

**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 MOTION FOR LEAVE TO MOVE FOR
SUMMARY JUDGMENT**

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiff Bryan Anthony Reo's Motion for Leave to Move for Summary Judgment. For the reasons that follow this Court should grant Plaintiff Bryan Anthony Reo leave to move for Summary Judgment.

Plaintiff Bryan Anthony Reo has completed all fact discovery, will not be engaging in any expert discovery, and will not be seeking to amend his pleadings to add claims, parties, defenses to counter-claims, or for any purpose. Plaintiff has finished all fact discovery with Defendant and has what is needed for the entire case to be disposed of as to all claims and counter-claims.

On 5/15/2020 Plaintiff propounded discovery upon Defendant Martin Lindstedt in the form of Plaintiff's Interrogatories for Defendant, Plaintiff's Requests for Production, and Plaintiff's Requests for Admissions. Plaintiff is prepared to move for summary judgment as soon as this Court will grant leave. Plaintiff wishes this Court to note that Defendant did not propound one single discovery request upon Plaintiff, no discovery from Defendant to Plaintiff is pending or awaiting a response by Plaintiff, nor has the Defendant stated any intention or anticipation of participating in discovery by propounding discovery upon Plaintiff.

If the Court grants leave, Plaintiff's proposed [and hopefully imminent] motion for summary judgment will be somewhere between 15 and 21 pages, inclusive of the title block, the motion itself, the brief, table of contents, conclusion, signature page, and certificate of service. Exhibits attached will be only those absolutely necessary and will not exceed 15 pages. Plaintiff's motion will comply with the Federal Rules of Civil Procedure, the Local Rules of the Northern District of Ohio, the Standing Order of this Honorable Court, and any other requirements provided and detailed in the Case Management Order.

The entire case, with all claims and counter-claims, is ripe for an efficient and expeditious disposal and the granting of Plaintiff leave to move for summary judgment will provide the basis for effectuating such a resolution.

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: June 22, 2020

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Granby, MO 64844

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(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 June 22, 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.

/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: June 22, 2020