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COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

- - -

CITY OF MADEIRA,)
)
 Plaintiff,)
) Appeal No. C2000458
vs.)
) Case No. A1802415
PHILIP DOUGLAS)
OPPENHEIMER)
)
 Defendant.)

- - -

TRANSCRIPT OF PROCEEDINGS
FOR APPEAL

- - -

APPEARANCES:

Steve Goodin, Esq.,
Brian W. Fox, Esq.,
 On behalf of the Plaintiff.

Curt C. Hartman, Esq.,
 On behalf of the Defendant.

BE IT REMEMBERED that upon the hearing of
this cause, on September 30th, 2020, before the
Honorable Megan E. Shanahan, a said judge of the
said court, the following proceedings were had, to
wit:

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P-R-O-C-E-E-D-I-N-G-S

September 30, 2020

THE COURT: On the record on City of Madeira versus Philip Douglas Oppenheimer, A1802415. Set on oral arguments for a Motion for Summary Judgment.

Much to my dismay, I got a phone call and e-mail yesterday from counsel for Madeira indicating that this date didn't, quote, make their calendar.

I'm angry, shocked, and appalled at the failure on behalf of counsel for allowing this to happen on this case.

Back on June 29th we had a telephone conference. That failed to make one of two counsel's calendar who got on the phone call late indicating he was at the barber.

We had an extensive discussion about whether or not the plaintiffs would exercise the right under the tolling provision and seek additional time to respond to the Motion for Summary Judgment.

1 Mr. Fox absolutely stated he wanted
2 all of his time which the Court granted,
3 indicating that the motions would be due
4 August 28th.

5 Then in e-mail my clerk gets
6 yesterday from Mr. Goodin. It says, The
7 hearing today didn't make anyone's
8 calendar, and that plaintiffs thought
9 they had until month's d to respond to
10 the Summary Judgment.

11 Today is September 30th. Has the
12 response been filed?

13 MR. FOX: It has not, Your Honor.

14 THE COURT: Why?

15 MR. FOX: Well, we filed a Motion
16 to Compel and the motion --

17 THE COURT: That's irrelevant. Why
18 haven't you responded to the Motion for
19 Summary Judgment?

20 MR. FOX: Your Honor, in the Motion
21 to Compel, one of the things that we
22 referenced is that the lack of
23 verification on the interrogatories and
24 their discovery responses.

25 And in the interest of maintaining

1 the trial date, rather than file an
2 additional 56(F) Motion, it makes -- felt
3 like it made more sense to file a Motion
4 to Compel and Motion for Continuance to
5 ask for a brief delay while defense
6 counsel can provide some of those
7 responses that will allow for the City of
8 Madeira to substantively respond to their
9 Motion for Summary Judgment.

10 THE COURT: Mr. Hartman?

11 MR. HARTMAN: Your Honor, firstly,
12 if they thought that the Motion for
13 Summary Judgment was due at the end of
14 this month, it should be ready to be
15 filed or on the verge.

16 THE COURT: Correct.

17 MR. HARTMAN: One thing -- and I've
18 only had a chance to peruse this Motion
19 to Compel that was filed at about 4:00
20 yesterday afternoon. What Mr. Fox fails
21 to inform the Court and fails to provide
22 to the Court was a follow-up exchange in
23 terms of its verification.

24 He references an e-mail of
25 August 31st but he doesn't attach it to

1 his affidavit. I have a copy if the
2 Court wishes for it.

3 In that e-mail, my e-mail to them
4 states -- we were dealing with a federal
5 case unrelated to this litigation, that
6 being the federal litigation. But the
7 vexatious litigation lawsuit, because of
8 some short notice and immediate
9 election-related matters, I have not been
10 able to obtain Mr. Oppenheimer's
11 verification interrogatories.

12 Nonetheless, I will work on
13 obtaining that this week, but, in the
14 meantime, be advised that we will not
15 raise or object to the use of such
16 responses even without verification, to
17 which then Mr. Fox replied -- and, again,
18 did not tender it to the Court --
19 understood on the verification.

20 And so we basically said we're --
21 we will waive that issue. If they
22 tendered it and we'd object, one, I would
23 never object because I made the
24 representations as an officer of the
25 court.

1 Secondly, as the Court kind of laid
2 out what happened at the telephone
3 conference we had, which was extensive,
4 we all recognize that the Covid 19 orders
5 stayed any deadline that was going to be
6 lifted August 1st, at least as of that
7 date. It may have been extended. It was
8 not.

9 We scheduled the oral agreement
10 hearing here today based upon a timeline,
11 28 days to respond, 14 days for reply,
12 give the Court about two weeks to review
13 it.

14 Thirdly, I checked with the
15 Assignment Commissioner's Office
16 yesterday, and Mr. Fox did receive the
17 e-mail notification from the Assignment
18 Commissioner's Office about this hearing,
19 as well as the pretrial here in a couple
20 weeks and the trial set for November.

21 You know, and I would also put in
22 the record -- I mean, I've had other
23 issues down in federal court missing
24 deadline. It is par for the course. I
25 would want to supplement the record as

1 necessary on that.

2 This was scheduled. It was
3 noticed. Motions are unopposed.
4 Undisputed evidence is before the Court
5 justifying the granting of summary
6 judgment.

7 This case has been going on long
8 enough.

9 Or, back up. One final thing I
10 would say, last year when we filed
11 summary judgment, Mr. Fox did a 56(F)
12 affidavit saying, oh, I need more time
13 for discovery. That was granted in
14 July of 2019. And he has done nothing in
15 a year.

16 Correction. He did try to notice
17 the deposition of some of the attorneys
18 who are on some of these cases that we
19 said they may offer expert opinions.
20 That was got put aside. We're not
21 calling them as experts at this stage.
22 And other than that, he did nothing. He
23 did that in August a couple weeks ago.

24 But from July 2019 to July of 2020,
25 he did no discovery. Came in here and

1 said I need more time, I need more time.
2 And did nothing.

3 This case -- I think it's
4 meritless. I think it's frivolous.

5 But, regardless of that, we were
6 scheduled for a summary judgment which
7 has been pending since March 27th of this
8 year. They have not opposed it. It's an
9 unopposed motion with unrefuted evidence.
10 The Court should grant that motion. If
11 they have issues with the Court doing
12 that, they can take that up to the First
13 District. It's time for this case to
14 come to an end. Thank you.

15 THE COURT: Any response?

16 MR. GOODIN: Your Honor, if I could
17 respond briefly. On the record, Steve
18 Goodin on behalf of the plaintiff.

19 And, again, Your Honor, I'm not
20 ering -- this is by way of mitigation,
21 not an excuse.

22 I want to try to put a little
23 context, I think, to what has occurred
24 here.

25 I just learned of the gravity of

1 the situation, frankly, yesterday. I did
2 write the e-mail about it not making our
3 calendar, which probably sounds on par
4 with the dog ate our homework.

5 But what occurs and how our firm
6 always has operated is we use an
7 electronic calendar. For whatever
8 reason, as we learned of the telephone
9 conference back in June, for whatever
10 reason, none of the dates relating to
11 this case were docketed on our internal
12 calendar, which I follow every day.
13 That's why I was unaware of the original
14 call. For some reason, this just was not
15 docketed.

16 We're trying to figure out why or
17 how that happened. I have an assistant
18 who does that. Brian has an assistant.
19 It just did not happen.

20 So, again, our -- I mean, I
21 apologize for wasting the Court's time on
22 all of this and for -- I would be upset
23 if I were in your shoes as well. And I'm
24 not very happy about how this went down
25 myself either.

1 In terms of where this case is,
2 Your Honor, this is part of a larger
3 dispute, as the Court knows.

4 We were on the phone yesterday with
5 Magistrate Judge Bowman in the Southern
6 District. She has ordered the City of
7 Madeira and Mr. Oppenheimer to mediate
8 the cases pending in the Southern
9 District which is sort of, in our view,
10 part and parcel of this one.

11 We are hopeful, after having
12 discussed this with our client
13 representative last night and this
14 morning, there might be a potential
15 settlement in that matter.

16 Your Honor, what I would
17 respectfully request is given these
18 bizarre circumstances, that the Court
19 stay the ruling today and allow us to
20 mediate and hopefully talk about a global
21 or omnibus resolution with Magistrate
22 Litkovitz who is going to be the mediator
23 in this matter. We expect to have the
24 mediation -- she told us by the end of
25 the year, but we're hoping maybe even

1 pretty soon.

2 After talking about this matter,
3 again, with our client this morning, we
4 do think that there's a pretty common
5 sense of resolution to this.

6 And I will put that all on the
7 record, given that we still need to
8 discuss it all with counsel.

9 But there's been significant
10 movement on the part of our client, Your
11 Honor, in terms of resolving these
12 matters overall. As the Court can see
13 from the pleadings, the issue is just the
14 extent of what we view as frivolous and
15 expensive litigation that's been directed
16 at Madeira. We're trying to find some
17 other means of dealing with some of these
18 matters, rather than coming to court all
19 the time.

20 So, again, I guess in sum, Your
21 Honor, we have no real excuse. All I can
22 tell you is somehow administratively
23 these dates were not docketed. We would
24 obviously -- had I got my typical
25 reminders that we would gotten, we would

1 have had everything filed.

2 Also, I'm not trying to -- we're
3 certainly in no position to throw mud.
4 But my understanding is after having gone
5 back and looked at the pleadings in the
6 last 48 hours, there are some outstanding
7 issues with discovery. There are -- we
8 haven't seen many documents back that --
9 some of them, our client truly believes
10 that there are some documents that
11 Mr. Oppenheimer has in his possession
12 that would be relevant to a summary
13 judgment inquiry.

14 We really do feel that this is not
15 a case that is ripe for summary judgment
16 based on the facts. I think there's a
17 huge factual questions to whether or not
18 independent reasonable grounds, as is
19 required under the statute, filed on
20 these cases.

21 But, Your Honor, again we would
22 tender our apology on behalf of our
23 client and on behalf of the firm. It's
24 not the client's fault. This is some
25 sort of original internal Graydon, Head,

1 & Ritchey situation. And that would be
2 our submission, Your Honor.

3 We appreciate the Court taking the
4 time to hear this. And, again, we do
5 tender a sincere apology before the
6 Court.

7 MR. HARTMAN: If there was an issue
8 with scheduling back in June, obviously,
9 nothing -- no follow-up occurred to make
10 sure it didn't happen again. This isn't
11 the first time.

12 It happened in June on that
13 telephone conference. If that happened
14 to me and there was a scheduling -- I
15 would make sure what we just agreed to in
16 June in terms of scheduling made the
17 calendar.

18 And the other thing, Mr. Goodin
19 didn't realize that it relayed to the
20 court with respect to the telephone call
21 yesterday with Magistrate Judge Bowman
22 was nobody called in from the City of
23 Madeira in that case either.

24 It took the court down there trying
25 to call Mr. Fox because he didn't call

1 in. They have a call-in number. He
2 didn't call in. They tried to call him,
3 couldn't get ahold of him. I gave him
4 Mr. Goodin's number. They finally got
5 ahold of Mr. Goodin and he called in.

6 And during that telephone
7 conversation, Magistrate Judge Bowman
8 relayed to Mr. Goodin that the City of
9 Madeira has missed deadlines repeatedly
10 in that case. Judge Bowman said
11 repeatedly missed deadlines. I have cut
12 them breaks. And this was a continuation
13 of that process. And she was annoyed at
14 continual missed deadlines in that case.

15 And I would want to supplement the
16 record if we go forward, which I don't
17 think we should, with all that history.
18 Because that shows -- you know, we're now
19 past the deadline. Not only do they got
20 to show good cause, they've got to show
21 excusable neglect. Mr. Goodin just said
22 there is no excuse; therefore, their
23 error cannot be excusable neglect. And
24 this is so systemic. It's not excusable
25 neglect. It's just ignoring everything,

1 ignoring deadlines in this case and in
2 other cases.

3 You know, oh, we want to put it off
4 so we can try this mediation, which is --
5 well, one of the reasons we scheduled
6 this case for trial in November, if the
7 court remembers during that phone
8 conference, I'm running for judge.

9 THE COURT: Right.

10 MR. HARTMAN: And we originally
11 were looking early 2021. I said, hey, if
12 I get elected, knock on wood,
13 Mr. Oppenheimer is going to be back at
14 square one with new counsel. It's going
15 to extend the case further. And that's
16 all they're trying to do now is argue
17 the -- let's push this out and see what
18 happens with the election and get it
19 delayed. This case has been going on
20 long enough. They asked for extension of
21 discovery a year ago, did nothing.

22 In terms of documents, they never
23 identified the specific documents that
24 they believe are relevant or apportioned
25 with discovery consistent with Rule 26.

1 They're wanting documents dealing with
2 his financial arrangements on his
3 website. And I've asked, tell me why
4 that's relevant. Tell me why that is.

5 They won't. It's just you haven't
6 given us any documents, period. Well,
7 part of the exchange is what's -- here is
8 why I think your objections are
9 unfounded, here is why I think these
10 are -- I have never -- I have been
11 begging for that for over a year. I have
12 never gotten that.

13 Now the 11th hour we get this, oh,
14 we did file a Motion for Summary
15 Judgment. We thought it was due today,
16 we just don't have it ready to be filed
17 today.

18 This case has to come to an end.
19 Mr. Oppenheimer -- you know, he apologize
20 to the Court. He never apologized to
21 Mr. Oppenheimer for constantly dragging
22 him down here on this stuff, on these
23 missteps.

24 But this case, we have tendered
25 it -- they actually knew what the Summary

1 Judgment Motion was a year and a half ago
2 when we filed it and then filed a 56(F)
3 motion. Fine. The Court granted. And
4 they're not still ready to respond.

5 Your Honor, I would ask the Court
6 to grant the Summary Judgment Motion.
7 It's supported. We have expert testimony
8 unrefuted. They've not even identified
9 an expert.

10 THE COURT: What is your position,
11 Mr. Hartman, on the Magistrate Judge
12 ordered to mediate as far as -- obviously
13 this is a state court case and those are
14 federal court cases. And I know that in
15 their mind they think, boy, wouldn't it
16 be wonderful to have a global resolution.
17 What is your position?

18 MR. HARTMAN: That may be the end
19 result there. But we're here today on
20 this motion -- unopposed Motion for
21 Summary Judgment.

22 The federal case that mediation was
23 ordered is a First Amendment sign
24 regulation speech case. And that's what
25 we're trying to get resolved. That's

1 what mediation has been ordered.

2 If this case and another case get
3 pulled into it, it does. But we're here
4 in our day in court. Today was our day
5 in court for the Summary Judgment Motion
6 that we put time, money, and energy in.

7 THE COURT: Yeah.

8 MR. HARTMAN: And we're entitled to
9 it. As a matter of law, we are entitled
10 to it.

11 It's time for this case to come to
12 an end. We're still mediating that case
13 and any other case -- and that other case
14 that's going on. If that gets pulled
15 into it, that mediation is simply over a
16 First Amendment sign case. That's it.

17 I'd ask -- we've gone through it.
18 It's been pending since March. They knew
19 about it. We knew the scheduling. No
20 excusable neglect has been demonstrated.

21 THE COURT: No.

22 MR. HARTMAN: I mean, therefore --

23 THE COURT: I want the record to be
24 clear. I 100 percent -- as Mr. Goodin
25 pointed out, this is not Madeira's fault.

1 This isn't your client's fault.
2 It's your fault. So by no stretch of the
3 means would I hold anything against your
4 clients.

5 What I won't have happen in any
6 case that I deal with when I can avoid it
7 is have a case decided on a technicality.
8 It does nothing but create issues for
9 appeal and reasons for everybody to be
10 dragged back into court a year from now
11 for a whole do-over which nobody wants.

12 I'm not going to penalize the City
13 of Madeira for their lawyers' failure.
14 But I'm also not going to reward it with
15 continuances and entertaining what
16 certainly seems to me to be frivolous
17 Motions to Compel, particularly in light
18 of the e-mail that has been read to me in
19 court here today. I'm frankly a little
20 bit surprised at the audacity at this
21 filing at 4:00 yesterday. And then any
22 Motion for Continuance today in light of
23 the attorneys' failures here.

24 What I will do is allow the City of
25 Madeira to file a response to their

1 Motion for Summary Judgment by Monday at
2 close of business. We will not have oral
3 argument because of the time frame. We
4 are in a box. And I am dead set that if
5 there is going to be a trial, that it get
6 tried on that November 14th date.

7 Your client is owed that, your
8 representation. You've been on this case
9 since day one. That date is not moving
10 if there is that date. Understood?

11 So as much as oral argument is
12 always welcome to the Court, this will be
13 the one time that I would deny that
14 request.

15 Now, do you anticipate a response?
16 You don't know until you see it. Got it.
17 That's fair.

18 MR. HARTMAN: Yeah, I've got
19 something -- a major filing up in Butler
20 County on October 6th or 7th that I'm
21 starting to work on now. I'm hoping to
22 get that done. Give me -- tell you what,
23 if I can take a look at it, if I call
24 your clerk or e-mail your clerk and say,
25 yes, I'd like to reply, I'll get

1 something done in two or three days.

2 THE COURT: Yes.

3 MR. HARTMAN: If not, I will just
4 say it's fine as is.

5 THE COURT: Okay. So Monday the
6 5th. Are we clear? Do you need my court
7 reporter to run over and make a
8 transcript of that for you? You can put
9 it in your own calendar.

10 MR. FOX: (Nodding head.)

11 THE COURT: Monday the 5th is your
12 response. I expect to hear by the end of
13 next week, Mr. Hartman, if you're going
14 to exercise the opportunity.

15 We have a pretrial on October --
16 I'm sorry. Ms. Hayes?

17 MR. HARTMAN: 29th.

18 THE CLERK: Yes.

19 THE COURT: Okay. And then the
20 trial is the 14th?

21 MR. HARTMAN: 16th.

22 THE COURT: 16th. I said the 14th.
23 Okay. All right. So you may not have a
24 decision by the pretrial.

25 And I apologize, Mr. Hartman, for

1 that. And I mean that.

2 MR. HARTMAN: If I can put two
3 things on the record.

4 THE COURT: Sure.

5 MR. HARTMAN: I just want to make
6 sure the Court does realize our objection
7 to the extension of time. I think under
8 Rule 6 -- and I can't remember the
9 division -- not only must good cause be
10 shown but excusable neglect in order to
11 extend the deadline after the deadline.
12 That has not been made, I don't believe,
13 in this case.

14 Mr. Goodin even acknowledged there
15 is no excuse. So I don't think, with all
16 due respect, that is an issue I want to
17 preserve on the record.

18 THE COURT: I understand.

19 MR. HARTMAN: I don't think the
20 Court should have granted that motion.

21 I will tender to the court reporter
22 as an exhibit that e-mail exchange.

23 THE COURT: Please do. For
24 clarification, close of business on
25 Monday is 4:00 p.m., not 10:00. 4:00

1 p.m. Monday.

2 MR. GOODIN: Understood, Your
3 Honor.

4 THE COURT: All right. The Motion
5 to Compel on discovery, what do you want
6 to do on that?

7 MR. FOX: Your Honor, not
8 withstanding the -- his indication is not
9 going to use or wasn't going to raise it
10 as an issue, we still need that for
11 purposes of preserving the record because
12 there's some case law out that there says
13 that in order to utilize those responses
14 in responding to a Motion for Summary
15 Judgment or using that as evidence, it
16 has to be verified.

17 As far as the requests have been
18 made, I can evaluate the requests that
19 were made and narrow the -- and I tried
20 to do that in the Motion to Compel. I
21 tried to narrow the very specific items
22 that we did need that would be helpful
23 and that were not something that we could
24 ordinarily obtain, that weren't in the
25 custodian's order or possession of that

1 only Mr. Oppenheimer would have. So I
2 can connect with opposing counsel and we
3 can work on a plan to get that together.

4 THE COURT: You all need to get
5 back to the Court if there's an issue
6 that you guys can't remedy because
7 we're -- if this case goes to trial, it
8 is going November 16th.

9 MR. FOX: Understood.

10 MR. HARTMAN: If I may just on that
11 Motion to Compel.

12 Firstly, in terms of the
13 verification, we've already indicated
14 we'll waive the issue. There is no -- if
15 there is any error, it's invited error on
16 our part so we couldn't even raise it as
17 an issue. So I think that argument falls
18 apart.

19 In terms of the documents, again, I
20 don't know what specific documents are
21 relevant. Like I said, some of the
22 things they want, Your Honor, we believe
23 are protected by a First Amendment
24 privilege. This Madeira Messenger which
25 is a website that Mr. Oppenheimer runs,

1 all communications concerning that, all
2 communications with the press. They want
3 communications that we've had with the
4 news media about Madeira. That's First
5 Amendment privilege. Even the Court
6 could not order that -- that has nothing
7 to do with the underlying litigation
8 cases that are supposedly the foundation
9 for the claim that they brought. And I
10 think we're over the two years, so --

11 I would point out just as a
12 correction, I've not been on the case
13 since the beginning. I was on the bench
14 and then I came in during the middle of
15 the case. Just to clarify something for
16 the Court.

17 MR. FOX: Thank you, Your Honor.
18 There was also an indication in their
19 discovery responses that they were going
20 to provide documents on some of the
21 responses. But those weren't provided.
22 So I'm not --

23 MR. HARTMAN: I think both of those
24 were public records that are available on
25 the Clerk's website, but I'll print them

1 out and send them to you. If that's what
2 we have to do, I will do that.

3 THE COURT: I appreciate it.

4 MR. FOX: And then in addition to
5 that, drafts of content. And so the
6 website that the defendant has is what it
7 is online. But that doesn't mean that
8 there weren't posts that were put on
9 there and pulled off that we would not
10 have access to.

11 Those would be the sorts of
12 things -- the sorts of documents that we
13 would like access to.

14 THE COURT: Posts that other people
15 put on that website, or that he put on
16 the website?

17 MR. FOX: That the defendant put
18 on.

19 THE COURT: That the defendant put
20 on the website and then removed from the
21 website?

22 MR. FOX: Correct, Your Honor.

23 MR. HARTMAN: Firstly, I'm not sure
24 why anything on the website is relevant
25 to whether or not he's a vexatious

1 litigator.

2 There is an indication from my
3 client nothing has been pulled off,
4 either before or after the litigation.

5 THE DEFENDANT: So I put -- shall
6 I --

7 MR. HARTMAN: Has anything been
8 taken down?

9 THE DEFENDANT: Practically nothing
10 that I can recall. I actually just
11 quickly, I'd like to say on Facebook
12 yesterday, I stated that everything on
13 the website that's been there is still
14 there for this reason. I left everything
15 on the website because I consider it
16 evidence according to the City.

17 MR. HARTMAN: Any drafts of
18 that that might have been there.

19 MR. FOX: I'm aware of at least one
20 specific incident where the defendant
21 included an analogy about a teacher
22 ignoring a rape allegation and that being
23 analogous to something that was going on
24 with what the city manager was doing
25 or -- and that's the sort of thing --

1 that was being scrubbed from the website
2 or removed from the website while we had
3 access to that that's not the --

4 THE COURT: What would that have to
5 do with him being a vexatious litigator?

6 MR. FOX: It corroborates -- the
7 website contains lots of descriptions
8 about the litigation and his motivations
9 for filing them and the other allegations
10 that surround it.

11 So it gives corroboration to some
12 of the essential elements of the case.

13 MR. GOODIN: Your Honor, at this
14 point, if I may suggest -- and in respect
15 to Counsel Hartman, perhaps it would be
16 best just to hold the Motion to Compel in
17 abeyance at this point. I think we can
18 have some discussions.

19 And I know we're not in a position
20 to ask for anything, but I think it might
21 behoove us if we could have access to
22 your jury room to talk with counsel after
23 this for a bit I think, while we're all
24 here, to maybe talk about some sort of
25 common sense path forward.

1 THE COURT: Great. Very good.

2 I'll do that. You have the full
3 use of my jury room and my courtroom.
4 I'm down the hallway if you all need me.
5 And the -- my jury is in the Covid room
6 so I'm not in here.

7 So Monday 4:00. You may or may not
8 have a decision by the pretrial. And if
9 I don't hear from you all, great.

10 MR. GOODIN: Thank you, Your Honor.

11 MR. HARTMAN: Thank you, Your
12 Honor.

13 (The proceedings concluded.)

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CERTIFICATE

I, Andrea Hodapp, the undersigned,
a Registered Professional Reporter for
the Hamilton County Court of Common
Pleas, do hereby certify that at the same
time and place stated herein, I recorded
in stenotype and thereafter transcribed
the within 29 pages, and that the
foregoing Transcript of Proceedings is a
true, complete, and accurate transcript
of my said stenotype notes.

IN WITNESS WHEREOF, I hereunto set
my hand this 8th day of February, 2021.

ANDREA HODAPP
Registered Professional Reporter
Court of Common Pleas
Hamilton County, Ohio