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March 2, 2017

Clifton A. Jackson #A652-163  
Lake Erie Correctional Institution  
501 Thompson Road / P.O. Box 8000  
Conneaut, OH 44030

Alexander Jemison

Buffalo, NY

Amber Powlak

Buffalo, NY

Mason Jackson

Buffalo, NY

Moneh Fuller

Buffalo, NY

Roman Motley

Buffalo, NY

Elijah Fuller

Buffalo, NY

Lorrionna Jackson

Buffalo, NY

April Burns

Detroit, MI

Angel Burns Myles

Detroit, MI

Brenda Jackson

Detroit, MI

Jamel Pittman

Detroit, MI

Ohio State Highway Patrol  
1970 West Broad Street  
P.O. Box 182074  
Columbus, OH 43218-2074

State Trooper Christopher Beyer  
1970 West Broad Street  
P.O. Box 182074  
Columbus, OH 43218-2074

State Trooper Michael Trader  
1970 West Broad Street  
P.O. Box 182074  
Columbus, OH 43218-2074

State Trooper K-9 Argo  
1970 West Broad Street  
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Elyria, OH 44035

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Edward Zaleski, Retired Judge  
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Elyria, OH 44035

John R. Miraldi, Judge  
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Elyria, OH 44035

Leah H. Wolfe, Esq.  
Assistant U.S. Attorney  
303 Marconi Blvd., Ste. 200  
Columbus, OH 43215

Re: Jackson, et al. v. Ohio State Highway Patrol, et al.  
United States District, Southern District of Ohio,  
Eastern Division  
Case No. 2:17-cv-163  
Our File No. 5955-23130C

Gentlepeople:

Enclosed please find copies of the following pleadings which we have caused to be filed with the Court today in the above-captioned case:

1. Notice of Appearance of Counsel on behalf of defendant Paul A. Griffin; and
2. Defendant Paul A. Griffin's Answer and Affirmative Defenses.

Very truly yours,

**REMINGER CO., LPA**

*Acacia M. Perko*

Acacia M. Perko

AMP/sf  
Enclosures (2)

# Legal Mail Log

Institution: LAECI						
Date Received by Institution	Inmate Name	Inmate Number	Lock Assignment	Sender's Name & Address	Inmate's Signature of Receipt	Date of Receipt
03/06/2017	HUFFORD	A-691063	SA67	CP CRT JUV DIVISION 9300 QUINCY AVE CLEVELAND 44106		
03/06/2017	MYERS X2	A-663259	SB27	CLERK OF COURTS MAHONING CNTY CRTHSE YOUNGSTOWN 44503		
03/06/2017	JACKSON	A-652163	SB93	US DISTRICT CRT 85 MARCONI BLVD COLUMBUS 43215	<i>Clifford Jackson</i>	3/6/17
03/06/2017	JACKSON	A-652163	SB93	LORAIN CNTY PROS 225 COURT ST ELYRIA 44035	<i>Clifford Jackson</i>	3/6/17
03/06/2017	JACKSON	A-652163	SB93	REMINER ATTY AT LAW 200 CIVIC CENTER DR COLUMBUS 43215	<i>Clifford Jackson</i>	3/6/17

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CLIFTON A. JACKSON, <i>et al.</i> ,	)	
	)	CASE NO. 2:17-cv-163
<i>Plaintiffs,</i>	)	
	)	
-vs-	)	CHIEF JUDGE EDMUND A.
	)	SARGUS, JR.
OHIO STATE HIGHWAY	)	MAGISTRATE JUDGE JOLSON
PATROL, <i>et al.</i> ,	)	
	)	NOTICE OF APPEARANCE OF
<i>Defendants.</i>	)	COUNSEL

NOTICE OF APPEARANCE OF COUNSEL

Please take notice that Acacia M. Perko (0087950) of Reminger Co., L.P.A. hereby enters her appearance as counsel for Defendant Paul A. Griffin in the above captioned matter.

Respectfully submitted,

/s/ Acacia M. Perko  
Acacia M. Perko, Esq. (0087950)  
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Email: aperko@reminger.com  
*Counsel for Defendant, Paul A. Griffin*

**CERTIFICATE OF SERVICE:**

I certify that on March 2, 2017, I filed the foregoing Answer using the Court's CM/ECF system and I certify that on the same day a copy of the foregoing was sent via regular U.S. Mail to:

Clifton A. Jackson #A652-163  
Lake Erie Correctional Institution  
501 Thompson Road / P.O. Box 8000  
Conneaut, OH 44030  
*Plaintiff*

Amber Powlak  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

Moneh Fuller  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

Elijah Fuller  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

April Burns  
[REDACTED]  
Detroit, MI [REDACTED]  
*Plaintiff*

Brenda Jackson  
[REDACTED]  
Detroit, MI [REDACTED]  
*Plaintiff*

Ohio State Highway Patrol  
1970 West Broad Street  
P.O. Box 182074  
Columbus, OH 43218-2074  
*Defendant*

Alexander Jemison  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

Mason Jackson  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

Roman Motley  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

Lorrionna Jackson  
[REDACTED]  
Buffalo, NY [REDACTED]  
*Plaintiff*

Angel Burns Myles  
[REDACTED]  
Detroit, MI [REDACTED]  
*Plaintiff*

Jamel Pittman  
[REDACTED]  
Detroit, MI [REDACTED]  
*Plaintiff*

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Columbus, OH 43218-2074  
*Defendant*

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Columbus, OH 43218-2074  
*Defendant*

State Trooper K-9 Argo  
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*Defendant*

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*Defendant*

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*Defendant*

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*Attorney for United States of America,  
substituted party for Special Agent Geno  
Taliano and Special Agent Caitlin  
Szczepinski*

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*Defendant*

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*Defendant*

*/s/ Acacia M. Perko*

Acacia M. Perko, Esq. (0087950)

*Counsel for Defendant, Paul A.  
Griffin*