

**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 A. Parker

**THIRD-PARTY DEFENDANT KYLE J. BRISTOW'S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(B)(2) AND FED. R. CIV. P. 12(B)(6)**

(ORAL ARGUMENT NOT REQUESTED)

NOW COMES Kyle J. Bristow ("Bristow"), *pro se*, and hereby propounds upon Bryan Anthony Reo ("Plaintiff"), Martin Lindstedt ("Lindstedt"), and this Honorable Court Third-Party Defendant Kyle J. Bristow's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(2) and Fed. R. Civ. P. 12(B)(6):

1. For the reasons set forth within Third-Party Defendant Kyle J. Bristow's Brief in Support of his Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(2) and Fed. R. Civ. P. 12(B)(6), Bristow lacks minimum contacts with Ohio for the Court to exercise personal jurisdiction over him.

2. For the reasons set forth within Third-Party Defendant Kyle J. Bristow's Brief in Support of his Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(2) and Fed. R. Civ. P. 12(B)(6), Lindstedt's Third-Party Complaint against Bristow fails to state a claim upon which relief can be granted.

WHEREFORE, Bristow prays that this Honorable Court will:

- A. Dismiss without prejudice Lindstedt's third-party claims against Bristow on the basis that the Court lacks personal jurisdiction over Bristow and/or dismiss with prejudice Lindstedt's third-party claims against Bristow on the basis that they fail to state a claim upon which relief can be granted.

Respectfully submitted,

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Pro se Third-Party Defendant

Dated: March 17, 2020

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v.

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Case No. 1:19-cv-02589-CAB

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**THIRD-PARTY DEFENDANT KYLE J. BRISTOW'S BRIEF IN SUPPORT OF HIS
MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(2) AND FED. R. CIV. P.
12(B)(6)**

(ORAL ARGUMENT NOT REQUESTED)

TABLE OF CONTENTS

I. INDEX OF AUTHORITIES 2

II. CONCISE STATEMENT OF ISSUES PRESENTED..... 4

III. STATEMENT OF FACTS 5

IV. LAW & ARGUMENT 7

 A. LINDSTEDT’S CLAIMS AGAINST BRISTOW MUST BE DISMISSED
 PURSUANT TO FED. R. CIV. P. 12(B)(2).....7

 1. STANDARD OF REVIEW 7

 2. PRINCIPAL POINT OF ARGUMENT 8

 B. LINDSTEDT’S CLAIMS AGAINST BRISTOW MUST BE DISMISSED
 PURSUANT TO FED. R. CIV. P. 12(B)(6).....11

 1. STANDARD OF REVIEW 11

 2. PRINCIPAL POINT OF ARGUMENT 12

V. CONCLUSION..... 13

I. INDEX OF AUTHORITIES

CASE LAW

<i>Air Prod. & Controls, Inc. v. Safetech, Int'l, Inc.</i> , 503 F.3d 544 (6 th Cir. 2007).....	7
<i>Ashcroft v. Iqbal</i> , 556 U.S. 662 (2009).....	11
<i>Bell A. Corp. v. Twombly</i> , 550 U.S. 544 (2007)	11
<i>Beydoun v. Wataniya Restaurants Holding, Q.S.C.</i> , 768 F.3d 499 (6 th Cir. 2014).....	11
<i>Binion v. O'Neal</i> , 95 F.Supp.3d 1055 (E.D. Mich. 2015).....	7, 10
<i>Burger King v. Rudzewicz</i> , 471 U.S. 462 (1985).....	10
<i>CompuServe, Inc. v. Patterson</i> , 89 F.3d 1257 (6 th Cir. 1996).....	10
<i>Conn v. Zakharov</i> , 667 F.3d 705 (6 th Cir. 2012).....	8
<i>Dean v. Motel 6 Operating, L.P.</i> , 134 F.3d 1269 (6 th Cir. 1998).....	7
<i>Estate of Thompson</i> , 545 F.3d 357 (6 th Cir. 2008).....	8
<i>Intera Corp. v. Henderson</i> , 428 F.3d 605 (6 th Cir. 2005)	10
<i>J. McIntyre Mach., Ltd. v. Nicastro</i> , 131 S.Ct. 2780 (2011)	10
<i>Lambert v. Hartman</i> , 517 F.3d 433 (6 th Cir. 2008).....	11
<i>Machine Co. v. Mohasco Industries, Inc.</i> , 401 F.2d 374 (6 th Cir. 1968)	10
<i>Miller v. AXA Winterthur Ins. Co.</i> , 694 F.3d 675 (6 th Cir. 2012)	7
<i>Nationwide Mut. Ins. Co. v. Tryg Int'l. Ins. Co.</i> , 91 F.3d 790 (6 th Cir. 1996)	7
<i>Neogen Corp. v. Neo Gen Screening, Inc.</i> , 282 F.3d 883 (6 th Cir. 2002).....	7, 10
<i>Schneider v. Hardesty</i> , 699 F.3d 693 (6 th Cir. 2012).....	8
<i>Theunissen v. Matthews</i> , 935 F.2d 1454 (6 th Cir. 1991)	7

STATUTORY LAW

O.R.C. § 2307.382	8
-------------------------	---

CONSTITUTIONAL LAW

Fourteenth Amendment to the United States Constitution8, 10

COURT RULES

Fed. R. Civ. P. 12(b)(2).....4, 6-7, 13

Fed. R. Civ. P. 12(b)(6).....4, 5, 7, 11, 13

Fed. R. Civ. P. 12(g)(1).....7

II. CONCISE STATEMENT OF ISSUES PRESENTED

1. Whether the Court should dismiss without prejudice the claims of Martin Lindstedt (“Lindstedt”) against Third-Party Defendant Kyle J. Bristow (“Bristow”) pursuant to Fed. R. Civ. P. 12(b)(2) on the basis that the Court lacks personal jurisdiction over Bristow.

Lindstedt’s Presumed Response: “No.”

Bristow’s Response: “Yes.”

2. Whether the Court should dismiss with prejudice the claims of Lindstedt against Bristow pursuant to Fed. R. Civ. P. 12(b)(6) on the basis that Lindstedt has failed to state a claim upon which relief can be granted.

Lindstedt’s Presumed Response: “No.”

Bristow’s Response: “Yes.”

III. STATEMENT OF FACTS

Lindstedt is a white supremacist who resides in Granby, Missouri, and whose claim to fame—other than being a noxiously vile white supremacist who vexatiously files frivolous pleadings against his innocent victims to waste their time and offend judicial economy—is that he was previously on the receiving end of a criminal indictment for first degree statutory sodomy with a child under the age of twelve years. (Exhibit A – News Article).

On February 3, 2020, Lindstedt filed a pleading with the Court which alleges third-party claims against Bristow. (ECF No. 17). On March 13, 2020, the Clerk sent Summons concerning the same to Bristow. (ECF No. 23, PageID. # 201-202).

In Lindstedt’s pleading, Lindstedt prays that the Court will disbar Bristow for being what Lindstedt describes as an “agent provocateur” who previously served as the chairman of a non-profit corporation called the Foundation for the Marketplace of Ideas, Inc. (ECF No. 17, PageID. ## 129-130, 133-134). Lindstedt also whines that Bristow represented a party in a completely unrelated case in the United States District Court for the Southern District of Ohio. (ECF No. 17, PageID. ## 133, 148-150). Lindstedt’s pleading is fairly characterized as being unintelligible.

Lindstedt appears to be filing third-party claims against Bristow for common law defamation, false light, and intentional infliction of emotional distress. (ECF No. 17, PageID. ## 156-159). However, the claims are conclusory in nature, are not supported with averments of fact, and are subject to dismissal pursuant to Fed. R. Civ. P. 12(b)(6).

Bristow is a licensed Michigan and Ohio attorney who resides in Michigan and maintains his law office in Michigan. (Exhibit B – Declaration of Attorney Kyle J. Bristow). Although Bristow is a licensed Ohio attorney, Bristow does not have any active cases pending in Ohio. (Exhibit B – Declaration of Attorney Kyle J. Bristow). Bristow maintains that the Court lacks

personal jurisdiction over Bristow and that Lindstedt's claims against Bristow should be dismissed without prejudice pursuant to Fed. R. Civ. P. 12(B)(2). (Exhibit B – Declaration of Attorney Kyle J. Bristow).

IV. LAW & ARGUMENT

A motion to dismiss per Fed. R. Civ. P. 12(b)(2) may be joined by a motion to dismiss per Fed. R. Civ. P. 12(b)(6). Fed. R. Civ. P. 12(g)(1).

A. LINDSTEDT'S CLAIMS AGAINST BRISTOW MUST BE DISMISSED PURSUANT TO FED. R. CIV. P. 12(B)(2)

1. STANDARD OF REVIEW

As was succinctly articulated in *Binion v. O'Neal*, 95 F.Supp.3d 1055 (E.D. Mich. 2015), concerning the standard of review for a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(2):

A motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(2) tests the court's personal jurisdiction over the defendant. The plaintiff bears the burden of establishing that personal jurisdiction exists. *Neogen Corp. v. Neo Gen Screening, Inc.*, 282 F.3d 883, 887 (6th Cir. 2002). The Sixth Circuit has clearly outlined the procedure for determining personal jurisdiction in Fed.R.Civ.P. 12(b)(2) challenges. *Dean v. Motel 6 Operating, L.P.*, 134 F.3d 1269, 1271-72 (6th Cir. 1998). When considering a motion under Rule 12(b)(2), a court has three choices: (1) rule on the motion based on the affidavits submitted by the parties, (2) permit discovery in aid of the motion, or (3) conduct an evidentiary hearing on the merits of the motion. *See Dean*, 134 F.3d at 1272. When a court rules on a 12(b)(2) motion to dismiss without an evidentiary hearing, the complaint and affidavits are considered in a light most favorable to the plaintiff. *Id.*

Binion, 95 F.Supp.3d at 1058. See also *Air Prod. & Controls, Inc. v. Safetech, Int'l, Inc.*, 503 F.3d 544, 549 (6th Cir. 2007).

“In diversity cases, federal courts apply the law of the forum state to determine whether personal jurisdiction exists.” *Miller v. AXA Winterthur Ins. Co.*, 694 F.3d 675, 678 (6th Cir. 2012) (quoting *Nationwide Mut. Ins. Co. v. Tryg Int'l. Ins. Co.*, 91 F.3d 790, 793 (6th Cir. 1996)). “In response to a motion to dismiss, the plaintiff may not stand on his pleadings, but must show the specific facts demonstrating that the court has jurisdiction.” *Miller*, 694 F.3d at 678 (citing *Theunissen v. Matthews*, 935 F.2d 1454, 1458 (6th Cir. 1991)).

2. PRINCIPAL POINT OF ARGUMENT

The Court does not enjoy personal jurisdiction over Bristow, who is a resident and domiciliary of Michigan and who lacks minimum contacts with Ohio sufficient for the Court to enjoy long-arm jurisdiction over him. (Exhibit B – Declaration of Attorney Kyle J. Bristow).

Ohio’s jurisdictional “long-arm” statute is “not coterminous with federal constitutional limits. Thus, ‘to establish a prima facie case of personal jurisdiction, a plaintiff must demonstrate that (1) Ohio’s long-arm statute has been satisfied and (2) exercising jurisdiction would comport with the Due Process Clause of the Fourteenth Amendment.’” *Schneider v. Hardesty*, 699 F.3d 693, 700 (6th Cir. 2012) (quoting *Estate of Thompson*, 545 F.3d 357, 361 (6th Cir. 2008)).

Under Ohio law, “a court may exercise personal jurisdiction over a non-resident only if specific jurisdiction can be found under one of the enumerated bases in Ohio’s long-arm statute.” *Conn v. Zakharov*, 667 F.3d 705, 717-18 (6th Cir. 2012). Ohio’s long-arm statute is O.R.C. § 2307.382, which states:

- (A) A court may exercise personal jurisdiction over a person who acts directly or by an agent, as to a cause of action arising from the person's:
 - (1) Transacting any business in this state;
 - (2) Contracting to supply services or goods in this state;
 - (3) Causing tortious injury by an act or omission in this state;
 - (4) Causing tortious injury in this state by an act or omission outside this state if he regularly does or solicits business, or engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumed or services rendered in this state;
 - (5) Causing injury in this state to any person by breach of warranty expressly or impliedly made in the sale of goods outside this state when he might reasonably have expected such person to use, consume, or be affected by the goods in this state, provided that he also regularly does or solicits business, or

engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumed or services rendered in this state;

- (6) Causing tortious injury in this state to any person by an act outside this state committed with the purpose of injuring persons, when he might reasonably have expected that some person would be injured thereby in this state;
- (7) Causing tortious injury to any person by a criminal act, any element of which takes place in this state, which he commits or in the commission of which he is guilty of complicity.
- (8) Having an interest in, using, or possessing real property in this state;
- (9) Contracting to insure any person, property, or risk located within this state at the time of contracting.

* * *

- (C) When jurisdiction over a person is based solely upon this section, only a cause of action arising from acts enumerated in this section may be asserted against him.

In the instant case, not a single basis under Ohio's long-arm statute exists for the Court to be permitted to exercise jurisdiction over Bristow; to wit: (1) Bristow does not transact business in Ohio which is related to Lindstedt's causes of action against Bristow; (2) Bristow did not contract to supply services or goods to Lindstedt which give rise to Lindstedt's claims against Bristow; (3) Bristow did not cause tortious injury to Lindstedt while Bristow was in Ohio; (4) Bristow does not regularly engage in or solicit business in Ohio; (5) Bristow did not breach a warranty made by Bristow to Lindstedt; (6) Bristow did not engage in misconduct that was committed with the purpose of injuring Lindstedt in Ohio; (7) Bristow did not engage in a conspiracy concerning Ohio; (8) Bristow does not have real property in Ohio; and (8) Bristow did not enter into an insurance contract of any kind in Ohio.

Notwithstanding Ohio's long-arm statute not affording the Court personal jurisdiction over Bristow, the Court also lacks personal jurisdiction over Bristow due to the Due Process Clause of the Fourteenth Amendment to the United States Constitution. As was articulated about this in *Binion*,

“A federal court's exercise of personal jurisdiction in a diversity of citizenship case must be both (1) authorized by the law of the state in which it sits, and (2) in accordance with the Due Process Clause of the Fourteenth Amendment.” *Neogen Corp.*, 282 F.3d at 888 (citation omitted).

* * *

The court's jurisdiction comports with due process “when defendant has sufficient minimum contacts such that traditional notions of fair play and substantial justice are not offended.” *Intera Corp. v. Henderson*, 428 F.3d 605, 615 (6th Cir. 2005). The Sixth Circuit uses a three-part test in determining whether, consistent with due process, a court may exercise limited personal jurisdiction: (1) the defendant must purposefully avail himself of the privilege of acting in the forum state or causing a consequence to occur there; (2) the cause of action must arise from the defendant's activities in the forum state; and (3) the defendant's acts or the consequences caused by the defendant must have a substantial enough connection with the forum state to make the exercise of jurisdiction over him reasonable. *So. Machine Co. v. Mohasco Industries, Inc.*, 401 F.2d 374, 381 (6th Cir. 1968). There is an inference that the exercise of jurisdiction is reasonable where the first two elements have been satisfied. *CompuServe, Inc. v. Patterson*, 89 F.3d 1257, 1268 (6th Cir. 1996).

To establish purposeful availment, the defendant must perform some act whereby the defendant purposefully avails himself of the privilege of doing business in the forum state. *Burger King v. Rudzewicz*, 471 U.S. 462, 475, 105 S.Ct. 2174, 85 L.Ed.2d 528 (1985). There must be a substantial connection between the defendant's conduct and the state such that the defendant “should reasonably anticipate being hauled into court there.” *Id.* at 474. As the Supreme Court recently stated, “[t]he principal inquiry in cases of this sort is whether the defendant's activities manifest an intention to submit to the power of a sovereign.” *J. McIntyre Mach., Ltd. v. Nicastro*, 131 S.Ct. 2780, 2783, 180 L.Ed.2d 765 (2011).

Binion, 95 F.Supp.3d at 1059-60.

In the instant case, Bristow does not have sufficient minimum contacts with Ohio such that the traditional notions of fair play and substantial justice would not be offended for Bristow to be sued in Ohio. Bristow lives and works in Michigan, and Bristow has nothing to do with Lindstedt

in Ohio. Simply said, Bristow did not purposefully avail himself of the privilege of acting in Ohio or causing a consequence to occur in Ohio such that Bristow can be sued in Ohio.

In *Beydoun v. Wataniya Restaurants Holding, Q.S.C.*, 768 F.3d 499, 508 (6th Cir. 2014), it was noted that “[T]he Supreme Court has emphasized that only consequences that proximately result from a party’s contacts with a forum state will give rise to jurisdiction.” For the instant case, no such consequences occurred in Ohio.

B. LINDSTEDT’S CLAIMS AGAINST BRISTOW MUST BE DISMISSED PURSUANT TO FED. R. CIV. P. 12(B)(6)

1. STANDARD OF REVIEW

When deciding a motion to dismiss per Fed. R. Civ. P. 12(b)(6), a court must construe the plaintiff’s complaint in the light most favorable to the plaintiff and must accept all the factual allegations contained in the complaint as true. *Lambert v. Hartman*, 517 F.3d 433, 439 (6th Cir. 2008).

In order to survive a motion to dismiss per Fed. R. Civ. P. 12(b)(6), the plaintiff’s complaint need contain only “enough facts to state a claim for relief that is plausible on its face.” *Bell A. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). “Where a complaint pleads facts that are merely consistent with a defendant’s liability, it ‘stops short of the line between possibility and plausibility of entitlement to relief.’” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (citing *Twombly*, 550 U.S. at 557). “Determining whether a complaint states a plausible claim for relief will * * * be a context-specific task that requires the reviewing court to draw on its judicial experience and common sense.” *Iqbal*, 556 U.S. at 679.

2. PRINCIPAL POINT OF ARGUMENT

Lindstedt has not averred any coherent facts to support Lindstedt's contention that Bristow engaged in actionable misconduct. Lindstedt's pleading speaks for itself—and it does not say much. (ECF No. 17).

Lindstedt has not alleged with averments of fact anything Bristow specifically did which gives rise to Lindstedt's third-party claims against Bristow. (ECF No. 17). Lindstedt's conclusory claims against Bristow should thus be dismissed.

V. CONCLUSION

For the reasons set forth herein, either the Court must dismiss Lindstedt's claims against Bristow—pursuant to Fed. R. Civ. P. 12(b)(2)—on the basis that the Court does not enjoy personal jurisdiction over Bristow, or alternatively, the Court must dismiss Lindstedt's claims against Bristow —pursuant to Fed. R. Civ. P. 12(b)(6)—on the basis that Lindstedt's pleading does not aver a cognizable claim against Bristow with averments of fact in support thereof.

Respectfully submitted,

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/s/ Kyle J. Bristow

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Pro se Third-Party Defendant

Dated: March 17, 2020

EXHIBIT A
NEWS ARTICLE



Missouri White Supremacist Charged With Sex Crime

White supremacist Martin Lindstedt, of Granby, Missouri, was arrested by Newton County authorities on May 10, and charged with first degree statutory sodomy, a charge that indicates the victim was under 12 years of age.

For years, Lindstedt, a former truck driver, has been a vocal white supremacist and an adherent of Christian Identity, a racist and anti-Semitic religious sect. Most recently, he had been the Missouri contact for the Church of the Sons of Yahweh, a Louisiana-based Christian Identity group whose leader, Morris Gulett, was arrested in May 2005 for allegedly planning a bank robbery.

Newton County authorities said that Lindstedt's arrest followed an investigation stemming from a report of child abuse. According to documents posted by Lindstedt to his Web site, his four grandchildren were removed from his custody following the report and he was suspected by authorities of having abused them.

Lindstedt said on his Web site that local authorities "and probably the jews and feds," wanted to create false child molestation charges against him, and claimed that he "notified the Resistance to commit some discreet atrocities if necessary for revenge." He told a local prosecuting attorney that he prayed every day that God or Muslims would use biological warfare on the U.S. and

that he himself looked forward "to destroying your families in retaliation for destroying not only my family, but the families of so many others."

In the 1990s, Lindstedt was an early proponent of the anti-government militia movement, operating his "one-man militia group," the 7th Missouri Militia, and publishing an occasional newsletter, "The Modern Militiaman's Gazette," throughout the late 1990s. Over time, Lindstedt became more interested in promoting white supremacy, changing the title of his newsletter to the "Resistance Political Frontline."

Lindstedt achieved most of his notoriety as a perennial candidate for public office. Since 1994, he has run for federal, state, and local offices, on a variety of political party tickets, but has invariably lost, typically with a miniscule percentage of the vote.

EXHIBIT B
DECLARATION OF
ATTORNEY KYLE J. BRISTOW

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Hon. Christopher A. Boyko

Mag. Thomas A. Parker

DECLARATION OF ATTORNEY KYLE J. BRISTOW
PURSUANT TO 28 U.S.C. § 1746

1. I am licensed to practice law in Michigan and Ohio. My Michigan law license number is P77200 and my Ohio law license number is #0089543.
2. In my capacity as an attorney, I currently do not have any active cases pending in Ohio.
3. I reside in St. Clair County, State of Michigan. I am neither a resident nor domiciliary of Ohio.
4. I did not transact any business in Ohio which is related to Martin Lindstedt's third-party claims against me.
5. I did not contract to supply services or goods to Martin Lindstedt in Ohio which give rise to Martin Lindstedt's third-party claims against me.
6. I did not cause tortious injury to Martin Lindstedt while I was in Ohio.
7. I do not regularly engage in or solicit business in Ohio which gives rise to Martin Lindstedt's third-party claims against me.
8. I did not breach a warranty concerning Martin Lindstedt.
9. I did not engage in misconduct that was committed with the purpose of injuring Martin Lindstedt in Ohio.
10. I did not engage in an actionable conspiracy in which I purposefully directed my conduct to Ohio.

11. I do not own real property in Ohio.
12. I did not enter into an insurance contract of any kind in Ohio which gives rise to Martin Lindstedt's third-party claims against me.
13. I declare under the penalty of perjury that the foregoing is true and correct. Executed on March 17, 2020.

/s/ Kyle J. Bristow
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Pro se Third-Party Defendant

CERTIFICATE OF SERVICE

I, Kyle J. Bristow, affirm that I am a *pro se* party of the above-captioned civil action, and on March 17, 2020, I electronically filed this document with the Clerk of the Court by using the Court's Electronic Filing System, which should serve notification of said filing to all attorneys of record who are registered to receive such electronic service.

Furthermore, I affirm that on March 17, 2020, I place a true and accurate copy of this document in the United States Mail located in City of Mt. Clemens, Macomb County, State of Michigan, which was addressed to Martin Lindstedt, 338 Rabbit Track Road, Granby, MO 64844.

/s/ Kyle J. Bristow
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Dated: March 17, 2020