

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

CLIFTON A. JACKSON, et al., :
Plaintiff(s), : Case No. 2:17-cv-163
vs. : CHIEF JUDGE SARGUS
OHIO STATE HIGHWAY PATROL, et al., : MAGISTRATE JUDGE JOLSON
Defendant(s). :

PLAINTIFF(S)' REQUEST TO FREEZE ALL DEFENDANT(S)' ASSETS
PURSUANT TO FED.CIV.R. 64

Now comes the Plaintiff(s) and respectfully moves this Honorable Court pursuant to Fed.Civ.R. 64 to issue an order seizing all properties of Defendant(s) [Freeze Assets] for the following reasons:

Fed.Civ.R. 64 states:

(a) Remedies Under State Law—In General. At the commencement of and throughout an action, every remedy is available that, under the law of the state where the court is located, provides for seizing a person or property to secure satisfaction of the potential judgment. But a federal statute governs to the extent it applies.

(c) Specific Kinds of Remedies. The remedies available under this rule include the following—however designated and regardless of whether state procedure requires an independent action:

- arrest;
- attachment;
- garnishment;
- replevin;
- sequestration; and
- other corresponding or equivalent remedies.

WHEREFORE, Plaintiff(s) has a civil action pending at the present time, which is requesting damages of compensatory, punitive, and monetary against each Defendant named as a party to their complaint, Plaintiff(s) has also demanded a jury trial of the matter in dispute. Plaintiff(s) pray that they will be granted the relief herein sought to secure satisfaction of the potential judgment.

Respectfully submitted,



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

PLAINTIFF(S) CLASS MEMBERS

CERTIFICATE OF SERVICE WITH INSTRUCTIONS

Plaintiff(s) hereby certify that due to their indigency the original and one copy of the foregoing Plaintiff(s)' Answer to any and all Defendant(s)' Motion to Dismiss for Lack of Subject Matter Jurisdiction "and/or" Fed.Civ.R. 12(b)(1) or 12(b)(6) because Plaintiff(s) have Plead Facts which, if proven, would Entitle them to Relief, Dismissal is Inappropriate, and both parties have Demanded a Jury Trial to Settle their Controversy; Plaintiff(s)' Memorandum in Support of Plaintiff(s)' Answer to any and all Defendant(s)' Motion to Dismiss for Lack of Subject Matter Jurisdiction "and/or" Fed.Civ.R. 12(b)(1) or 12(b)(6) because Plaintiff(s) have Plead Facts which, if proven, would Entitle them to Relief, Dismissal is Inappropriate, and both parties have Demanded a Jury Trial to Settle their Controversy; and Plaintiff(s)' Request to Freeze all Defendant(s)' Assets Pursuant to Fed.Civ.R. 64 was sent by regular U.S. Mail to: Office of the Clerk, UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF OHIO, 85 Marconi Boulevard, Columbus, Ohio 43215 this 11th day of April, 2017. Because of the Plaintiff(s) indigency, they are respectfully requesting the Clerk to serve a copy of the foregoing motions on each Defendant and their respective counsel to the same addresses as on Page 32.