

**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.

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 REPLY BRIEF IN SUPPORT OF
PLAINTIFF’S VERIFIED MOTION FOR ORDER COMPELLING DEFENDANT
MARTIN LINDSTEDT TO SHOW CAUSE AS TO WHY HE SHOULD NOT BE HELD
IN INDIRECT CIVIL CONTEMPT OF COURT**

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 Brief in Support of Plaintiff’s Verified For Order Compelling Defendant Martin Lindstedt To Show Cause As To Why He Should Not Be Held In Indirect Civil Contempt Of Court:

It is abundantly clear that Defendant received and understood the Court’s order issued September 28, 2020 requiring him to remove certain content and refrain from publishing any

substantially similar statements. Defendant has elected to disregard and disobey the Court's order. He is quite clearly in contempt.

The Court has noted that civil contempt sanctions are remedial in nature, citing *Hopper v. Plummer*, 887 F.3d 744, 752–53 (6th Cir. 2018). A remedial sanction is one that compensate for injury, damage or costs resulting from a past or continuing contempt of court. In the present situation there is a past and continuing/ongoing contempt of court, it is especially flagrant and blatant, and the Defendant is well-aware of the Court's September 28, 2020 order and his obligations thereunder. More than 150 days have elapsed since the issuance of the injunction. Each of those days of non-compliance represents a day whereby Defendant was able to continue to damage Plaintiff on an ongoing basis.

In light of the Court's declination to entertain the idea of jailing Defendant or defaulting him as a sanction [which would be contrary to remedial measures], and bearing in mind that the injunction was generously granted by this Court to prevent ongoing and future damage to Plaintiff's reputation, it would seem most appropriate that Defendant, due to his flagrant non-compliance, be sanctioned some reasonable amount of money. The sanction would presumably [and ideally] be for every day of non-compliance [retroactive to September 28, 2020], payable to Plaintiff, for the damage his non-compliance has caused, is causing, and will cause, Plaintiff's reputation. Plaintiff respectfully requests that the Court, when deciding an amount, bear in mind that Plaintiff is a licensed attorney in both Ohio and Michigan and that Defendant shows no signs of being willing to stop despite being clearly aware of this Court's unambiguous order from September 28, 2020.

The amount chosen must be sufficient to reasonably compensate Plaintiff for reputational damage and to procure Defendant's compliance with this Court Order. Plaintiff respectfully requests \$1,000.00 [one thousand dollars] per day, for every day of non-compliance, beginning from September, 28, 2020, and continuing until such time that Defendant provides this Court with proof of his compliance with the Order issued by this Court on September 28, 2020.

Respectfully submitted,

REO LAW, LLC

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

Dated: February 23, 2021

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MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(T): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on February 23, 2021, I served a true and accurate copy of Plaintiff Bryan Anthony Reo's Reply Brief in Support of Plaintiff's Verified Motion For Order Compelling Defendant Martin Lindstedt To Show Cause As To Why He Should Not Be Held In Indirect Civil Contempt Of Court and this Certificate of Service 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.

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

Dated: February 23, 2021