

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

STEFANI ROSSI REO,

Plaintiff / Counter-Defendant,

v.

MARTIN LINDSTEDT,

Defendant / Counter-Plaintiff.

Case No. 1:19-CV-02786-CAB

Hon. Christopher A. Boyko

Mag. Thomas M. Parker

*Defendant's Request spouse to
Order Dec 91. Request for
Admission using Boyko No paper*

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MARTIN LINDSTEDT

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Pro se Defendant

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

NOW COMES Stefani Rossi Reo ("Plaintiff"), by and through the undersigned counsel and hereby propounds upon Martin Lindstedt ("Defendant") Plaintiff Stefani Rossi 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 Stefani Rossi Reo and her 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

*Doc 91 Order says
"Admissibility"*

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 is a transgender prostitute.

ANSWER:

Objection. Boyer Red made this lie up.

INTERROGATORY NO. 11: 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: Denied. Bryan Reed says his wife is Brazilian

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: Denied. Pastor Lundstedt observed Mrs Reed jumping up & down in a courthouse & reported it to Bryan Reed public Quora post

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: Denied. Piker-Plaintiff suffered no damages

REQUEST FOR ADMISSION NO. 4: Please admit that throughout June 2019 to October 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had worked as a prostitute and had met her husband Bryan Anthony Reo in the context of prostitution.

ANSWER: Denied. This is a Bryan Reed lie which Reed has admitted in other courts to be a lie.

REQUEST FOR ADMISSION NO. 5: Please admit prostitution is a crime in Ohio.

ANSWER: Objection. Bryan Reed making up a foundation for his lies.

REQUEST FOR ADMISSION NO. 6: Please admit that prostitution is a crime in Missouri.

ANSWER: Objection. Bryan Reed making up a foundation for his lies.

REQUEST FOR ADMISSION NO. 7: Please admit that prostitution is a crime which would result in a finding of inadmissibility for immigration purposes.

Objection: Bryan Reed making up a foundation for his lies.

ANSWER: *Objection*

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

ANSWER: *Objection: How is Pastor Lindstedt to find out one way or another about some thing not alleged*

REQUEST FOR ADMISSION NO. 9: Please admit Plaintiff is a biological female.

ANSWER: *Don't know. Pastor Lindstedt did not look underneath Mrs Neo's tail.*

REQUEST FOR ADMISSION NO. 10: Please admit Plaintiff has never committed any crime of any sort.

ANSWER: *Denied. Being a party to a fraudulent civil lawsuit is criminal.*

REQUEST FOR ADMISSION NO. 11: Please admit that you possess no evidence to support the alleged truth of any of the allegedly defamatory statements that give rise to Plaintiff's complaint in the instant action.

ANSWER: *Denied. NO Fake-Plaintiff defamations happened.*

REQUEST FOR ADMISSION NO. 12: Please admit that you know of no evidence that would support the alleged truth of any of the allegedly defamatory statements that give rise to Plaintiff's complaint in the instant action.

ANSWER: *Denied. NO Fake-Plaintiff defamations occurred other than Fake-Plaintiff defamations against Pastor Lindstedt.*

REQUEST FOR ADMISSION NO. 15: Please admit that Defendant is liable to Plaintiff for defamation for the reasons articulated in Paragraphs 7 through 31 of Plaintiff's Complaint.

ANSWER: *Denied. Fake-Plaintiff signed onto a fraudulent complaint signed up by Bryan Neo.*

REQUEST FOR ADMISSION NO. 16: Please admit that Defendant is liable to Plaintiff for invasion of privacy—false light—for the reasons articulated in Paragraphs 7 through 38 of Plaintiff's Complaint.

ANSWER: *Denied. Fake-Plaintiff was never referred to by name by Pastor Lindstedt.*

REQUEST FOR ADMISSION NO. 17: Please admit that Defendant is liable to Plaintiff for intentional infliction of emotional distress for the reasons articulated in Paragraphs 7 through 43 of Plaintiff's Complaint.

ANSWER: *Denied. Pastor Lindstedt has never ever spoken to Fake-Plaintiff.*

REQUEST FOR ADMISSION NO. 18: Please admit Plaintiff is entitled to permanent injunctive relief against Defendant for the reasons articulated in Paragraphs 44 through 50 of Plaintiff's Complaint.

ANSWER:

Denied. Fake - Plaintiff is not entitled to a gag order.

REQUEST FOR ADMISSION NO. 19: 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:

Denied. Bryan Neo is merely dragging up some lies for Fake - Plaintiff to ~~write~~ sign off on.

REQUEST FOR ADMISSION NO. 20: 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:

Denied. Fake - Plaintiff ^{has no} meritorious claim against Pastor Lindstedt.

REQUEST FOR ADMISSION NO. 21: 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:

Denied. Fake - Plaintiff caused \$500,000 and helped steal Pastor Lindstedt's inheritance.

REQUEST FOR ADMISSION NO. 22: Please admit that for purposes of First Amendment jurisprudence, Plaintiff is a non-public figure.

ANSWER:

Denied. Fake - Plaintiff is used by Bryan Neo who is a public figure and agent provocateur.

REQUEST FOR ADMISSION NO. 23: 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:

Denied. Bryan Neo simply told lies and Plaintiff signed off on them.

REQUEST FOR ADMISSION NO. 24: Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff it would be just and proper for Plaintiff to be awarded \$250,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct.

ANSWER:

Denied. Bryan Neo simply told lies and Fake - Plaintiff signed off on them.

REQUEST FOR ADMISSION NO. 25: Please admit to the truth of all allegations, factual and legal, contained within Plaintiff's Complaint.

ANSWER:

Denied. Fake - Plaintiff merely signed off on Bryan Neo's fake-complaint.

REQUEST FOR ADMISSION NO. 26: Please admit that your counterclaim or claims pending against Plaintiff Stefani Rossi Reo, if any, are wholly lacking in merit.

ANSWER: Denied, Fake - Plaintiff's loss cost Pastor Lundstedt \$500,000 of his inheritance, plus

REQUEST FOR ADMISSION NO. 27: Please admit that your counterclaim or claims pending against Plaintiff Stefani Rossi Reo, if any, are without any evidentiary or factual basis.

ANSWER: Denied, Fake - Plaintiff's \$500,000 judgement which was overturned and she still got Pastor Lundstedt's inheritance.

REQUEST FOR ADMISSION NO. 28: Please admit that you damaged Plaintiff in an amount of \$250,000 in general damages and \$250,000 in punitive damages.

ANSWER: Denied, Pastor Lundstedt caused Fake Plaintiff no harm

REQUEST FOR ADMISSION NO. 29: Please admit that judgment should be entered against you, in favor of Plaintiff Stefani Rossi Reo, in the amount of \$500,000.00 dollars.

ANSWER: Denied, Fake - Plaintiff's litigation cost Pastor Lundstedt \$500,000 already.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Only Request for Admissions

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 prostitution.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #3: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff is not a biological female.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #4: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff does not have a real vagina.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #5: Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has ever committed immigration fraud via entering into a sham marriage.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS #6: 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 #7: 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 #8: 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:

Sincerely,

/S/. BRYAN ANTHONY REO

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Attorney for Plaintiff Stefani Rossi Reo

Dated: May 15, 2020