admissions, and enter judgment in the amount admitted via the Requests for Admissions. It is simply neither fair nor equitable that Defendant should be allowed to avoid the consequences of not only not participating in discovery [and not providing any evidence as to damages] to Plaintiff but to also threaten with death any third party expert who might have been considering providing expert testimony which would have been useful and possibly even necessary for Plaintiff to establish certain categories of damages and the extent of those damages.

Respectfully submitted,

REO LAW, LLC

/s/ Bryan Anthony Reo
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Pro se Plaintiff

Dated: April 5, 2021

VI. CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on April 5, 2021, I served a true and accurate copy of Plaintiff Bryan Anthony Reo's Reply in Support of Motion for Partial Reconsideration of Order and Plaintiff Bryan Anthony Reo's Brief in Support of His Motion for Partial Reconsideration of Order 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 Village of Mentor, Lake County, State of Ohio.

/s/ Bryan Anthony Reo

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Attorney for Anthony Domenic Reo

Dated: April 5, 2021