

Answer Bryan Reo Interrogatories
Using Bryan Reo Paper

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

ANTHONY DOMENIC REO,

Plaintiff,

v.

MARTIN LINDSTEDT.,

Defendant.

Case No. 1:19-cv-02615-JRA

Hon. John R. Adams

Mag. George J. Limbert

Defendant's Response to ONOER
Doc 91. Request For Admissions
using Bryan Reo paper

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

NOW COMES Anthony Domenic Reo ("Plaintiff"), *by and through the undersigned counsel* and hereby propounds upon Martin Lindstedt ("Defendant") Plaintiff Anthony Domenic 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 Anthony Domenic 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

Had no need to answer 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: Objection. Suspect Buyer Neo tortious

INTERROGATORY NO. 2: State and any all facts known to you which evince that Plaintiff had a homosexual incestuous relationship with his own son.

ANSWER: Objection. This is just another Buyer Neo lie which Buyer Neo has denied

INTERROGATORY NO. 3: State and any all facts known to you which evince that Plaintiff committed infidelity against his daughter-in-law Stefani Rossi Reo by having an affair with her husband Bryan Anthony Reo.

ANSWER: *Objection. Another Bryan Reo perverted (ie's).*

INTERROGATORY NO. 4: State and any all facts known to you which evince that Plaintiff has at any time engaged in homosexual conduct with any individual.

ANSWER: *Objection: Never commented on Bryan Reo's fathers sexual acts.*

INTERROGATORY NO. 5: State and any all facts known to you which evince that Plaintiff has at any time engaged in adultery, otherwise known as extramarital sexual relations.

ANSWER: *Objection: Only Bryan Reo has said such stuff.*

INTERROGATORY NO. 6: 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: *Objection: Bryan Reo is an agent provocateur & his father likely as well.*

INTERROGATORY NO. 7: 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: *Objection: No other parties other than Plaintiff & Bryan Reo know answer to Bryan*

INTERROGATORY NO. 8: State the facts—if any—which support Defendant's contention—*Reo* if Defendant has one—that Defendant enjoys one or more affirmative defenses so as to justify or mitigate Defendant's liability to Plaintiff. *Lies*

ANSWER: *Objections. Pastor Lindstedt obviously has no defenses to Bryan Reo lies in a short format.*

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: *Admit. Bryan Reo & perhaps his father live in P.O. Box 5100 Mentor Ohio*

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 *Ohio*

as described within Plaintiff's Complaint would cause Plaintiff to suffer damages in the State of Ohio.

ANSWER: Denied. Defendant never even referred to Bryan Reed's father by name or told Bryan Reed's father about the matter.
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.

REQUEST FOR ADMISSION NO. 4: Please admit that on September 6, 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had used the committed homosexual incest with his own son.

ANSWER: Strongly denied. This is a Bryan Reed lie.

REQUEST FOR ADMISSION NO. 5: Please admit incest is defined by Meriam Webster's as sexual intercourse between persons so closely related that they are forbidden by law to marry also: the statutory crime of engaging in such sexual intercourse.

ANSWER: Objection. Pastor Lindstedt doesn't have any such dictionary.

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

ANSWER: Objection. This is probably a foundation for Bryan Reed's lies.

REQUEST FOR ADMISSION NO. 7: Please admit that incest is a crime in Ohio.

ANSWER: Objection. Even if it was it certainly would not stop Bryan Reed.

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

ANSWER: Denied. Bryan Reed is the one who is yapping about "homosexual incest".

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

ANSWER: Denied. See above, but you have allegedly sponsored a minister - Bryan Reed.

REQUEST FOR ADMISSION NO. 10: Please admit Plaintiff has never engaged in homosexual conduct.

ANSWER: Pastor Lindstedt lacks knowledge as to this matter, so Denied.

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. Plaintiff's Complaint drafted by Bryan Reed is largely lies.

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. Plaintiff's Complaint drafted by Bryan Reed is lies

REQUEST FOR ADMISSION NO. 13: 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: Denied. The Plaintiff here is Bryan Reed's father, not Bryan Reed.

REQUEST FOR ADMISSION NO. 14: Please admit that all of Defendant's publications about Plaintiff—as described within Plaintiff's Complaint—were published by Defendant to third-parties,

ANSWER: Denied. Plaintiff was never mentioned by name on Bryan Nations web page

REQUEST FOR ADMISSION NO. 15: Please admit that Defendant is liable to Plaintiff for defamation for the reasons articulated in Paragraphs 20 through 27 of Plaintiff's Complaint.

ANSWER: Denied. All of this fake-plaintiff's Complaint are lies

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 28 through 34 of Plaintiff's Complaint.

ANSWER: Denied. Fake-Plaintiff is Bryan Reed cats paw

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 35 through 39 of Plaintiff's Complaint.

ANSWER: Denied. Fake-Plaintiff is Bryan Reed cats paw

REQUEST FOR ADMISSION NO. 18: Please admit Plaintiff is entitled to permanent injunctive relief against Defendant for the reasons articulated in Paragraphs 40 through 46 of Plaintiff's Complaint.

ANSWER:

Denied. No legal order needed for Fake-Plaintiff never mentioned by name

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. Fake-Plaintiff suffered NO injuries in this life or another

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 not been injured

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 was used by his son Bryan Neo to steal Pastor Lundquist's inheritance.

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

ANSWER:

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. Fake-Plaintiff suffered NO damages, not even a dollar

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. Fake-Plaintiff is due no punitive damages.

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's Complaint drafted up by his alleged son Bryan Neo one nothing but lies.

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

ANSWER: *Denied. Fake Plaintiff started this*

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

ANSWER: *Denied. Fake Plaintiff has put Pastor
Lindsay out for massive damages*

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. Move lies from Bryan Reo*

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

ANSWER: *Denied. Move damages from Bryan Reo*

End of Requests for Admissions on Bryan Reo paper

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: *The "Documents" being sued over
have been for years on Bryan Nations
web page.*

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 homosexual incest.

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 homosexual conduct of any sort.

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 incest.

ANSWER: