

**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. Thomas M. Parker

MOTION FOR LEAVE TO AMEND  
OR SUPPLEMENT COMPLAINTS  
[ALL CASES]

**REO LAW, LLC**

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*Pro se Plaintiff and Counsel*

**MARTIN LINDSTEDT**

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*Pro se Defendant*

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**MOTION FOR LEAVE TO AMEND OR  
SUPPLEMENT COMPLAINTS**

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NOW COMES Bryan Anthony Reo (“Plaintiff”) in 1:19-cv-2589, 1:19-cv-2103, and Counsel for Plaintiffs in 1:19-cv-2786 and 1:19-cv-2615, and hereby propounds upon Martin Lindstedt (“Defendant”) and this Honorable Court Plaintiffs Motion for Leave to Amend or Supplement Complaints.

This motion is made pursuant to Fed. R. Civ. P. 15(a)(2) and seeks leave to amend all complaints in all four cases, specifically to revive Count III, Intentional Infliction of Emotional Distress (in all 4 cases), and Count IV, Permanent Injunction (where applicable).

This Court has issued an order (ECF No. 91) on 11 April 2023 wherein it stated that each case has certain claims pending, with the claims such that no case has Count III (Intentional Infliction of Emotional Distress) pending, and Case 1:19-cv-2589 does not have a pending claim for permanent injunction, nor does case 1:19-cv-2786 have such a claim (permanent injunction) pending any longer.

At the time the Magistrate Judges were issuing reports and recommendations for the granting of summary judgment in cases 1:19-cv-2786, 1:19-cv-2589, and 1:19-cv-2615, with recommendations to deny summary judgment on Count III (Intentional Infliction of Emotional Distress) the Plaintiffs in those cases agreed, in responses to the reports and recommendations, to drop those claims for the sake of judicial economy to streamline the proceedings to conclude the cases without a trial.

The matter of streamlining the proceedings to bring about an expeditious and efficient timely resolution (without a trial) is moot since the 6<sup>th</sup> Circuit in its unpublished opinion appears to proclaim that the Federal Rules of Civil Procedure are to be applied as the Federal Suggestions of Civil Procedure as far as pro se litigants such as Defendant Lindstedt are concerned and that Martin Lindstedt is not obligated to abide by or follow any of the Federal Rules, Local Rules, or other rules for pleading standards, content of his pleadings, rules governing discovery, and that his issuance of death threats and terrorism, including threatening to harass, defame, or even murder third party expert witnesses is an acceptable method of litigating a case to “aid in the presentation on the merits.”

As such, Plaintiffs are no longer willing to have Count III, Intentional Infliction of Emotional Distress, withdrawn, and accordingly request leave to file an amended/supplemental complaint, which will be the exact four complaints as they were at the time Defendant Lindstedt removed them and placed them before this Court. In the alternative, if leave is not granted, Plaintiffs would have to file four new complaints and it would require four new scheduling orders or further consolidation. The easiest and most expeditious solution is to simply grant amendment and allow the revival of those claims.

This request is not made for any improper purpose or any attempt to cause delay, but solely due to the fact that Plaintiffs previously agreed to dismiss Count III (in each respective complaint) as a means to further the case to the ultimate and final conclusion, and that such dismissal is now moot based on the 6<sup>th</sup> Circuit's (thankfully) unique interpretation of the Federal Rules of Civil Procedure, and that Plaintiffs should be permitted to present all of their claims without having to file four new additional cases.

Respectfully submitted,

**REO LAW, LLC**

/s/ Bryan Anthony Reo  
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*Pro se Plaintiff and Counsel*

Dated: June 1, 2023

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MOTION TO CONTINUE CONFERENCE

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**CERTIFICATE OF SERVICE**

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I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on June 1, 2023, 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.

/s/ Bryan Anthony Reo

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*Pro se Plaintiff and Counsel*

Dated: June 1, 2023