

**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-02589-CAB

Hon. Christopher A. Boyko

Mag. Thomas M. Parker

**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 OPPOSITION  
TO DEFENDANT'S RULE 56 DECLARATION**

---

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiff Bryan Anthony Reo's Opposition to Defendant's Rule 56 Declaration.

On 5/15/2020 the Court entered a scheduling order and opened formal discovery. The same day, 5/15/2020, Plaintiff propounded Requests for Admissions, Interrogatories, and Requests to Produce Documents on Defendant,

Defendant claims he was unable to participate in discovery because he was busy. Defendant never responded to any of Plaintiff's discovery and never propounded any discovery on Plaintiff. Defendant did manage to find the time to file multiple documents that judges throughout Northern District of Ohio have since stricken as offensive and abusive. Defendant found the time to file a barrage of abusive documents in various cases throughout the Northern District of Ohio, South Dakota Circuit Court, and the 11<sup>th</sup> Appellate District of the Ohio Court of Appeals, with most of said documents being stricken.

Defendant found the time to file the following-

- 1- Reply Brief of Appellant [2019-L-073, 2019-L-074, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 5/14/2020. [stricken as abusive]
- 2- Third Amended Appellant Brief [2019-L-073, 2019-L-074, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 6/4/2020 [reluctantly accepted with a caution by the court against further abusive language]
- 3- Motion for Appellate Court to Accept Third Amended Appellant Brief [2019-L-073, 2019-L-074, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 6/22/2020 [denied]
- 4- Reply Brief of Appellant [2019-L-073, 2019-L-074, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 6/23/2020
- 5- Appellee Brief [2019-L-136, 2019-L-137, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 5/20/2020. [stricken as abusive]

- 6- Motion to Strike Appellant's Motion to strike Appellee's Brief [2019-L-136, 2019-L-137, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 6/01/2020. [denied]
- 7- Amended Appellee Brief [2019-L-136, 2019-L-137, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 7/23/2020. [motion to strike pending]
- 8- Appellee's Motion for Appellate Court to Accept Second Amended Appellee's Brief [2019-L-136, 2019-L-137, 11<sup>th</sup> Appellate District- Ohio Court of Appeals] filed 8/12/2020
- 9- Defendant's Report of Refused Rule 26(f) [1:19-cv-02589-CAB, ND Ohio] filed 5/15/2020
- 10- Reply to Motion to dismiss for lack of jurisdiction and alleged failure to state a claim under the 11<sup>th</sup> amendment of state immunity for violating the first 10 amendments Bill of Goods and FR Civ 12b2. [1:19-cv-02589-CAB, ND Ohio] filed 5/22/2020
- 11- Reply in Response to Motion to Dismiss for failure to state a claim [1:19-cv-02589-CAB, ND Ohio] filed 6/16/2020
- 12- Motion to Amend Pleadings to Join Additional Bryan Reo Co-Conspirators [1:19-cv-02589-CAB, ND Ohio] filed 7/1/2020 [Magistrate's report recommends denying this]
- 13- Objection to Report and Recommendation [1:19-cv-02589-CAB, ND Ohio] filed 8/20/2020
- 14- Declaration in Response to Motion for Summary Judgment [1:19-cv-02589-CAB, ND Ohio] filed 8/21/2020

- 15- Reply Brief to Plaintiff Bryan [sic] Reo's Frivolous and Unlawful Motion for Summary Judgment [1:19-cv-02615-JRA, ND Ohio] filed 7/10/2020 [although Defendant captioned it referring to Bryan Reo, it was filed in Anthony Domenic Reo v. Martin Lindstedt]
- 16- Incoherent rant/email with irrelevant attachments sent directly to judge's chambers in Stanley County, South Dakota – [58CIV20-07 South Dakota Circuit Court, Sixth Judicial Circuit] sent 6/4/2020 [appears to have been intended to be objections to the issuance of a preliminary injunction]
- 17- Incoherent rant/email with irrelevant attachments sent directly to judge's chambers in Stanley County, South Dakota – [58CIV20-07 South Dakota Circuit Court, Sixth Judicial Circuit] sent 6/30/2020 [appears to have been intended to be objections to the issuance of a preliminary injunction and a general rant against Plaintiff and the legal system]
- 18- Motion for Dismissal of this Lawless Fraudulent Action by Bryan Reo [58CIV20-07 South Dakota Circuit Court, Sixth Judicial Circuit] filed 7/7/2020 [denied]
- 19- Defendant's Response to This Fraudulent Ex Parte Order Made Without Jurisdiction By This Corrupt Court Demanding Either a Dismissal and Punishment of Attorney Bryan Reo or to Allow Appearance by Telephone by Pastor Lindsted [sic] [20CS000520 Lake County Common Pleas, Ohio] filed 5/26/2020

20- Respondents' Intention to Call in Regarding This Fraudulent Ex Parte Order  
Procedure Made Without Jurisdiction by This Court [20CS000520 Lake  
County Common Pleas, Ohio] filed 5/26/2020

Defendant also found the time to post on his website [www.whitenationalist.org](http://www.whitenationalist.org) and [www.christian-identity.net/forum](http://www.christian-identity.net/forum) where he discusses the ongoing cases at length. From 5/15/2020 [the date of the entry of the scheduling order and the opening of formal discovery] to the date of the filing of this brief, Defendant made 21 posts specifically about case [1:19-cv-02589-CAB, ND Ohio] and 44 posts about the other cases wherein he is a party. Defendant simply didn't have the time participate in discovery because his time wound up allocated to 65 separate posts on his forum about these cases and dozens of abusive frivolous filings in the cases he was posting about.

That Defendant now asks for an extension of discovery after refusing to participate in discovery over the last 95 days is not surprising but the circumstances surrounding his request are such that it is clear he does not deserve the consideration he seeks.

Defendant references his desired amended complaint that he hopes the court will accept, with a half-dozen new parties he seeks to join.

The Magistrate's Report and Recommendation states that leave to amend should be denied and that the parties Defendant wishes to join, not be joined. Defendant's request to extend discovery references four parties that Defendant already joined into this action through an attempted counter-claim which is really a series of third-party complaints, parties that the

Magistrate's Report and Recommendation states should be dismissed. This would leave only Plaintiff and Defendant and Plaintiff propounded a full discovery packet on Defendant on 5/15/2020, the day formal discovery began. Plaintiff was perfectly willing to participate in discovery with Defendant, noting that formal discovery [per the scheduling order] ends 9/1/2020. This case was filed on 9/18/2019 and is close to 12 months old. Plaintiff is not willing to stipulate, consent, or in any way agree to an extension of discovery given the age of this case, the procedural history of this case, the history of Defendant's behavior throughout the proceedings in this case, and the Defendant's complete refusal to participate in discovery throughout this case.

The Defendant claims he was "too busy" to respond to discovery propounded on him by Plaintiff or to serve any of his own discovery and that he now wants to participate in discovery. He never suffered from a shortage of time when it came to filing abusive documents that denigrated the Plaintiff, Plaintiff's father, Plaintiff's wife, Plaintiff's colleagues, Plaintiff's counsel in other actions where Plaintiff is represented by counsel, this Court, the Court of Common Pleas, or the judicial system in general. Defendant had all the time in the world, he simply decided to squander it with his windbag rhetoric and abusive sovereign citizen style filings.

The Court's order on July 23, 2020 stated that if Defendant needed to conduct discovery for purposes of responding to Plaintiff's motion for summary judgment he could make a declaration to that effect. Defendant has not done so. Defendant's declaration rants and raves about enemies, conspiracies, and threatened vengeance, but between the incoherent rambling it is clearly stated, he wants to go after "Reo co-conspirators" he lists as, including but not limited to, South Dakota attorney Robert Konrad and a whole slew of individuals that have nothing to do with the

instant action. Defendant tellingly never once references needing discovery for the purposes of motion practice as to the present pending F.R.C.P. 56 motion that Plaintiff has filed. Implicit in the Court's order of July 23, 2020 was that Defendant should timely file a declaration and it should relate to the present motion for the instant action. Taking 28 days to file a declaration is simply untimely. Defendant was aware that Plaintiff sought to move for summary judgment on 6/22/2020 and the court granted this motion for leave on 7/23/2020, with the motion itself being filed on 7/23/2020. None of the recent motion practice is a surprise or is anything new for Defendant.

Formal discovery, per the Court's scheduling order, closes on 9/1/2020 and the Defendant had plenty of time to participate in discovery, plenty of time to oppose Plaintiff's motion for leave to file a summary judgment motion ahead of the schedule, plenty of time to file a prompt and timely declaration, and plenty of time to oppose Plaintiff's motion. Defendant sure found the time to make 65 posts about these cases on his website forum and he found the time to file dozens of filings in more than a half-dozen different cases.

Defendant does not seek to participate in this case in any meaningful context. He seeks to needlessly delay the proceedings by bogging the case down with joinder of a dozen new third parties through third party complaints despite the court having set a date of 7/1/2020 for amending pleadings and joining new parties and despite the Magistrate's Report and Recommendation already recommending the court deny Lindstedt's motion for leave to amend.

What Defendant is asking of the Court would represent at least a 10-12 month delay in the proceedings of this case. Defendant is not entitled to have the proceedings extended because he

chose not to participate in the case and he is not entitled to escape the consequences of Rule 36 and his complete and total failure to participate in discovery which was a decision he made for himself and has now caused him a problem that is one which is entirely of his own making.

Defendant does not deserve to be afforded the opportunity to engage in an additional 10-12 months of vexatious behavior within the instant action in light of everything he has done to date, with the Magistrate even noting- “Thus, permitting Lindstedt to amend his pleading again would be futile and would undoubtedly further delay this case. The pleading phase of this litigation has already proven difficult. Because allowing Lindstedt to further amend his pleading would be futile and would cause further delay, I recommend that the Court DENY Lindstedt’s motion for leave to amend pleadings.” [ECF. No. 52- Magistrate’s Report and Recommendation]

Defendant Lindstedt also continues to strangely join Church of Jesus Christ Christian Aryan Nations of Missouri into the action as a co-defendant despite the fact that Plaintiff never named that entity as a defendant and never pled a claim against that entity, and Defendant Lindstedt is not a licensed attorney in any jurisdiction and is thus once more engaged in unauthorized practice of law on behalf of his corporate entity after being repeatedly warned about the same in this and other courts.

Plaintiff opposes Defendant’s attempt to consolidate different cases that arose from different circumstances, transactions, operative facts, that have different plaintiffs, and involve varied procedural postures. Each case presently has a dispositive motion pending and each case has a different set of operative facts, the only common thread is that the defendant is the same in



each case. It is rather telling that Defendant cites no authority for the proposition that a tortfeasor who wrongs multiple separate individuals in separate transactions, occurrences, with different operative facts, with each wronged person having suffered factually unique injuries specific to each individual plaintiff, should have their cases consolidated on the sole basis that the tortfeasor is the same in each case and believes it more convenient for his own logistics to force his victims to consolidate into one case. It is also rather telling that Defendant cites no authority for the prospect that four cases can be consolidated 10-12 months into the proceedings and that a Defendant should be afforded 10-12 months to finally get around to making such a motion. Plaintiff will further brief this issue if so required.

Dispositive motions are pending in all of the other cases that Defendant references. For instance, the motion for summary judgment in the case Bryan Anthony Reo v Martin Lindstedt presently pending before Judge Solomon Oliver Jr., [1:19-cv-02103-SO] was filed by plaintiff on 1/26/2020 which has been fully briefed as of 2/26/2020 wherein defendant Lindstedt's opposition consists solely of incoherent ranting, noting that discovery ended on 4/30/2020 in that case and at no time did Lindstedt participate in discovery or ever move for an extension or modification of the discovery date which was set in a case management order entered on 12/13/2019.

In Anthony Domenic Reo v Martin Lindstedt presently pending before Judge John R. Adams, [1:19-cv-02615-JRA] a summary judgment motion was filed on 6/12/2020 and was fully briefed as of 7/14/2020 with defendant Lindstedt's only opposition being a brief wherein he said "I answered requests for admissions in a separate case in Missouri involving Bryan Reo around 6 years ago and I don't feel like addressing discovery from Anthony Reo in this present case."

Discovery ended in that case on 8/12/2020 and at no time did Lindstedt participate in discovery or ever move for an extension or modification of the discovery date which was set in a case management order entered on 4/29/2020.

In Stefani Rossi Reo v Martin Lindstedt presently pending before Judge Christopher Boyko, [1:19-cv-02786-CAB] a summary judgment motion was filed on 7/27/2020 and as of the date of the filing of this brief, no opposition has been filed by defendant Lindstedt, nor has leave to plead been requested by defendant Lindstedt. Defendant Lindstedt has filed a declaration which is obviously an attempt to bog down the proceedings, delay the proceedings, derail the procedurally correct and valid granting of summary judgment to plaintiff Stefani Rossi Reo, and further prolong the case when defendant Lindstedt knew since as early as 6/22/2020 that Stefani Rossi Reo was seeking to file for summary judgment and given his experience with requests for admissions combined with his knowledge that he had never participated in discovery nor cooperated with discovery he could have reasonably expected that the basis would be requests for admissions.

In each case, but especially in the two cases before Judge Boyko where the respective plaintiffs sought leave to move for summary judgment, Lindstedt knew what was coming and chose to do nothing except file a variety of garbage and trash in all of the various cases pending against him. He has not made any motions pursuant to the rules that govern discovery and he has not offered any admissible evidence that would demonstrate the existence of a genuine dispute of material fact sufficient to compel the court to decline summary judgment. Lindstedt's declarations make it clear he seeks to engage in abusive third party complaint practice, endless discovery and

motion practice against third parties, and he seeks to continue to try to amend his pleadings to include government actors and other irrelevant third parties. It would be highly prejudicial to the Plaintiff to allow Defendant to delay or prolong these proceedings given that this case is approximately 12 months old [filed in Lake County Common Pleas on 9/18/2019] and the pleadings are not even closed because Rule 12(b) motions remain pending [noting that the Magistrate's Report and Recommendation is to grant those motions]

Defendant's complaint about Rule 26 initial disclosures is without merit. See ECF. No. 28 wherein Plaintiff Reo filed his initial disclosures with the Court and served a copy of same on Defendant Lindstedt.

Plaintiff opposes any attempt by Defendant to extend discovery, further delay the proceedings, or bog down the proceedings with the joinder of additional parties. Plaintiff will further brief this issue if so required. The Court should reject Defendant's attempt to drag this case out for the nearly 4 years he dragged out the 15CV and 16CV cases in Lake County Common Pleas which ultimately were concluded in June 2019 at a jury trial wherein Plaintiff prevailed. Defendant would probably like to drag this case out for 48+ months, but Plaintiff sees no reason for such a thing. It is likely that this case will be concluded on the merits within the next 12 weeks. Plaintiff is optimistic and believes the most plausible outcome of this case is the granting of Plaintiff's pending Rule 56 motion which will resolve all claims and counterclaims.

The Court should reject Defendant's attempt to extend discovery, amend his pleadings, join additional parties, or further delay the proceedings or hinder Plaintiff's due process rights to

seek peaceful redress of grievances. Plaintiff is entitled to summary judgment on all claims and counterclaims.

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: August 24, 2020

**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-02589-CAB

Hon. Christopher A. Boyko

Mag. Thomas M. Parker

**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*

---

**CERTIFICATE OF SERVICE**

---

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on August 24, 2020, 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.

I have also electronically filed the foregoing document which should serve notice of the filing of the same upon each party who has appeared through counsel, via the court's electronic filing notification system.

/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: August 24, 2020