

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED (first two cover pages of affidavit unnumbered, iii-lxlii) IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX (Appendix Pages are numbered 1-655) PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

EXHIBIT

AE

EXHIBITS A-AAAE IN SUPPORT OF CLIFTON JACKSON ENCLOSED AFFIDAVIT AND APPENDIX PREPARED MARCH OF 2016 OF A DETAILED TIME LINE OF FACTUAL EVENTS BETWEEN JUNE 14th, 2011 AND OCTOBER OF 2015 TO THE BEST OF MY LAYMEN LEGAL ABILITIES.
THIS EXHIBIT "AE" IS REFERENCED IN ¶ 83 not limited too.

K) A copy of the court documented docket sheet from June 2011 to date that will show how the time has been charged per every court appearance rescheduling etc.

Maricella, please mail me the above immediately to the following address.

Clifton A. Jackson
Erie County Holding Center
40 Delaware ave
Buffalo, NY 14202

Thank you in advance. However please note I will continue to correspond with the office via emails as I have been since 2011. I need hard copies of the requested materials because all my legal materials were destroyed by only lord knows who when I was recently arrested.

Dear Mr. Bradley,

With all due respect, again, why have you not responded to any of my emails basically since mid August 2012?

Every email I've sent you, it's contents speaks volumes in all phases from the date of my initial arrest June 14, 2011 throughout the time frames of on or around November 4, 2011, the date actual suppression motion was filed. All time in the dates mentioned above should be chargeable to the people.

Throughout on or around August 2012, the actual date the suppression commenced,

There were many court dates and appearances, only to be rescheduled because of the people's un readiness to proceed, again between November 4, 2011 in early August 2012.

Including but not limited to, the time frames of mid August of 2012 throughout on or around September 29, 2012 the date the actual suppression motion decision was rendered, again with the additional three or four more court appearances, only to be rescheduled time after time.

Now from the time frames from late September 2012 until basically to date, possibly excluding a little more less in ten days for the reconsideration motion submission and decision of the same, the people's time resumed from on or around November 4, 2011.

Although the legalities exist between June 14, 2011 and August 2012 (possibly as far back to the suppression hearing decision and possibly the reconsideration motion decision the latter part of 2012) possibly violation my constitutional protections,

The defendant from June 14, 2011 to date should have not been charged. For the stoppage of time for any reasons, and

Mr. Bradley, that's what you, my legal counsel have always led me to believe, besides the just in legal time perimeters per the legalities of a suppression hearing, in addition to how the clock stops and start of the same.

In fact the defendant has clearly been pushing a temple of this case throughout misconception. It has been the people's case in writing in long time frames of silence, sum totally 21 months in counting to date.

Mr. Bradley between the dates mentioned above, you mailed me a correspondence dated October 24, 2012, in which I responded to that correspondence in email soon after. In which your office confirmed receipt the same, in addition to confirm and receipt to ever other email I ever sent to your office.

I've only received via email from your office, court appearances notifications from your secretary, a reconsideration motion draft, communications sum totally a conflict ion of the same the date you submitted the reconsideration motion late 2012, and finally the one page, one sentence denial of the reconsideration motion late 2012. Nothing else via emails or U.S. postage.

Once the suppression hearing commenced it was initially adjourned August 2012, you stated to me the judge wanted case law on rental vehicles. You submitted fed motion without my input or knowledgo. Once you brought this to my attention, I started emailing you regarding since August 15, 2012, directly requesting you to amend the same, only to be ignored, but your secretary confirmed receipt of all my emails sent to you immediately regarding. My issue with this was and still is, I acknowledge the fact you are a great lawyer and although you submit the paperwork, however you or your office have not solely compared any of the motions presented this far, however your ego has surfaced when my additional legal community have showed face.

Although many questions exists and where raised to you the best of my knowledge via a rath of emails etc., besides the mention above, I have not heard from you period, although me or a family member continue to call your office regularly for undates and possible court activites relevant.

In addition but not limited to, my last two court appearances where where heavily found-dated on plea attempts, where no actual plea offers wherever clearly on the table, it was or appeared to be some sort of check to see where I stood plea wise, and it's been back and forth this way my last two court appearances, and although I declined both attempts from June 2011 to date, I've maintained readiness for trial.

The plea attempts mentioned were the only conversations of a plea ever mentioned by either side.

Again late 2012, I emailed you several times , again confirmations received, after the reconsideration denial only to be ignored again until a court date notification for march 18, 2013 via email of a Pretrial hearing from your office.

Mr bradley, what about thee draft of the motion(s) for I'm timely prosecutions and all the many other grave legal issues that exists via this case, along with any other motions that should possibly be followed.

What about responding to your clients emails as they are sent regarding, that's full of substance, concerns etc.. per the proper representation. The accumulation sum totally the abundance of, cannot be answered in one email, ignored and or be overshadowed.

Prepare whatever paperwork you must, to have me produce at court, because for no reason(s). do i want the time clock to stop on the people's case, although the people's are clearly in speedy trial violations , as well as the many others grave issues that exist relevant this case in a whole.

Please regarding to any and all responses, always first and foremost send a copy to my email.

Thank you in advance for your time and attention concerning, and anticipation of your prompt response, not only of this email, I am still awaiting your prompt response of my last two emails sent to you immediately after the reconsideration motion denial. The two emails prior to the recent court notification the prior to the most recent court notification of march 18, 2013.

Sincerely,
Clifton a Jackson

Thank you again!
Clifton A. Jackson

Sent from my iPhone

On Mar 6, 2013, at 10:41 AM, "Maricelia" <maribradleylaw@centurytel.net> wrote: