

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.

8. 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.



PAUL MANCINO, JR. #0015576
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 17th day of **February, 2017**.



s/paul mancino, jr
PAUL MANCINO, JR. (0015576)
Attorney for Defendant
Paul Mancino, Jr.