

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

ORAL ARGUMENT REQUESTED

KLIMKOWSKY LAW, LLC

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Pro se Defendant

**PLAINTIFF'S REPLY BRIEF IN SUPPORT OF MOTION TO
EXCLUDE AND DISQUALIFY DEFENDANT FROM TESTIFYING**

NOW COMES Bryan Anthony Reo ("Plaintiff"), by and through the undersigned attorney, and hereby propounds upon this Honorable Court and Martin Lindstedt ("Defendant") Plaintiff's Reply Brief in Support of Motion to Exclude and Disqualify Defendant From Testifying.

Defendant is of an unsound mind and he is not competent to testify because he does not appreciate reality, nor the need to tell the truth, nor the need to comply with the law. Defendant's recent motion/brief/etc. is essentially a document supporting all of Plaintiff's concerns about Defendant's unsound mind.

Defendant recently filed a rambling incoherent screed that further evinces an unsound mind where Defendant appears to ask for all sorts of bogus sanctions against Plaintiff. Plaintiff's

Counsel, Plaintiff's employer, and Plaintiff's father, as well as other non-parties. ("Defendant's Rant")

Plaintiff filed a meritorious motion based on serious and legitimate concerns that Defendant is of an unsound mind. Defendant Lindstedt attempted to grant himself a default judgment and issued "letters of marque and reprisal" against Lake County Court of Common Pleas on 8/15/2016 in his "Notice of Default Judgment & Crusade & Letters of Marque and Reprisal" where he ordered this Court to cease operations and prepare to enter into three generations of slavery. Only an individual of unsound mind would file such nonsense with a court of law. On that note, at what point does Defendant Lindstedt get defaulted as a sanction for his ceaseless and flagrant disregard for the Rules of Civil Procedure with his frivolous and abusive filings?

Defendant refers to Plaintiff as "a shit-skinned, slant-eyed, negro-lipped homosexual mongrel." (Defendant's Rant pg. 3)

No party hoping to prevail in a civil action would put such nonsense in a motion for filing with the court. Only a delusional and insane individual would write such nonsense and file it with a court while still claiming an intent to win in the action.

Defendant admits he was institutionalized in the "Fulton State Nuthouse" for child molestation. (Defendant's Rant pg. 8)

Defendant states he intends to argue on behalf of, advocate for, and defend himself (permissible), his church (impermissible), and his domestic partner (impermissible). Lindstedt was already warned on several separate occasions that he may not engage in the unauthorized practice of law on behalf of Defendant Church [which is defaulted anyway] or Defendant Fausanught. (Defendant's Rant pg. 9)

Defendant claims Plaintiff is a "mongrel homosexual" and then rants about "jews like Mike 'the kike' Penovich" and other individuals unknown to Plaintiff. (Defendant's Rant pg. 2)

Defendant discusses how he was indicted and on trial for "kissing the penis and buttocks" of his "retarded grandson." (Defendant's Rant Pg. 8)

Defendant, despite having been repeatedly told that he cannot advocate on behalf of any party other than himself, again declares his intentions to advocate and argue on behalf of his defaulted Church of Jesus Christ Christian Aryan Nations of Missouri "church" and his domestic partner Roxie Fausnaught. (Defendant's Rant Pg. 9)

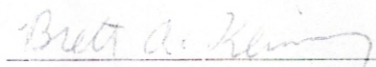
Defendant seems unable to process information as it comes to his knowledge. When the Court informs him that he is not going to advocate on the behalf of others he seems unable to comprehend what that means and what it entails.

CONCLUSION

For the reasons set forth herein, this Honorable Court should grant Plaintiff's Motion to Exclude and Disqualify Defendant From Testifying. Plaintiff also prays that 1) Lindstedt be sanctioned with a *default* for relentlessly submitting obscene court filings and filings on behalf of his co-defendants despite having been told on at least 4 separate occasions that it was not acceptable for him to engage in such conduct, or 2) Lindstedt be excluded from testifying, or 3) Lindstedt be ordered to show cause as to why he should not have to submit to psychiatric review to prove his competency to testify.

Respectfully submitted.

KLIMKOWSKY LAW, LLC


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Certificate of Service

I, Brett Klimkowsky, do hereby certify that a true and genuine copy of Plaintiff's Reply Brief in Support of Motion to Exclude and Disqualify Defendant From Testifying 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 17th day of June, 2017

X

Brett A. Klimkowsky