

**STATE OF OHIO
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY
CIVIL DIVISION**

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Hon. Richard L. Collins

PLAINTIFF'S ANSWER
TO DEFENDANT'S FIRST SET OF
INTERROGATORIES

BRYAN ANTHONY REO

7143 Rippling Brook Lane

Mentor, OH 44060

(P): (440) 313-5893

(E) roodeplaat1983@gmail.com

Pro se Plaintiff

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(P): (417) 472-6901

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Pro se Defendant

PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Ohio Rules of Civil Procedure, Plaintiff Bryan Anthony Reo answers "DEFENDANT'S FIRST SET OF INTERROGATORIES PROPOUNDED UPON PLAINTIFF / LEAD CONSPIRATOR COUNTER-DEFENDANT BRYAN REO" as follows:

- 1) For each and every request for admission for you did not provide an unequivocal admission in the affirmative, provide all facts and legal authorities that support your response.

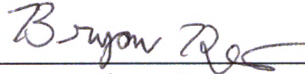
Answer: Objection- this interrogatory is overbroad, not limited in scope, and unduly burdensome, and seeks information protected from disclosure by the work product doctrine and by confidential settlement agreements. Plaintiff further objects to this interrogatory because it exceeds the permissible scope of Civ.R. 26(b). See, e.g., *Brady v. Grendene USA, Inc.*, S.D.Cal. No. 12cv604-GPC, 2014 WL 4925578 *6 (Sept. 26, 2014)

(seeking legal bases exceeds the permissible scope of Rule 26(b). A proper contention interrogatory seeks the facts that support a party's contention, not the legal bases), citing *S. ex rel O'Connell v. Chapman Univ.*, 245 F.R.D. 646, 649 (C.D.Cal.2007).

- 2) Please list all documentary evidence in your possession that supports any and all of the facts in your proceeding answer to the previous interrogatory.

Answer: Objection- this interrogatory violates Civ.R. 33(A)'s forty interrogatory limit.

Respectfully submitted,



Bryan Anthony Reo
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Pro se Plaintiff

Certificate of Service

I, Bryan Anthony Reo, do hereby certify that a true and genuine copy of this motion/brief/filing has been dispatched by United States regular mail, postage prepaid to the Defendant at:

Martin Lindstedt
338 Rabbit Track Road
Granby, Missouri 64844

On this 14 day of January, 2016

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