

KWAME AJAMU, et al.

Plaintiff

v.

STATE OF OHIO

Defendant

Case No. 2015-00149-WI

2015 MAR 27 PM 3:19

Judge Patrick M. McGrath

ANSWER

For its answer to the allegations of the Complaint, filed February 27, 2015, Defendant the State of Ohio states as follows:

1. Paragraph 1 is denied for lack of knowledge.

2. Paragraph 2 states legal conclusions rather than factual allegations and thus requires no response. However, if this Court determines that a response is required, paragraph 2 is admitted insofar as it alleges that Plaintiffs have been declared wrongfully imprisoned individuals pursuant to R.C. 2743.48, but denied for lack of knowledge as to the amount of damages each of them is entitled to receive. Further answering, paragraph 2 is admitted insofar as it alleges that that Plaintiffs have attached to the Complaint copies of what appears to be entries from the Cuyahoga County Court of Common Pleas. Further answering paragraph 2, the judgment entries in question speak for themselves and Defendant denies any inconsistent allegations. Any remaining allegations of paragraph 2 are denied for lack of knowledge.

3-6. Paragraphs 3, 4, 5, and 6 are denied for lack of knowledge.

7. Paragraph 7 is admitted.

8. Paragraph 8 is admitted insofar as it alleges that Plaintiff Wiley Bridgeman was released on parole or to the custody of the county sheriff from November 6, 2001 to June 17, 2003.

Any remaining allegations of paragraph 8 are denied for lack of knowledge.

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9-12. Paragraphs 9, 10, 11 and 12 are denied for lack of knowledge.

13. Paragraph 13 is admitted insofar as it alleges that that Plaintiffs have attached to the Complaint copies of what appears to be filings in the Cuyahoga County Court of Common Pleas. Further answering paragraph 13, the documents in question speak for themselves and Defendant denies any inconsistent allegations. Any remaining allegations of paragraph 13 are denied for lack of knowledge.

14-16. Paragraphs 14, 15, and 16 are denied for lack of knowledge.

17. Paragraph 17 states legal conclusions rather than factual allegations and thus requires no response. However, if this Court determines that a response is required, paragraph 17 is admitted insofar as it alleges that that Plaintiffs have attached to the Complaint copies of what appears to be entries from the Cuyahoga County Court of Common Pleas. Further answering paragraph 17, the judgment entries in question speak for themselves and Defendant denies any inconsistent allegations. Any remaining allegations of paragraph 17 are denied for lack of knowledge.

18. Paragraph 18 states legal conclusions rather than factual allegations and thus requires no response. However, if this Court determines that a response is required, paragraph 18 is denied for lack of knowledge.

19-21. Paragraphs 19, 20 and 21 are admitted insofar as they allege that Plaintiffs have been declared wrongfully imprisoned individuals pursuant to R.C. 2743.48, but denied for lack of knowledge as to the amount of damages each of them is entitled to receive. Any remaining allegations of paragraphs 19, 20 and 21 are denied for lack of knowledge.

22. Every allegation contained in the Complaint that is not specifically admitted, denied or denied for lack of knowledge is denied.

Respectfully submitted,

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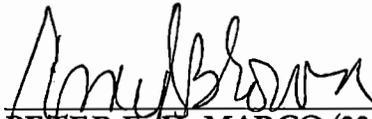
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

On March 27, 2015, we sent an electronic copy of this document via email to Plaintiff's Counsel: Terry H. Gilbert (tgilbert@f-glaw.com) and Jacqueline Greene (jgreene@f-glaw.com).



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