



COURT OF CLAIMS OF OHIO

The Ohio Judicial Center
65 South Front Street, Third Floor
Columbus, OH 43215
614. 387.9800 or 1.800.824.8263
www.cco.state.oh.us

STATEMENT OF THE EXISTENCE OF CONNECTED ACTIONS,
REQUIRED BY L.C.C.R. 15(C)
MAILED BY THE CLERK OF THE COURT OF CLAIMS
ON MARCH 5, 2013

WILLIAM RUSSELL

Plaintiff

V.

CLEVELAND STATE UNIVERSITY

Defendant

Case No. 2013-00138

ORIGINAL

2013 MAR 29 AM 11:04

FILED
COURT OF CLAIMS
OF OHIO

I certify that to the best of my knowledge, the following is a comprehensive statement of the existence of all connected cases, claims, or applications, which are based on essentially the same facts as those alleged in the complaint or petition for removal of the above-captioned Court of Claims case, and which are pending in any other court, bureau, board, commission, or agency.

PART I. Statement of Existence of Connected Court Cases. The following is a statement of the existence of all cases connected to the above-captioned case which are pending in courts other than the Court of Claims of Ohio. (If there are no cases connected to the above-captioned case pending in courts other than the Court of Claims of Ohio, please indicate in blank 7. If more than one case is pending in other courts, please provide all the information requested concerning those cases on an additional sheet.)

1) The name of the court in which the connected case is pending is: _____

2) The named defendants are:

A) _____

B) _____

C) _____

D) _____

E) _____

(Any additional defendants should be listed on an additional sheet.)

3) The case number of the connected case is: _____

4) The caption of the connected case is: _____

5) The initial filing date of the connected case was: _____

6) The name of the judge assigned to the connected case is: _____

ON COMPUTER

7) There are no cases connected to the above-captioned Court of Claims case which are pending in any other court. (Check if true) X . (Note: This form must be completed and filed even if there are no cases connected to the above-captioned Court of Claims case pending in any other court.)

PART II. Statement of Existence of Connected CLAIMS OTHER THAN COURT CASES. The following is a statement of the existence of all claims connected to the above-captioned case which are pending in any bureau, board, commission, or agency other than a court. (If there are no claims connected to the above-captioned Court of Claims case pending in any bureau, board, commission or agency, please indicate in blank 13 below. If more than one connected claim is pending in any bureau, board, commission or agency, please provide all the information requested concerning those claims on an additional sheet.)

8) The bureau, board, commission, or agency in which the connected claim is pending is:

Name: E.E.O.C.

Address: 1240 E. 9th Street, Suite 3001

Cleveland, Ohio 44199

9) The claim number or other identifying number of the connected claim is: 532-2013-00469

10) The caption of the connected claim is: William Russell v. Cleveland State University

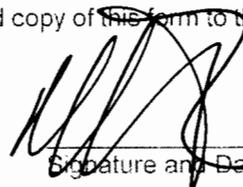
11) The initial filing date of the connected claim was: December 4, 2012

12) The nature of the connected claim is: employment discrimination and retaliation

13) There are no claims connected to the above-captioned Court of Claims case which are pending in any bureau, board, commission or agency. (Check if true) . (Note: This form must be completed and filed even if there are no claims connected to the above-captioned Court of Claims case pending in any bureau, board, commission or agency.)

I certify that I have read and understand L.C.C.R. 15(C) and the contents of this form. I understand that I am charged with a continuing duty to notify the Clerk of the Court of Claims if I file or learn of a case in any other court which is connected to the above-captioned action filed in the Court of Claims, or if I file or learn of a claim, action, or application for relief in any bureau, board, commission or agency which is connected to the above-captioned claim filed in the Court of Claims.)

I further certify that I have served a completed copy of this form to the Attorney General and all other parties pursuant to Civ. R. 5.

 3-28-13
Signature and Date

Mark D. Griffin, Esq.
Name

Thorman Hardin-Levine, Co., L.P.A.
Address

3100 Terminal Tower, 50 Public Square
 Cleveland, Ohio, 44113

7) There are no cases connected to the above-captioned Court of Claims case which are pending in any other court. (Check if true) X . (Note: This form must be completed and filed even if there are no cases connected to the above-captioned Court of Claims case pending in any other court.)

PART II. Statement of Existence of Connected CLAIMS OTHER THAN COURT CASES. The following is a statement of the existence of all claims connected to the above-captioned case which are pending in any bureau, board, commission, or agency other than a court. (If there are no claims connected to the above-captioned Court of Claims case pending in any bureau, board, commission or agency, please indicate in blank 13 below. If more than one connected claim is pending in any bureau, board, commission or agency, please provide all the information requested concerning those claims on an additional sheet.)

8) The bureau, board, commission, or agency in which the connected claim is pending is:

Name: E.E.O.C.

Address 1240 E. 9th Street, Suite 3001

Cleveland, Ohio, 44199

9) The claim number or other identifying number of the connected claim is: 532-2013-00467

10) The caption of the connected claim is: Steven Liss v. Cleveland State University

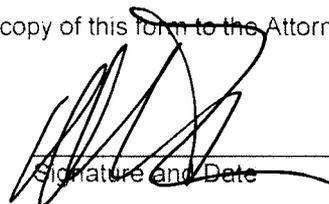
11) The initial filing date of the connected claim was: December 4, 2012

12) The nature of the connected claim is: employment discrimination and retaliation

13) There are no claims connected to the above-captioned Court of Claims case which are pending in any bureau, board, commission or agency. (Check if true) . (Note: This form must be completed and filed even if there are no claims connected to the above-captioned Court of Claims case pending in any bureau, board, commission or agency.)

I certify that I have read and understand L.C.C.R. 15(C) and the contents of this form. I understand that I am charged with a continuing duty to notify the Clerk of the Court of Claims if I file or learn of a case in any other court which is connected to the above-captioned action filed in the Court of Claims, or if I file or learn of a claim, action, or application for relief in any bureau, board, commission or agency which is connected to the above-captioned claim filed in the Court of Claims.)

I further certify that I have served a completed copy of this form to the Attorney General and all other parties pursuant to Civ. R. 5.

 3-28-13
Signature and Date

Mark D. Griffin, Esq.
Name

Thorman Hardin-Levine, Co., L.P.A.
Address

3100 Terminal Tower, 50 Public Square
 Cleveland, Ohio, 44113

REQUEST FOR INFORMATION PURSUANT TO L.C.C.R. 15(C)

Pursuant to Court of Claims Local Rule 15(C), effective January 1, 1984, the plaintiff or the plaintiff's attorney must complete the attached form entitled **STATEMENT OF THE EXISTENCE OF CONNECTED ACTIONS**. Please note that you have both an initial duty and a continuing duty to inform the Court of Claims of the existence of connected actions.

L.C.C.R. 15(C) states:

(C) Information concerning cases, claims based on essentially the same facts.

Upon the filing of an original complaint in which the demand for relief exceeds \$2,500.00 or a petition for removal, the clerk shall serve, by ordinary mail, a request for information about connected cases or claims (hereafter referred to as "request for information") upon the plaintiff's attorney or upon the plaintiff where plaintiff has no attorney. The clerk, in his discretion, may serve a request for information in other civil actions. The request for information shall, *inter alia*, require the plaintiff to state whether a case, claim, application, etc., based on essentially the same facts as the complaint or petition for removal filed in the court of claims, is pending in any court or bureau, board, commission or agency. The clerk shall draft the request for information and all necessary instructions for such form.

The plaintiff's attorney or the plaintiff shall complete the request for information form and file it with the court within twenty-eight days after the date the form was mailed by the clerk. The plaintiff's attorney or the plaintiff shall serve a copy of the completed form upon the attorney general and all other parties pursuant to Civil Rule 5. All other parties have the continuing duty to immediately inform the court in writing where the information stated in a request for information form is incorrect or incomplete and where there is a change in the status of the case, claim, application, etc., noted in a request for information form, or an additional case, claim application, etc., based on essentially the same facts as the complaint or petition for removal filed in the court of claims, is filed with any court or any bureau, board, commission or agency. The sanctions stated in Civil Rule 37 (B)(2) may be assessed for failure to timely comply with this rule.

INSTRUCTIONS

- 1) The form has two parts. Both parts **must** be completed and filed even if no connected actions based on essentially the same facts as those alleged in the complaint or petition for removal are pending in any other court, bureau, board, commission, or agency. (See blanks 7 and 13 of the form.)
- 2) File the **original** of the completed form at the following address within twenty-eight days after the date the form was mailed by the clerk:

Court of Claims of Ohio
The Ohio Judicial Center
65 South Front Street, Third Floor
Columbus, Ohio 43215
- 3) Serve a **copy** of the completed form upon the Attorney General at the following address:

Attorney General of the State of Ohio
Court of Claims Defense Section
150 East Gay Street, 18th Floor
Columbus, Ohio 43215-3130
- 4) Serve all other parties pursuant to Civil Rule 5.
- 5) Maintain a copy of the completed form for your records.
- 6) Style all pleadings, motions or other documents requiring captions with the caption used in the **STATEMENT OF THE EXISTENCE OF CONNECTED ACTIONS**.

If you have any questions, please contact the Court of Claims at (614)387-9800 or visit the court's website at www.cco.state.oh.us.

CERTIFICATE OF SERVICE

I hereby certify that on March 28th, 2013, a copy of the *Statement of the Existence of*

Connected Actions was served by U.S. Mail upon:

Attorney General of the State of Ohio
Court of Claims Defense Section
150 East Gay Street, 18th Floor
Columbus, Ohio 43215-3130

Cleveland State University
2121 Euclid Avenue
Cleveland, Ohio 44115



PETER HARDIN-LEVINE (0014288)

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3100 Terminal Tower

50 Public Square

Cleveland, Ohio 44113

Phone (216) 621-3500

Fax (216) 621-3422

Attorneys for Plaintiff William Russell



THORMAN HARDIN-LEVINE

March 28, 2013

Via Overnight UPS Delivery

The Ohio Judicial Center
Court of Claims of Ohio
65 South Front Street
Third Floor
Columbus, OH 43215

2013 MAR 29 AM 11:03

FILED
COURT OF CLAIMS
OF OHIO

Re: *Liss v. Cleveland State University*
Case No.: 2013-00138

Dear Sir/Madam:

I enclose the original and two copies of the *Statement of Existence of Connected Actions*. The original is for filing with the Clerk and the two other copies we would like to have time-stamped. Please return the time-stamped copies to me in the enclosed self-addressed postage-prepaid envelope.

R.D.

Thank you for your attention to this matter. Please do not hesitate to call me should you have any questions.

Sincerely,

Lesa Liston
Paralegal
lleston@thllaw.com

Enclosures