## IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO CIVIL DIVISION

## CASE NO. 17 CV 616 (JUDGE)

CLIFTON JACKSON, et al.

Plaintiffs,

SEPARATE ANSWER OF PAUL MANCINO, JR

vs.

OHIO STATE HIGHWAY PATROL et al.

Defendants.

- Now comes defendant, Paul Mancino, Jr., for his answer to the complaint and denies, for want of knowledge, all of the allegations contained in paragraphs 1 through 30 of the complaint.
- 2. Defendant denies the allegations contained in paragraphs 32 through 49 of the complaint.
- 3. Defendant states that the complaint fails to set forth a claim upon which relief may be granted.
- 4. Defendant states that the plaintiff, who is a non-attorney, is practicing law as he apparently represents a number of additional plaintiffs in this case who are named as plaintiffs, he is not licensed to practice law.
- 5. Defendant states that the complaint is barred by the statute of limitation, laches and unclean hands.
- 6. Defendant further states that the complaint fails to comply with the Ohio Rules of Civil Procedure as it is unduly prolix and basically unintelligible.

- 7. Defendant further states that he is not an agent of the state but is involved in the private practice of law in Cuyahoga County, Ohio.
- Moreover, defendant further states that this matter is improperly venued in Franklin County, Ohio as the undersigned has performed any actions in Franklin County, Ohio and any contact with the defendant was from Cuyahoga County, Ohio.
- 9. Defendant further reserves the right to raised any additional defenses that may appear during the course of the proceedings.

WHEREFORE defendant prays that the case be dismissed and that the defendant recover his cost together with reasonable attorney fees for this frivolous filing in accordance with Rule 11 of the Ohio Rules of Civil Procedure.

Attorney for Defendant Paul Mancino, Jr.

75 Public Square, #1016 Cleveland, Ohio 44113-2098 (216) 621-1742

## **SERVICE**

A copy of the foregoing Separate Answer of Defendant Paul Mancino, Jr., has been sent Clifton A. Jackson, #A652-163, 501 Thomson Road, P.O. Box 8000, Conneaut, Ohio 44030, on this 1746 day of February, 2017.

Attorney for Defendant Paul Mancino, Jr.

Clifton Jackson, Answer 1-30-17