

IN THE COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO

ENTERED

MAY 13 2025

EDGAR T. RAGOUZIS AKA  
EDGAR THOMAS RAGOUZIS,  
et. al.,

Plaintiffs,

vs.

THE MADISON HOUSE  
CONDOMINIUM OWNERS  
ASSOCIATION, INC. et. al.,

Defendants.

: Case No. A2204283  
:  
: Judge Robert A. Goering  
:  
: ENTRY DECLARING EDGAR  
: RAGOUZIS A VEXATIOUS  
: LITIGATOR



This matter came before the Court on Counterclaim Plaintiff's motion for partial summary judgment to declare Edgar T. Ragouzis Aka Edgar Thomas Ragouzis, ("Mr. Ragouzis") a vexatious litigator pursuant to R.C. 2323.52, and Mr. Ragouzis' response. The Court has reviewed the arguments of the parties made at the evidentiary hearing, memoranda, the record, and the laws of Ohio. Being duly and sufficiently advised, the Court decides as follows:

**I. Facts**

In 2022, Mr. Ragouzis and other residents/unit owners filed a 22-count Complaint claiming The Madison House Condominium Owners' Association, Inc., (the "Association") *et. al.* failed to fulfill their obligations. The Association filed a counterclaim against Mr. Ragouzis alleging he interfered with the Association's performance of maintenance.

On September 5, 2024, Judge Jenkins entered a Decision and Entry Finding Plaintiff Edgar Ragouzis in Contempt of the Court's July 30, 2024 Order and Dismissing His Claims with Prejudice. In this Order, the Court "found by clear and convincing

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evidence that Mr. Ragouzis was in contempt of the Court's orders and reserved ruling on the applicable remedy." Further, "the Court finds that the appropriate remedy for Mr. Ragouzis egregious and outrageous behavior is dismissal of his claims with prejudice." On February 27, 2025, Judge Jenkins voluntarily recused himself from the case. This case was then assigned to this Court.

Throughout this proceeding, Mr. Ragouzis has proceeded *pro se*. In Ohio, "a pro se litigant is presumed to have knowledge of the law and correct legal procedures so that he remains subject to the same rules and procedures to which represented litigants are bound. He is not given greater rights than represented parties, and must bear the consequences of his mistakes."<sup>1</sup> Accordingly, "[u]nder Ohio law, *pro se* litigants are held to the same standard as all other litigants."<sup>2</sup>

## II. Summary Judgment Standard

Pursuant to Ohio Rule of Civil Procedure 56, summary judgment is proper when "(1) [n]o genuine issue as to any material fact remains to be litigated; (2) the moving party is entitled to judgment as a matter of law; and (3) it appears from the evidence that reasonable minds can come to but one conclusion, and viewing such evidence most strongly in favor of the party against whom the motion for summary judgment is made, that conclusion is adverse to that party."<sup>3</sup>

Trial courts should hesitatingly grant summary judgment, giving the non-moving party all benefits of doubt.<sup>4</sup> Mere assertion by the moving party that the non-moving party has no evidence to prove their case is not sufficient ground for the trial court to

<sup>1</sup> *Robinson v. Lorain Cnty. Printing & Publ. Co.*, 2023-Ohio-3.

<sup>2</sup> *Bikkani v. Lee*, 8th Dist. Cuyahoga No. 89312, 2008-Ohio-3130, ¶ 29, citing *Kilroy v. B.H. Lakeshore Co.*, 111 Ohio App.3d 357, 363, 676 N.E.2d 171 (8th Dist.1996).

<sup>3</sup> *Welco Indus., Inc. v. Applied Cos.*, 67 Ohio St. 3d 344, 346, 617 N.E.2d 1129, 1132 (1993) (quoting *Temple v. Wean United, Inc.*, 50 Ohio St.2d 317, 327, 364 N.E.2d 267, 274 (1977)).

<sup>4</sup> *Id.* (citing *Murphy v. Reynoldsburg*, 65 Ohio St.3d 356, 604 N.E.2d 138 (1992)).



grant summary judgment.<sup>5</sup> However, if the moving party fulfills their burden and the non-moving party presents no evidence to support the merits of their case, summary judgment is proper.<sup>6</sup>

### III. Vexatious Litigator

R.C. 2323.25 governs vexatious litigators in the state of Ohio and empowers a court to declare a litigant "vexatious." R.C. 2323.52(A)(3) defines "vexatious litigator" as:

[A]ny person who has habitually, persistently, and without reasonable grounds engaged in vexatious conduct in a civil action or actions, whether in the court of claims or in a court of appeals, court of common pleas, municipal court, or county court, whether the person or another person instituted the civil action or actions, and whether the vexatious conduct was against the same party or against different parties in the civil action or actions.

There is a two-pronged test before a trial court may declare someone a vexatious litigator. First, the person must have "engaged in vexatious conduct in a civil action or actions." And second, the vexatious conduct must have been "habitual[], persistent[], and without reasonable grounds."<sup>7</sup>

"Vexatious conduct" is "conduct of a party in a civil action" that: (a) "obviously serves merely to harass or maliciously injure another party to the civil action"; (b) "is not warranted under existing law and cannot be supported by a good faith argument for an extension, modification, or reversal of existing law"; or (c) "is imposed solely for delay."<sup>8</sup>

Moreover, the First District Court of Appeals has determined these elements must be established by clear and convincing evidence.<sup>9</sup> Additionally, "the vexatious litigator designation is an extraordinary remedy that should be applied in very limited

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<sup>5</sup> *Dresher v. Burt*, 75 Ohio St.3d 280, 1996-Ohio-107, 662 N.E.2d 264 (1996).

<sup>6</sup> *Welco Indus.*, 67 Ohio St. 3d at 346, 617 N.E.2d at 1132 (citing *Wing v. Anchor Media, Ltd. of Texas*, 59 Ohio St.3d 108, 570 N.E.2d 1095, paragraph three of the syllabus (1991)).

<sup>7</sup> *City of Madeira v. Oppenheimer*, 2021-Ohio-2958, P7.

<sup>8</sup> *Id.* at P10, R.C. 2323.52(A)(2).

<sup>9</sup> *Id.* at P8.



circumstances, on clear and convincing evidence that a pro se litigant persistently and habitually uses the legal process solely to harass another party or delay an ultimate resolution in the legal proceeding.”<sup>10</sup>

Counsel argues that granting partial summary judgment in favor of Counterclaim Plaintiffs is justified by Mr. Ragouzis’ (1) habitual and persistent vexatious conduct throughout this litigation, (2) disregard for the judicial rules of conduct and procedure, and (3) substitution of supportable legal theories and precedent with ad hominem attacks on the Court, the litigants, and litigants’ counsel. The Court agrees.

In the weeks following the filing of Counterclaim Plaintiffs’ motion for partial summary judgment, Mr. Ragouzis’ filings consist of meritless motions: (1) Pro Se Emergency Request to Rehear in Oral Argument the Court’s Contempt Finding and Ruling Punishment Decision Pursuant Hillabrand Contra Quonset; (2) Surreply to Cummins’ Reply in Support for Leave Motion in Opposition filed 12September2024; (3) discovery requests directed to Counterclaim Plaintiff Carol Perkins; (4) Court Err Memorandum and request of plaintiffs for Court dismissal with prejudice of of [sic] all counterclaim Plaintiff Claims (Cummins) against counterclaim defendants, and denial of counterclaim plaintiff 05September2024 motion for leave to oppose as moot.

In Judge Jenkins’ July 30, 2024 Decision and Entry Granting Defendant’s Motion for Preliminary Injunctions Against Plaintiff Edgar T. Ragouzis, AKA Edgar Thomas Ragouzis, the Court entered the following findings of fact:

11. Mr. Ragouzis has repetedly impeded the Association’s easements and interefered with the Association’s contractors and vendors;

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<sup>10</sup> *Lasson v. Coleman*, 2d Dist. Montgomery No. 21983, 2008-Ohio-4140, ¶ 33, *In re T.D.J.*, 2016-Ohio-293, P7.



17. Despite the Court's order, Mr. Ragouzis repeatedly denied the Association and its contract access for the necessary repairs;

21. Also on June 25, 2024, Mr. Ragouzis registered a complaint with the City related to the HVAC piping and gave City inspectors access to the Units to inspect the HVAC piping on June 26, 2024 – the day he told the Association he was unavailable for the repairs;

22. Mr. Ragouzis did not inform the City inspectors that the Association had been attempting to enter his Units and make the HVAC piping repairs for months;

23. After the City's inspection on June 26, 2024, Mr. Ragouzis sent an email to the City, in which he relayed his understanding that the city would be writing orders on the Association for the HVAC piping issue, demanded that he receive the orders by July 17, 2024, and threatened that he could add the City back into this lawsuit if it did not meet his demands;

30. Additionally, Mr. Ragouzis has repeatedly threatened the Association's counsel in this case and its general counsel, saying he will file complaints against them with the Office of Disciplinary Counsel, and other threats;

31. Additionally, Mr. Ragouzis has repeatedly attempted to directly contact the Association's insurer providing its defense in this lawsuit with various demands; and

35. Additionally, Mr. Ragouzis has previously threatened other Condominium residents, including his elderly former next-door-neighbor.<sup>11</sup>

"Whether undertaken in an array of cases or in a single action, the consistent repetition of arguments and legal theories that have been rejected by the court numerous

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<sup>11</sup> Judge Jenkins' July 30, 2024 Decision and Entry Granting Defendant's Motion for Preliminary Injunctions Against Plaintiff Edgar T. Ragouzis, AKA Edgar Thomas Ragouzis.



times can constitute vexatious litigation."<sup>12</sup> Mr. Ragouzis' antics demonstrate persistent, habitual vexatious conduct by continuously and fruitlessly delaying proceedings, filing motions and appeals, which are not supported by any existing law and cannot be supported by any good faith arguments and further obstructing the course of this litigation.

After this case was reassigned to this Court, Mr. Ragouzis continued to file: (1) Motion to strike or void trial court decisions; (2) motion to compel discovery; (3) notice to strike Madison House filing; (4) request for evidentiary hearing and oral argument; (5) Memorandum Contra To Strike Supplemental Filing March 2, 2025 And Request For Evidentiary Hearing & Oral Argument Of Defendants; and (6) Notice To Strike Second Surreply Of Defendant Madison House Filed April 7, 2025 In Re: Judge Jenkins & Supplemental Evidence Request Oral Argument & Evidentiary Hearing. The Court finds these motions are meritless, ultimately designed for harassment. Further, at the evidentiary hearing, Counterclaim Plaintiffs submitted, without objection, the attached list of "Habitual and Persistent Filings."

Additionally, in November of 2024, Mr. Ragouzis blatantly disregarded the Court's August 28, 2024 Order and sent an email to approximately 100 individuals who are parties in this case, bypassing counsel representation. The email stated,

"Many things can happen now.  
I can refile suit against every owner as you have participated in the Cummins class action.  
All owners must understand the facts. The deferred maintenance and what Ragouzis did to make the assoc act.  
I'm not done here.  
Think about what you think is best. Listening to a Stan Chelsey used to be employee may be a v bad strategy. Mr [sic] Cummins is that!  
Time is short, Edgar Ragouzis"<sup>13</sup>

<sup>12</sup> *Prime Equip. Grp.* at ¶ 40. *Davie v. Nationwide Ins. Co. of Am.*, 2017-Ohio-7721, P40.

<sup>13</sup> Counterclaim Plaintiffs' Motion (And Emergency Hearing Request) For An Order Directing Counterclaim Defendant Ragouzis To Show Cause Why He Should Not Be (1) Held In Contempt Of This



#### IV. Explicit Findings

Pursuant to the record and the laws of Ohio, the Court finds there is clear and convincing evidence of continued behavior on the record that satisfies the two-prong test, and Mr. Ragouzis has engaged in vexatious conduct that is malicious and harassing. While there may have been a basis for Mr. Ragouzis' initial Complaint, Mr. Ragouzis has threatened a campaign to weaponize the court system, and to abuse the judicial process. These threats are intended to intimidate and harass Counterclaim Plaintiffs. Further, at the evidentiary hearing, Counterclaim Plaintiff submitted, without objection by Mr. Ragouzis, the attached list, "Mr. Ragouzis Email Correspondence." In these threatening emails, Mr. Ragouzis further threatens the use of legal proceedings to delay or add to costs of litigation.

Being fully advised in this matter, the Court finds overwhelming evidence to support Counterclaim Plaintiff's motion. Therefore, the motion to declare Edgar Ragouzis a vexatious litigator is well-taken and is hereby **GRANTED**.

Accordingly, it is the order of this Court that Edgar T. Ragouzis Aka Edgar Thomas Ragouzis as outlined by R.C. 2323.52(D) shall be prohibited from doing the following without first obtaining the leave of the Hamilton County Court of Common Pleas to proceed: (a) Instituting legal proceedings in the court of claims or in a court of common pleas, municipal court, or county court; (b) Continuing any legal proceedings that the vexatious litigator had instituted in any of the courts specified in division (D)(1)(a) of this section prior to the entry of the order; (c) Making any application, other than an application for leave to proceed under division (F)(1) of this section, in any legal

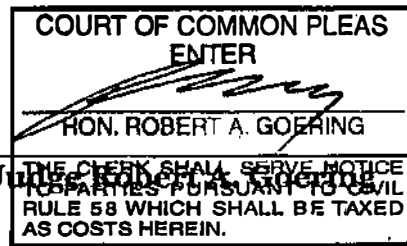


proceedings instituted by the vexatious litigator or another person in any of the courts specified in paragraph (a) of this section.

It is **FURTHER ORDERED** that, pursuant to R.C. 2323.52(H), the clerk of the court shall send a certified copy of this Order to the Clerk of the Supreme Court of Ohio for publication in a manner that the Supreme Court determines is appropriate and that will facilitate the clerk of the court of claims and a clerk of a court of appeals, court of common pleas, municipal court, or county court in refusing to accept pleadings or other papers submitted for filing by Edgar T. Ragouzis Aka Edgar Thomas Ragouzis without first obtaining leave to proceed under this section.

This is a final, appealable order and there is no just cause for delay.

**IT IS SO ORDERED.**



5/12/25  
Date



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### Mr. Ragouzis' Habitual and Persistent Filings

Date	Motion (as titled by Mr. Ragouzis)	Disposition
3/26/24	<i>Motion for Hearing on Attorney Withdrawal Motion Under Local Rule 10(D)</i>	Denied
4/9/24	<i>Notice of Appeal of Entry Denying Plaintiff's Motion for Hearing on Attorney Withdrawal</i>	Dismissed
5/26/24	<i>Motion for Protection Order of Plaintiff's Personal Property From Harmful Damage by Reason of Entry of Defendant and Defendant Contractor Into Plaintiff's Residence</i>	Denied
5/29/24	<i>Motion for Plaintiff Inclusion for Release of All Oyster Documents Without Redaction, Under Agreed Order Entered By This Court on 5-22-2024</i>	Denied
6/27/24	<i>Plaintiff Pro Se Request Extension of Time for Proving Complete Expert Witnesses' Disclosure List</i>	Pending
6/28/24	<i>Request For Continuance Of Status Conference Set By Court On June 26, 2024 For July 02, 2024, Without Prior Consultation With Lead Plaintiff Pro Se Edgar Ragouzis</i>	Denied
7/13/24	<i>Notice Filing By Plaintiff Ragouzis pro se- Correction To Defendant Counsel Barnes' Affidavit And Filings And Request For Oral Argument</i>	Denied
7/13/24	<i>Reply Memo of Edgar T. Ragouzis to Defendants' 5/31/2024 Memo in Opposition</i>	Pending
7/15/24	<i>Nunc Pro Tun (12 July 2024) Filing Corrected Notice of Appeal and Motion to Stay All Proceedings in the Trial Court (Misfiled on 12 July 2024 Under Incorrect Appeals Case No C2400214)</i>	Pending
7/22/24	<i>Plaintiff Ragouzis pro se Request For Extension Of Time To Reply To Motion Of Defendant The Madison House Condominium Owners' Association, Inc. For Preliminary Injunctions Against Edgar Ragouzis, Pro Se, Filed 10 July 2024 And, The Postponement Of Related Hearing On 24 July 2024</i>	Denied
7/23/24	<i>Plaintiff Ragouzis pro se Motion To Stay All Proceedings In The Trial Court Case # A2204283 And Courtesy Appearance At 24 July 2024 Hearing To Resolve Only The HVAC Fix In Plaintiff pro se Units Without An Evidentiary Hearing Which Plaintiff Has Previously Objected To On Time And Notice! The Attached Live Docket Activity In The First District Court Of Appeals Showing A Moving Request At 2 August 2024 Requires The Trial Court To Respect The Appellant pro se Filing And The First District Court Of Appeals Continuation Of The pro se Appeal Case</i>	Denied
7/24/24	<i>Plaintiff Ragouzis pro se Emergency Motion To Compel Discovery Of Previously Requested Building Maintenance Records Specifically As Stated Below</i>	Pending



Date	Motion (as titled by Mr. Ragouzis)	Disposition
7/31/24	<i>Motion Under Civ. R. 52, Specific Findings of Fact &amp; Conclusions of Law on Hearing and Motion of Defendants the Madison House Condominium Owners' Association, Inc. for Preliminary Injunction Against Edgar T. Ragouzis aka Edgar Thomas Ragouzis on July 24, 2024</i>	Pending
8/26/24	<i>Rule 34 Motion to Compel Immediate Production of Materials for Expert Testing</i>	Pending
8/29/24	<i>Plaintiff's Motion To Stay Discovery Or For An Extension Of Time Related To Interest Parties Counterclaimants Counterclaim</i>	Pending
9/16/25	<i>Plaintiff pro se Emergency Request to Rehear in Oral Argument the Court's Contempt Finding and Ruling Punishment Decision Pursuant Hillabrand Contra Quonset</i>	Denied
9/17/24	<i>Plaintiff pro se Request to Amend Notice Time of Defendant Entry Into Plaintiff Home</i>	Denied
9/17/24	<i>Plaintiffs Surreply to Cummins' Reply in Support for Leave Motion in Opposition to Leave filed 12September2024. CUMMINS' COUNTERCLAIMS MUST BE DISMISSED AS A MATTER OF LAW</i>	Pending
9/19/24	<i>Plaintiff Ragouzis pro se Corrected Filing Regarding Discovery Requests from ALL Apposing [sic] Parties and Requested Cummins Dismissal Brought to Plaintiff pro se Ragouzis</i>	Pending
9/20/24	<i>First Set of Request for Admissions, Interrogatories, and Production of Documents Directed to Defendant/Counterclaim Plaintiff Carol Perkins</i>	Stricken
9/20/24	<i>First Set of Request for Admissions, Interrogatories, and Production of Documents Directed to Defendant Witness and Affiant Carol Perkins</i>	Stricken
9/20/24	<i>First Set of Request for Admissions, Interrogatories, and Production of Documents Directed to the Interested Party Defendants and the Cummins Law Firm as Pertains to the Affiant and Witness Carol Perkins on their Behalf</i>	Stricken
9/25/24	<i>Court Err Memorandum and Request of Plaintiffs for Court Dismissal with Prejudice of of [sic] All Counterclaim Plaintiff Claims (Cummins) Against Counterclaim Defendants; and Denial of Counterclaim Plaintiff 05September2024 Motion for Leave to Oppose as Moot</i>	Pending
10/2/24	<i>Notification of Federal Court Action in CASE No. 2:24-cv-00094-DLB-CJS: David L. Budding, Judge related to Plaintiff Helmick</i>	Claim as to Helmick Withdrawn
10/2/24	<i>Motion Request to File Interlocutory Appeal of Decision and Entry of 05September2024 by Judge Jenkins Dismissing Plaintiff Edgar T. Ragouzis' Claims with Prejudice</i>	Denied
10/24/24	<i>Revised Motion for Extension of Time to Reply to Defendants' Response to Motion to Dismiss</i>	Moot



Date	Motion (as titled by Mr. Ragouzis)	Disposition
10/25/24	<i>Notice of Appeal of September 5, 2024 Entry</i>	Pending
10/30/24	<i>Counterclaim Defendant Edgar T. Ragouzis' Sur-Reply Brief in Opposition to Counterclaim Plaintiffs' Reply in Support of Their Motion for Partial Summary Judgment</i>	Pending
11/1/24	<i>Motion for Leave to Serve Discovery on Interested Party Defendant/Counterclaim &amp; Absentee Class Action Member Carol Perkins</i>	Pending
12/6/24	<i>Notice of Edgar T. Ragouzis aka Edgar Thomas Ragouzis Related to Attorney-Client Privilege of Representation of Bertha G. Helmick, Attorney at Law</i>	Pending
12/22/24	<i>Notice of Appeal of November 22, 2024 Entry</i>	Dismissed
12/23/24	<i>Plaintiff Ragouzis Request for Leave of Court to File Sur-Reply to 20 December 2024 Reply of Cummins Interested Party Defendants/Class Action, Counterclaimant Plaintiffs in the Interest of Justice and All Parties</i>	Pending
1/8/25	<i>Praecipe Writ for Personal Service/Foreign Sheriff Service of Subpoena Duces Tecum on Gerald Harley, ALA, 400 Wood Street, Batavia, Clermont County, Ohio 45103</i>	Pending
1/8/25	<i>Request Court Clarification of Any Order Issued During the Pendency of the 'Discovery Conference' Held By This Court 28 August 2024</i>	Pending
1/10/25	<i>Subpoena Duces Tecum to: Gerald Harley, ALA, 400 Wood Street, Batavia, Ohio 45103</i>	Pending
1/10/25	<i>Notice of Filing of HVAC Expert Dr. David Deger Written 28 Page Report (Exhibit A) and a Report Video Accompaniment (Exhibit B). Both Exhibits and this Filing Cover are Current and Accurate Portrayals of the HVAC Conditions at the Madison House, Located at 2324 Madison Road, Cincinnati, Ohio 45208</i>	Pending
1/13/25	<i>Affidavit of David R. Deger, PHD</i>	Pending
2/5/25	<i>Affidavit of Disqualification of Judge Jenkins</i>	Dismissed as Moot
3/2/25	<i>HVAC Supplemental Report of Madison House Temperature Readings by Plaintiff Expert Witness Dr Deger to Original Written (and Video) Reports and Affidavit as Filed on the Docket 10 January 2025 and 13 January 2025 Respectively</i>	Pending
3/5/25	<i>Motion to Compel Discovery Under Civ.R.47</i>	Pending
3/5/25	<i>Motion to Strike or Void Trial Court Decisions</i>	Denied
4/12/25	<i>Notice to Strike Second 'Surreply' of Defendant Madison House Filed April 7<sup>th</sup>, 2025 &amp; Supplemental Evidence</i>	Pending
4/30/25	<i>Subpoena for Witness Issued to Dave Borkerstette</i>	Pending

<b>Date</b>	<b>Motion (as titled by Mr. Ragouzis)</b>	<b>Disposition</b>
4/30/25	<i>Subpoena for Witness Issued to Robert Henton</i>	Pending
4/30/25	<i>Subpoena for Witness Issued to Regina Scott, Detective</i>	Pending
4/30/25	<i>Subpoena for Witness Issued to Palmer McGhee</i>	Pending
5/2/25	<i>Subpoena for Witness Issued to Steven Oyster</i>	Pending
5/2/25	<i>Subpoena for Witness Issued to Beth Thomas</i>	Pending
5/3/25	<i>Revised Witness List for May 8, 2025 Hearing: Adding #10</i>	Pending



**Mr. Ragouzis' Email Correspondence**

<b>Date</b>	<b>Addressed To</b>	<b>Email Text</b>	<b>Docketed in Record</b>	<b>Tab Number</b>
7/3/2024	Nicholas Barnes, Esq.	"Why are you so difficult? Because of your misrepresentations to the Court in our plaintiff case and obstructions more generally, most opposing parties to you and you ilk including but not limited to (ashton, wood lamping, Thomas L cuni law and others) will not face a withering wave of discovery and ODC calls for investigation of your conduct...You are a PUTZ! Become a reasonable Lawyer my friend."	Exhibit A-7 in July 10, 2024 <i>Motion of Defendant the Madison House Condominium Owners' Association, Inc. for Preliminary Injunctions Against Plaintiff Edgar T. Ragouzis, AKA Edgar Thomas Ragouzis</i>	1
7/15/24	Nicholas Barnes, Esq.	"I will be filing discovery soon with my experts and hope to have an internal attorney, on my staff, soon to continue this Bullshit with you. I will be filing an ODC complaint against you soon as well. In my opinion you represent what is terribly wrong with our justice system. Problem is, about 30% of the voting public approves (which includes many elected judges, teachers and elected prosecutors), until they are ensnared!! This is your choice to make...YOU CANNOT PUSH ME AROUND and if you have not learned that lesson yet, well just keep doing your stupid stuff."	Exhibit A-1 in July 22, 2024 <i>Memorandum in Opposition of Defendants to Plaintiff Edgar T. Ragouzis' Motion to Stay All Proceedings</i>	2
7/25/24	Nicholas Barnes, Esq.	"You are <u>a</u> grifter."		3
7/31/24	Nicholas Barnes, Esq.	"Barney, you are a leach!"		4
7/31/24	Nicholas Barnes, Esq.	"I have made a filing, Nick. Your lies are erupting."		5
8/1/24	Nicholas Barnes, Esq.	"PUTZ"		6


  
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Mr. Ragouzis' Email Correspondence

Date	Addressed To	Email Text	Docketed in Record	Tab Number
8/1/24	Nicholas Barnes, Esq.	"If you make an issue of this then I will deal with you."	Exhibit C-1 in August 19, 2024 Motion of Defendant the Madison House Condominium Owners' Association Inc. for an Order Directing Plaintiff Edgar T. Ragouzis, AKA Edgar Thomas Ragouzis to Show Cause Why He Should Not Be Held in Contempt	7
8/1/24	Nicholas Barnes, Esq.	"Communicating the TRUTH is a nuisance? Well Barney in your world, maybe. Barney ran a car with his feet!"	Exhibit C-1 in August 19, 2024 Motion of Defendant the Madison House Condominium Owners' Association Inc. for an Order Directing Plaintiff Edgar T. Ragouzis, AKA Edgar Thomas Ragouzis to Show Cause Why He Should Not Be Held in Contempt	8
8/9/24	Nicholas Barnes, Esq.	"ManoManishewitz, you really do try to get away with the next thing to murder and you bill Chubb, our insurance Company."		9
8/9/24	James Cummins, Esq. and Nicholas Barnes, Esq.	"Me not asking you dunderheads multiple times does NOT excuse you from complying. Get me my stuff."		10


  
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**Mr. Ragouzis' Email Correspondence**

Date	Addressed To	Email Text	Docketed in Record	Tab Number
8/10/24	James Cummins, Esq.	"Just want to advise you that I am planning to sue all your clients in your madison house class action certified by Jenkins...YOU MUST ADVISE YOUR CLIENTS OF THE POTENTIAL RAMIFICATION OF MY LEGAL AND FINANCIAL ACTION AGAINST THEM AS STATED IN THIS TRANSMITTAL. FAILURE TO TAKE INFORMATIVE ACTION WITH YOUR CLIENTS MAY RESULT IN ACTION TAKEN BY ME AND OTHERS AGAINST YOU. I understand you worked for the disgraced attorney, Chesley. I don't give a shit who you ever worked for or where you learned your trade. Just now, I will take (not a threat) no prisoners in this bullshit you started. Walk away while you still can. I DO NOT WANT TO BE THE ONE THAT MAKES OLD LADIES MOVE OR MAKES THEM PAY FOR BAD MANAGEMENT AND GOVERNANCE."		11
8/10/24	Nicholas Barnes, Esq.	"Tmh will be called upon v soon thru Ashton for depos in the luebbbers case. I will be petitioning the Luebbbers court to be present at those depos as the Jenkins Court, in its infinite wisdom, saw fit to dismiss these rascals in the ..83 case. Keep playing in the sand box boys."		12
8/12/24	Nicholas Barnes, Esq.	"GET ME THE DISCOVERY! YOU ARE IN SERIOUS JEOPARDY AND I WILL NOT STOP UNTIL YOU ARE HELD TO ACCOUNT."	Exhibit C-2 in August 19, 2024 Motion of Defendant For an Order Directing Plaintiff Edgar T. Ragouzis to Show Cause Why He Should Not Be Held in Contempt	13
8/16/24	Nicholas Barnes, Esq.	"HOW MANY ORDERS FROM THE CITY DO I NEED FOR MY JURY? I WILL BEAT YOUR ASS, YOU ARE A PUNK! YOU HAVE ONE DAY LEFT DUDE."	Exhibit C-2 in August 19, 2024 Motion of Defendant For an Order Directing Plaintiff Edgar T. Ragouzis to Show Cause Why He Should Not Be Held in Contempt	14

  
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**Mr. Ragouzis' Email Correspondence**

Date	Addressed To	Email Text	Docketed in Record	Tab Number
8/16/24	James Cummins, Esq.	"YOU ARE ON NOTICE, PRODUCE PERKINS AND HER DAUGHTER WHO ASSAULTED ME IN THE COMMON AREA. PRODUCE THE VIDEO THE LARGE DAUGHTER AND CAROL RECORDED WHILE LAUGHING AT ME AS I COWERED INTO MY UNITS!"		15
8/19/24	Nicholas Barnes, Esq.	"When Desantis said he would 'start sliding throats' of federal workers on day one of his presidency. DID ANYONE BELIEVE DESANTIS WOULD REALLY SLAUGHTER PEOPLE? BARNEY IS OUT THE DOOR MAD THAT THE DILAPIDATED MADISON HOUSE CONDITION IS WAY BEYOND HIS SMALL MINDED LEGAL COMPREHENSION TO KEEP BILLING THIS MF, raking in hundreds of thousands of dollars for his little shit HOA def firm. THIS BULLSHIT MUST END!"	Exhibit 1 in August 22, 2024 <i>Motion and Memorandum of Codefendant Michael R. Patterson, d/b/a SRES, Inc. in Support of Motion of Defendant For an Order Directing Plaintiff to Show Cause Why He Should Not Be Held in Contempt</i>	16
9/4/24	Cummins Law	"We appose any leeway to you renegades, miscreants and grifters! Your firm has cost the plaintiffs dearly, we will get to that later."		17
9/9/24	Nicholas Barnes, Esq.	"You are in trouble. Not even touching Jenkins and the terrible dismissal or instant records of prejudice. Get me a much btr settlement prop. Now! Otherwise I'll put more action behind my position."	Exhibit A-1 in September 13, 2024 <i>Counterclaim Plaintiffs' Motion for Partial Summary Judgment to Declare Edgar T. Ragouzis a Vexatious Litigator</i>	18
9/9/24	Nicholas Barnes, Esq.	"It's on you as usual. You are a POS. (Not fighting words p/Jenkins)."	Exhibit A-2 in September 13, 2024 <i>Counterclaim Plaintiffs' Motion for Partial Summary Judgment to Declare Edgar T. Ragouzis a Vexatious Litigator</i>	19

  
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 CLERK OF THE HAMILTON COUNTY  
 COURT, HAMILTON COUNTY, OHIO  
 DEPUTY



**Mr. Ragouzis' Email Correspondence**

<b>Date</b>	<b>Addressed To</b>	<b>Email Text</b>	<b>Docketed in Record</b>	<b>Tab Number</b>
9/11/24	Nicholas Barnes, Esq. and Tim Riker, Esq.	"Because you moved the court in an abject way to dismiss with prejudice, I am allowing you both an out. Propose an ending solution now. Otherwise an appeal will be filed as the Judge violated Hillabrand, which Barnes pushed (Quonset). Also the transcript reveals the Judge is clueless about the 8 months long sojourn to dismiss Cummins (being nice). I have other avenues for justice; without an off ramp these righteous actions will be taken regardless of cost."	A-3 in September 13, 2024 <i>Counterclaim Plaintiffs' Motion for Partial Summary Judgment to Declare Edgar T. Ragouzis a Vexatious Litigator</i>	20
9/13/24	Nicholas Barnes, Esq. and Judge Jenkins Staff Attorney	"Reprobate, that's you."	A-4 in September 13, 2024 <i>Counterclaim Plaintiffs' Motion for Partial Summary Judgment to Declare Edgar T. Ragouzis a Vexatious Litigator</i>	21
11/20/24	100+ individuals	"Many things can happen now. I can refile suit against every owner as you have participated in the Cummins class action...I'm not done here. Think about what you think is best. Listening to a Stan Chelsey used to be employee may be a v bad strategy. Mr Cummins is that! Time is short."	Exhibit A in December 4, 2024 <i>Counterclaim Plaintiffs' Motion for an Order Directing Counterclaim Defendant Ragouzis to Show Cause</i>	22
12/4/24	100+ individuals	"On the above subject date an email directed to MadHouse Truth and Aerin Shaw mistakenly attached the service email chain as Aerin Shaw had originally included...to all of you, I apologize for this mistakenly sent email which you may have received and reviewed on 20November2024."	Exhibit A in December 20, 2024 <i>Counterclaim Plaintiffs' Reply in Support of Their Motion for an Order Directing Counterclaim Defendant Ragouzis to Show Cause</i>	23



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Mr. Ragouzis' Email Correspondence

Date	Addressed To	Email Text	Docketed in Record	Tab Number
1/15/25	Nicholas Barnes, Esq.	"But nick, I am curious, why did you choose this particular practice type. Maybe because you 'could not loose.' Being paid by dead beats or condos.? You are a Leach. A very bad typecast...I will show you a better way and you will become a better person."	Exhibit A-4 in the January 23, 2025 Motion of Defendant for an Order Directing Plaintiff to Show Cause Why He Should Not Be Held in Further Contempt	24
3/3/25	Nicholas Barnes, Esq.	"You and Jenkins; both do not understand English. No is no...Barney, do not get all tangled up in your underwear!"	Exhibit A-3 in the March 7, 2025 Notice of Supplemental Evidence in Support of the Motion of Defendant for an Order Directing Plaintiff to Show Cause Why He Should Not Be Held in Further Contempt	25