

IN THE COURT OF COMMON PLEAS, MADISON COUNTY, OHIO

County Commissioners'
Association of Ohio,

Plaintiff(s),

-vs-

Greg A. Bell, et al.,

Defendant(s).

FILED
In The Court of Common Pleas Case No. CVH 20110036
Madison County, Ohio

MAR 25 2013

Rene E. Blaudil
Clerk of Courts

ENTRY

On February 3, 2011, the Court issued a temporary restraining order against Greg A. Bell and Marcia C. Bell based on a preliminary showing that they were vexatious litigators.

On February 14, 2011, plaintiff County Commissioners' Association of Ohio (CCAO) filed a motion for a preliminary injunction and requested continuation of the temporary restraining order during the pendency of this case.

On that date, the Madison County Board of Commissioners (MCBC) filed a motion to intervene in the case.

On February 15, 2011, the Court conducted a hearing on CCAO's motion for a preliminary injunction. On the evidence and applicable law, the Court issued a preliminary injunction on February 16th.

On March 7, 2011, defendants Bell moved for a 30 day extension "to move or plead." On March 9, 2011, the Court granted defendants an extension to move or plead on or before March 24, 2011. The Court reserved judgment to MCBC's motion to intervene.

Within the scope of the preliminary injunction, defendants moved the Court for

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Court granted defendants authority to file said motions instanter. On April 7, 2011, CCAO filed a motion contra to defendants' filings. Defendants replied to plaintiff's response and argued that CCAO lacked standing to prosecute a vexatious litigator claim.

On May 12, 2011, Marcia Bell filed a "Notification of Filing Under Bankruptcy Code and Suggestion of Stay."

On May 16, 2011, the Court found that CCAO had standing to bring the within action and MCBC had the right to intervene.

On September 28, 2011, CCAO gave notice "of filing the Agreed Order Granting Relief From Co-Debtor Stay as it pertains to defendant Greg Bell. CCAO is ready for trial. * * *"

The Court did not respond to CCAO's assertion that it was ready for trial primarily because Marcia Bell remained protected by the bankruptcy stay. The case had been removed from the Court's trial docket because of the bankruptcy.

On November 9, 2012, CCOA and MCBC filed simultaneously: a motion for default judgment against defendants Bell; a motion for summary judgment against defendant's Bell with attached exhibits "A" through "F"; a transcript of the February 15, 2011, preliminary injunction hearing together with 67 exhibits admitted therein; an "Agreed Order to Lift the Automatic Stay of Debtor Marcia Bell"; and a "Consent Decree Deeming Defendant Marcia Bell a Vexatious Litigator Under Ohio Law."

On November 20, 2012, the Court issued notice to defendants that plaintiffs' motions for default and/or summary judgment would be decided on the filings fourteen days after the date the Clerk journalized the entry.

Defendant Marcia Bell moved to strike the purported consent decree that she was a vexatious litigator. She avers that she did not agree to the terms of the "consent decree". she did not sign it and she did not authorize "any attorney" to sign such a

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document. Defendant Marcia Bell moved the Court to stay further proceedings in this case so that she could attack the "Agreed Order" in the Bankruptcy Court. As of March 8, 2013, the docket of her bankruptcy proceeding shows no action in the court regarding the November 5, 2012, lifting of the stay.

On December 7, 2012, defendant Greg Bell moved the Court for leave to file motions and thereafter moved the Court "To Reconsider and to Dismiss" CCOA's complaint for lack of jurisdiction. He opposed plaintiff's motion for default judgment as made in bad faith. He opposed plaintiff's motion for summary judgment by legal arguments but without complying with Civ.R. 56(C) and (E).

Defendants Bell have failed to answer CCOA's complaint in which they are alleged to be vexatious litigators. They are in default, and at this writing neither is protected by a bankruptcy stay.

Plaintiff's motion for default judgment is Sustained.

Defendant Greg Bell opposed summary judgment by memorandum contra and through the filing of his objections to a Magistrate's Decision filed in the Madison County Court of Appeals. Defendant Marcia Bell made no filings in opposition to summary judgment.

From the positively verified complaint, the exhibits admitted at hearing on CCOA's motion for a preliminary injunction and from the attachments to plaintiff's motion for summary judgment, the Court finds that there is no genuine issue as to any material fact and that plaintiffs are entitled to judgment that defendant Greg Bell and defendant Marcia Bell are vexatious litigators as a matter of law.

On February 3, 2003, MCBC commenced an appropriation case against defendants Bell to acquire a simple construction/maintenance easement over Bell's property as a part of a Choctaw Lake Subdivision sewer project. Bells answered

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counter-claimed and filed a third-party complaint in which they raised a series of state and federal statutory and constitutional violations. Bd. of Commrs. of Madison Co. v. Bell, Madison Co. C.P., Case No. 2003CV-02-071.

During the pendency of the appropriation case, Bells filed an affidavit of disqualification pursuant to R.C. 2701.03 to remove this sitting judge from the case. The Chief Justice denied disqualification by journal entry. Bd. of Commrs. of Madison Co. v. Bell, Supreme Court of Ohio, Case No. 2004-AP-064.

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During the pendency of the appropriation case, Bells filed an Original Action in Prohibition in the Twelfth District Court of Appeals to prevent this trial judge from proceeding further in the eminent domain case. The Court of Appeals dismissed the case. State of Ohio, ex rel. Greg A. Bell v. Robert D. Nichols, Twelfth District Court of Appeals, Case No. 2004-05-013. Bell then appealed the judgment of dismissal to the Supreme Court. The Supreme Court dismissed the case for failure to prosecute by entry of November 22, 2004. State of Ohio, ex rel. Greg A. Bell v. Robert D. Nichols, Supreme Court of Ohio, Case No. 2004-1462.

The appropriation case came on for jury trial beginning July 11, 2005. The jury found that MCBC were entitled to a construction easement over the entire property until completion of the sewer connection and other conditions subsequent. The jury found zero compensation. The Court entered a final judgment accordingly. Bd. of Commrs. of Madison Co. v. Bell, Madison Co. C.P., Case No. 2003-CV-071, 29 August 2005, entry.

Bells prosecuted an appeal from the appropriation judgment to the Twelfth District Court of Appeals. Bd. of Commrs. of Madison Co. v. Bell, Twelfth District Court of Appeals, Case No. 2005-09-036. The Court of Appeals affirmed the appropriation judgment on March 27, 2007. Bells appealed that decision to the Ohio Supreme Court on May 11, 2007. which declined to accept jurisdiction by entry of

August 29, 2007. Bd. of Commrs. of Madison Co. v. Bell, Supreme Court of Ohio, Case No. 2007-0883.

On April 30, 2008, Bells commenced a civil action for declaratory judgment and injunctive relief against Robert D. Nichols, Stephen J. Pronai, David Dhume, Robert D. Hackett, Chris Snyder, Stephen G. LaForge, "Isaac, Brant, Ledman & Teetor, LLP", County Risk Sharing Authority, Inc. (CRSA), Beth Miller, Mid-Ohio Pipeline Company, Inc., URS Corporation, James P. Sabin and MCBC. Bells v. Robert D. Nichols, et al., Franklin County Court of Common Pleas, Case No. 08CVA-04-6427. Plaintiffs clearly allege that this case constituted "a collateral attack upon a judgment in the case of [MCBC v. Bells], No. 2003CV-02-071."

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The Franklin County filing, predicated a collateral attack in the trial court, appellate and Supreme Court decisions and judgments granting a construction/ maintenance easement over Bells' property, was obviously intended to harass parties and participants in that litigation the underlying theory of such collateral attack was not warranted under existing law nor supported nor supportable by a good faith argument for an extension, modification or reversal of existing law.

On December 3, 2008, the trial judge in that case denied Bells' motion to disqualify attorneys Linda L. Woeber and Lisa M. Zaring. January 2, 2009, Bells appealed the disqualification decision to the Franklin County Court of Appeals. Bells v. Robert D. Nichols, Franklin County Court of Appeals, Case No. 09APE01004. The Court of Appeals dismissed the appeal on February 27, 2009, for "Lack of Final Appealable Order."

On April 3, 2009, the Franklin County Court of Common Pleas entered the following judgment: Decision and Entry granting defendants Stephen G. LaForge and Issac, Brant, Ledman & Teetor, LLP's motion to dismiss filed July 29, 2008. Decision

and Entry granting defendant URS Corporation Ohio's motion for judgment on the pleadings filed July 31, 2008; Decision and Entry granting defendant Mid-Ohio Pipe Line Co., Inc.'s motion to dismiss pursuant to Civ.R. 12 (B)(6) filed July 31, 2008; Decision and Entry granting defendants County Risk Sharing Authority, Inc. and Beth Miller's motion to dismiss filed July 31, 2008; Decision and Entry granting defendants Stephen Pronai, David Dhume, Robert Hackett, Chris Snyder, James Sabin, and MCBC's motion to dismiss filed July 1, 2008; Decision and Entry granting defendant Judge Robert D. Nichols' motion to dismiss filed August 5, 2008; and Entry denying plaintiffs' motion to extend the time filed December 18, 2008.

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The court on April 3, 2009, issued an "Entry Denying Plaintiffs' Motion to Disqualify Attorneys Timothy S. Ranking (sic) and Craig J. Spadafore filed August 13, 2008."

On May 4, 2009, Bells appealed the April 3, 2009, trial court decisions and entries to the Twelfth District Court of Appeals, Bells v. Robert D. Nichols, Case No. 09APE05-0438. On September 15, 2009, the Court of Appeals overruled Bells' assignments of error and entered judgment accordingly. On October 30, 2009, Bells appealed the Court of Appeals decision to the Ohio Supreme Court, Case No. 09-1992. The Supreme Court denied review on January 27, 2010.

On March 9, 2010, the Franklin County Common Pleas Court granted defendants' motion to reactivate the case for post-appeal sanctions against Bell in the 08-CVH04-6427 case.

On July 18, 2009, the Franklin County Common Pleas Court Magistrate issued a decision of defendants' motions for sanctions. The Magistrate reviewed the filings and applicable law. His findings are relevant to the vexatious litigator claims in the case sub iudice:

Franklin County Litigation

On April 30, 2008, the Bells filed the Complaint in this action against Defendants Judge Nichols, the Commissioners, Stephen LaForge (counsel to the Commissioners in the Madison County action), Isaac Brant Ledman & Teetor (Mr. LaForge's firm), County Risk Sharing Authority, Inc. ("CORSA"); the insurer for the Madison County officials), Beth Miller (employee of CORSA), Mid-Ohio Pipeline, URS Corporation, James P. Sabin (Madison County Sheriff), and the Board of Commissioners. The Complaint, in paragraph one, alleged that "Part of this case is a collateral attack upon a judgment in the case of *Madison County Board of Commissioners vs. Greg A. and Marcia Bell* No. 2003CV-02-071...."

In response to the Complaint, the Defendants filed motions to dismiss and to stay discovery. On August 13, 2008, the Bells filed a Motion to Disqualify Attorneys Timothy S. Rankin and Craig J. Spadafore. On October 17, 2008, the Bells filed a Motion to Disqualify Attorneys Linda L. Woeber and Lisa M. Zaring. On December 3, 2008, the Court issued a Decision and Entry Denying Plaintiff's Motion to Disqualify Attorneys Woeber and Zaring. The Bells filed an appeal, which was dismissed by the Court of Appeals on February 27, 2009. On April 3, 2009, the Court issued an Entry Denying Plaintiff's Motion to Disqualify Attorneys Rankin and Spadafore. On April 3, 2009, the Court issued a Decision and Entry granting summary judgment in favor of the Defendants. The Court stated as follows:

After a thorough review of the record, it is clear that the majority of the Bells' claims are a repackaging of issues addressed or that could have been addressed by the Madison County Court of Common Pleas and the Twelfth District Court of Appeals. To be sure, the Bells admit that they are collaterally attacking the

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judgment rendered against them. They assert that the doctrine of res judicata does not apply based on their contention that the underlying judgment was procured by "fraud" and was rendered by a court without competent jurisdiction. However, their allegations of fraud and absence of jurisdiction were raised in and rejected by the appellate court.

...
Moreover, the jury's determination that the Commissioners were entitled to an easement on the Bells' property and that they were not entitled to any compensation for the easement was affirmed. Yet, the Bells continue to challenge the propriety of that taking and are improperly seeking to relitigate issues that were or could have been addressed in the underlying action. Consequently, the Court finds that their claims against the Commissioners, Pronai, Sabin, Judge Nichols, LaForge, Issac Brant, URS, and Mid-Ohio Pipeline are barred by the doctrines of res judicata and encompassed concept of collateral estoppel.
(Decision, p. 15-17)

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The Bells appealed this Court's Decision. On September 15, 2009, the Tenth District Court of Appeals issued a Decision affirming this Court's judgment. The Court of Appeals stated as follows:

The basic premise of the lawsuit filed in Franklin County to attack the Madison County judgment is that the common pleas court in Madison County did not have jurisdiction over an appropriation case involving a property interest in land in Madison County. Stated that simply, the fallacy of the premises is apparent. The common pleas court in the county where the land is situated always has jurisdiction over appropriation actions involving the land.

The argument presented on behalf of the Bells is that the common pleas court judge in Madison County and various other public officials behaved in such a way as to divest the Madison County Court of Common Pleas of the jurisdiction which it alone possesses. This argument was presented in detail to the Twelfth District, which totally rejected it.

The common pleas judge who heard the collateral attack filed in Franklin County felt that she was bound by the decisions rendered in the Madison county court and the Twelfth District. The judge in the Franklin County Court of Common Pleas was clearly correct.

Litigation must always come to an end at some point in time. A party or parties cannot litigate a point over and over. Once the point has been decided by a court of competent jurisdiction, that point and all related points which could or should have been raised are permanently decided. Case law commonly refers to such points as *res judicata*, which is merely Latin for 'a matter decided.'

Sometimes a related legal theory, collateral estoppel, comes into play. Collateral estoppel means a party cannot attack from a different angle what has been already decided or could have been decided in prior litigation. The party is prevented from making a new argument which could or should have been made before the point was made in a prior lawsuit.

As stated before, the Madison County court had jurisdiction over the appropriation case involving land owned by the Bells. The judgment rendered was appealed to the appropriate court of appeals, the Twelfth District. With that, the litigation of the issues in the appropriate case comes to an end.

The case law on *res judicata* and collateral estoppel is clear and was appropriately set forth in the trial court's decision granting summary judgment against the Bells' collateral attack.

(Decision, pgs. 2-4)

Bell v. Nichols, 2009-Ohio-4851. The Ohio Supreme Court declined to allow a discretionary appeal from the Court of Appeals' decision. *Bell v. Nichols*, 2010-Ohio-188

Bells v. Robert D. Nichols, Franklin County Common Pleas Court, Case No. 2007-Ohio-4285, Magistrate's Decision, pp.3-5.

On October 5, 2010, the trial court overruled Bells' objections to the Magistrate's Decision that recommended recovery in favor of CORSA and Judge Robert D. Nichols respectively in the amounts of \$92,601.32 and \$22,112.40 against plaintiffs and their counsel, Philip Wayne Cramer based on frivolous conduct. The court issued a "Decision and Entry Overruling Plaintiffs' Objections to Magistrate's Decision filed August 30, 2010" and "Entry Granting Defendant Robert D. Nichols' Motion to Substitute Columbia Casualty Company as the Real Party in Interest Filed May 8, 2010."

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On November 1, 2010, Bells and Attorney Cramer filed a notice of appeal of trial court's October 5, 2010, decision and entry. Franklin County Court of Appeals, Case No. 10APE11-1036.

On June 29, 2010, Madison County Prosecutor Stephen J. Pronai in his official capacity filed a complaint in the Court of Common Pleas of Madison County against Greg and Marcia Bell demanding that they be declared vexatious litigators and for other relief. Pronai v. Bells, Madison County Common Pleas Court, Case No. CVH20100241. Bells promptly removed to the United States District Court, Southern District of Ohio, on August 2nd.

On August 10, 2010, a federal magistrate found that vexatious litigator issues were properly a state matter, and therefore the Magistrate recommended the trial court sua sponte remand the case to this Court. On November 19, 2010, the Federal District Court adopted the Magistrate's Decision and ordered the recommended remand. Federal District Court Case No. 2:10-00685. On December 17, 2010, Bells appealed the federal remand decision to the Sixth Circuit Court of Appeals. This Court granted a stay in these proceedings pending federal appeal on January 25, 2011.

While the vexatious litigator case festered in federal court, on August 13, 2010, Bell filed a second affidavit of disqualification against me from presiding over the vexatious litigator case. Ohio Supreme Court, Case No. 10AP080. On September 16, 2010, the Supreme Court overruled the affidavit and directed the court to proceed.

Bell apparently commenced a mandamus action against MCBC in the Twelfth District Court of Appeals resulting in adverse decision on July 14, 2010. That court noted: "Turning to the present mandamus action, it is clear that relator has extensively litigated; or at least had the opportunity to litigate, all of the claims and issues for which he seeks mandamus." State of Ohio, ex re., Greg A. Bell v. MCBC, Madison County Court of Appeals, Case No. 2010-04-010, p.3. (Emphasis added.) The Ohio Supreme Court affirmed the court of appeal denial of a writ of mandamus. Bell v. MCBC, Ohio Supreme Court, Case No. 2010-1525.

On September 15, October 6 and November 10, 2009, Bell instituted successive original actions in mandamus against David Brooks in his capacity as managing director of County Risk Sharing Authority, Inc. (CORSA) in the Franklin County Court of Appeals. All three cases related to production of public records, explanations as to why records were not produced and claims for monetary damages. The Court of Appeals consolidated the cases for consideration, and on June 24, 2010, the Magistrate found the Relator Bell "has failed to show by clear and convincing evidence that CORSA is a public institution under R.C. 149.011(A) and is, thus, the functional equivalent of a public office." State of Ohio ex rel. Greg Bell v. Brooks, Franklin County Court of

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Appeals, Case Nos. 09AP861, etc., Magistrate's Decision, p.6. The Magistrate recommended that the court deny relator's request for a writ of mandamus.

Bell objected to the Magistrate's Decision, and on September 9, 2010, the court overruled the objections and denied relator's requests for writs of mandamus. The court entered judgment accordingly.

Bell the prosecuted an appeal of the appellate decision to the Ohio Supreme Court, Case No. 10-1836, which referred the matter to Mediation by entry dated November 20, 2010.

The Ohio Supreme Court issued a decision on September 28, 2011, holding:

Because the court of appeals did not err in holding that Bell did not establish that CORSA is the functional equivalent of a public office for purposes of R.C. 149.43 and that holding is dispositive of Bell's claim for CORSA's board-meeting minutes, we affirm the portion of the judgment of the court of appeals denying writ of mandamus relating to those records. But because the court of appeals erred in denying writs of mandamus regarding Bell's records requests for CORSA's financial and compensation records, we reverse the portion of the judgment of the court of appeals for further proceedings, including the submission of evidence and briefs on those remaining claims.

State ex rel. Bell v. Brooks (2011), 130 Ohio St.3d 87, 95.

In Bells appeal of the sanction judgment, Judge Pfeiffer conditionally granted their motion to stay proceeding during appeal but denied their counsel's motion. Bells v. Nichols, Case No. 08CVH04-6427.

On May 24, 2010, Greg Bell commenced an original action in prohibition in the Tenth District Court of Appeals against Judge Beverly Y. Pfeifer, Edwin L. Skeens, Timothy Rankin, Craig Spadafore, CORSA, Linda Woeber, Lisa Zaring and Columbia Casualty Company. State ex rel. Bell v. Pfeiffer, Franklin County Court of Appeals, Case No. 10 APD05-490. On August 31, 2010, the Magistrate issued a decision finding that Bell could prove no set of facts entitling him to the relief he sought.

On November 20, 2009, Greg Bell commenced an original action in mandamus against Thomas Strup, Deputy Director of Operations for County Commissioners' Association of Ohio in his/its relationship with the County Employee Benefits

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Consortium of Ohio. State ex rel. Bell v. Thomas Strup, Franklin County Court of Appeals, Case No. 09APD11-1089. On October 15, 2010, the Magistrate denied relator's motion for sanctions.

On April 13, 2010, Greg Bell commenced an original action in mandamus against MCBC and State of Ohio Environmental Protection Agency in an attempt to relitigate the original appropriation case. State ex rel. Bell v. MCBC, et al., Twelfth District Court of Appeals, Case No. 20100010.

On February 24, 2011, Bell commenced a civil rights claim against everyone connected to his state litigation including judges, magistrates, attorneys, commissioners, corporations, public officials and others. Greg A. Bell v. Timothy S. Rankin, et al., United States District Court, Southern District of Ohio, Eastern Division, Case No. 2-11-CV-0168. On March 28, 2011, Bell filed an amended complaint on the same issues against the same parties.

CCAO commenced this case under threat from Greg Bell that he would institute a taxpayer suit pursuant to R.C. 309.13 unless multiple counties terminate their affiliations with CCAO, County Risk Sharing Authority, Inc. (CORSA) and County Employee Benefits Consortium of Ohio, Inc. (CEBCO). (Plaintiff's Exhibit "B" and "C"). The Madison County Prosecuting Attorney received plaintiff's Exhibit "C".

If it appears from the evidence that there is no genuine issue of material fact to be litigated, that the moving party is entitled to judgment as a matter of law and that reasonable minds can only come to a conclusion adverse to the non-moving party, then the moving party is entitled to summary judgment.

R.C. 2323.51 provides, inter alia:

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2323.52 Vexatious litigators

(A) As used in this section:

(1) 'Conduct' has the same meaning as in section 2323.51 of the Revised Code.

(2) 'Vexatious conduct' means conduct of a party in a civil action that satisfies any of the following:

(a) The conduct obviously serves merely to harass or maliciously injure another party to the civil action.

(b) The conduct is not warranted under existing law and cannot be supported by a good faith argument for an extension, modification, or reversal of existing law.

(c) The conduct is imposed solely for delay.

(3) 'Vexatious litigator' means any 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. 'Vexatious litigator' does not include a person who is authorized to practice law in the courts of this state under the Ohio Supreme Court Rules for the Government of the Bar of Ohio unless that person is representing or has represented self pro se in the civil action or actions.

* * *

The conduct described in R.C. 2323.51 is defined as follows:

(A) As used in this section:

(1) 'Conduct' means any of the following:

(a) The filing of a civil action, the assertion of a claim, defense, or other position in connection with a civil action, the filing of a pleading, motion, or other paper in a civil action, including, but not limited to, a motion or paper filed for discovery purposes, or the taking of any other action in connection with a civil action;

* * *

Within the scope of the litigation the subject of the instant case, Bells' collateral attack in Franklin County on the Madison County Court of Common Pleas appropriation judgment was found to be frivolous within the statutory framework of R.C. 2323.51.

Bells v. Robert D. Nichols, Franklin County Court of Common Pleas, Case No.

08CVA04-6427. Although not identical, frivolous and vexatious conduct are parallel.

Once the Madison County appropriation case had been appealed to the Ohio Supreme Court, res judicata and collateral estoppel barred further litigation. Therefore all subsequent filings in which Bells sought collateral review of the Madison County judgment became frivolous, and the inclusion of attorneys and court personnel in subsequent litigation became vexatious. Such filings obviously served to harass and maliciously injure opposing parties, their counsel, court personnel and others. Under issue preclusion, Bells' filings were unwarranted under existing law and could not, and in defense of plaintiff's motions for summary judgment, have not been supported by good faith arguments for an extension, modification, or reversal of existing law. Bell's attempts to disqualify attorneys and judges were dilatory acts imposed solely for delay.

Bells represent the apotheosis of vexatious litigators. They have offered no factual predicate to create a genuine issue of fact. Plaintiffs be and hereby are entitled to judgment as a matter of law.

Plaintiff's motions for summary judgment are Sustained in whole and each particular.

Judgment is hereby entered in favor of plaintiffs CCAO and MCBC against Greg A. Bell and Marcia C. Bell;

It Is Further Ordered that Greg A. Bell and Marcia C. Bell be and hereby are prohibited from all of the following without first obtaining leave from this Court to proceed:

- Instituting legal proceedings in the Court of Claims or in a Court of Common Pleas, Municipal Court or County Court;
- Continuing any legal proceedings that the vexatious litigator has instituted in the Court of Claims or in a Court of Common Pleas, Municipal Court, or County Court prior to the entry of this order.

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- Making any application, other than an application for leave to proceed under R.C. 2323.52(F)(1) in any legal proceedings instituted in the Court of Claims or in a Court of Common Pleas, Municipal Court, or County Court;
- Instituting legal proceedings, or continuing any previous legal proceedings, in a court of appeals, other than an application for leave to proceed under R.C. 2323.52(F)(2); and,
- Any other legal and equitable relief mandated by R.C. 2323.52 and Ohio law, including, but not limited to, all attorneys' fees and other relief afforded by the Court.

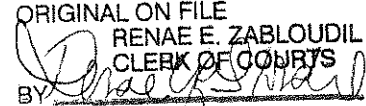
Costs taxed to Bells for which execution is awarded.

ENTER: March 21, 2013



Robert D. Nichols, Judge

cc: Mark Troutman
 Timothy S. Rankin
 Philip Wayne Cramer
 Greg A. and Marcia C. Bell
 Court Administrator

I HEREBY CERTIFY THAT THIS
 IS A TRUE COPY OF THE
 ORIGINAL ON FILE
 RENAE E. ZABLOUDIL
 CLERK OF COURTS
 BY 

314-1728