

**LUCAS COUNTY COMMON PLEAS COURT
CASE DESIGNATION**

TO: **Bernie Quilter, Clerk of Courts**

CASE NO. _____

G-4801-CI-0201801075-000

Judge

GARY G. COOK

JUDGE _____

The following type of case is being filed:

Professional Malpractice

- ☐ Legal Malpractice (L)
☐ Medical Malpractice (M)

- ☐ **Product Liability (B)**
☐ **Other Tort (C)**

Workers' Compensation

- ☐ State Funded (D)
☐ Self Insured (K)

- ☐ **Administrative Appeal (F)**

- ☐ **Commercial Docket**

By submitting the complaint, with the signature of the Attorney, the Attorney affirms that the name of person with settlement authority and his/her direct phone number will be provided upon request to a party or counsel in this matter

Other Civil

- ☐ Consumer Fraud (N) ☐ Forfeiture
☐ Appropriation (P) ☐ Court Ordered
☒ Other Civil (H) ☐ Certificate of Title
☐ Copyright Infringement (W)

This case was previously dismissed pursuant to CIVIL RULE 41 and is to be assigned to Judge _____, the original Judge at the time of dismissal. The previously filed case number was CI _____.

This case is a Declaratory Judgment case with a personal injury or related case currently pending. The pending case number is _____, assigned to Judge _____.

This case is to be reviewed for consolidation in accordance with Local Rule 5.02 as a companion or related case. This designation sheet will be sent by the Clerk of Courts to the newly assigned Judge for review with the Judge who has the companion or related case with the lowest case number. The Judge who would receive the consolidated case may accept or deny consolidation of the case. Both Judges will sign this designation sheet to indicate the action taken. If the Judge with the lowest case number agrees to accept, the reassignment of the case by the Administration Judge shall be processed. If there is a disagreement between the Judges regarding consolidation, the matter may be referred to the Administrative Judge.

Related/companion case number _____ Assigned Judge _____

 Approve/Deny Date Approve/Deny Date

Attorney

Robert J. Bahret

Address

Bahret & Associates Co., LPA

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RJB:dg

FILED
LUCAS COUNTY

2018 JAN -8 PM 3:38

COMMON PLEAS COURT
BERNIE QUILTER
CLERK OF COURTS

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IN THE COMMON PLEAS COURT, LUCAS COUNTY, OHIO

G-4801-CI-0201801075-000

Rob Conover
c/o Bahret & Associates Co., L.P.A.
7131 Spring Meadows West Dr., Ste. A
Holland, OH 43528,

**Judge
GARY G. COOK**

and

COMPLAINT WITH JURY DEMAND
ENDORSED HEREON

Stanley Hill
c/o Bahret & Associates Co., L.P.A.
7131 Spring Meadows West Dr., Ste. A
Holland, OH 43528,

Robert J. Bahret (0014985)
BAHRET & ASSOCIATES CO., L.P.A.
7131 Spring Meadows West Dr., Suite A
Holland, Ohio 43528
Telephone: (419) 861-7800
Facsimile: (419) 861-7808
E-mail: rbahret@bahret-law.com
Attorney for Plaintiffs

and

Stephen Coleman
c/o Bahret & Associates Co., L.P.A.
7131 Spring Meadows West Dr., Ste. A
Holland, OH 43528,

and

Dontaviyon Fleming
c/o Bahret & Associates Co., L.P.A.
7131 Spring Meadows West Dr., Ste. A
Holland, OH 43528,

Plaintiffs,

v.

Lincoln Kynard
202 Mead Lane
Holland, OH 43528,

and

Robert Woodley
6863 Greentree Lane
Maumee, OH 43537,

and

Abraham Abouhamed
3555 Sherbrooke Rd.
Toledo, OH 43613,

and

Dana Zeller
2004 Rose Arbor
Toledo, OH 43604

Defendants.

Now come Plaintiffs, by and through counsel, Robert J. Bahret and Bahret & Associates Co., L.P.A., and for their Complaint against the Defendants allege as follows:

1. That all Plaintiffs herein are members of the coaching staff for the varsity boys basketball program at Maumee Valley Country Day School.
2. That Defendants have one or more children enrolled at the school and may additionally have their children playing on the varsity basketball team coached by Plaintiffs herein.
3. All activities complained of herein have taken place in Lucas County, Ohio.
4. That, what apparently originated as a dispute over playing time allowed for their children, the Defendants began a series of verbal and written attacks upon the Plaintiffs herein.
5. The Defendants have made false claims against each of the Plaintiffs herein, alleging use of drugs, multiple criminal convictions, attacks upon honor and integrity, and also claims that Plaintiffs falsified their records and qualifications in order to be allowed to coach high school basketball by the Ohio State High School Athletic Association.

6. The Defendants have verbally made these accusations in various public forums, but they have also caused to be published various emails, including an allegedly anonymous email, sent to virtually every parent of children at the school, all to Plaintiffs' embarrassment.

7. Although the school commissioned an independent investigation into the allegations, and after the investigator issued a written report determining that absolutely none of the allegations bore any merit whatsoever, the Defendants continued to publish such falsehoods, damaging the reputations and careers of Plaintiffs herein.

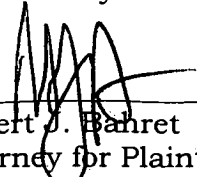
8. Not only are many of the allegations libelous/slandorous per se, but Plaintiffs have sustained damages in a variety of forms, including being more rigorously scrutinized by other agencies that have involvement with running camps or providing basketball instruction to young men.

9. Because of the Defendants' activities, not only have the Plaintiffs been embarrassed and suffered humiliation, but they have also suffered financially.

10. Despite the independent investigation totally exonerating each of the Plaintiffs herein the Defendants continue and persist in their harmful activities with the spirit of ill-will and maliciousness towards Plaintiffs.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally, in an amount in excess of \$25,000 as and for compensatory damages. Plaintiffs further demand a judgment against the Defendants, jointly and severally, in an amount in excess of \$25,000 as and for punitive damages, along with an award of attorney fees and costs incurred herein.

Respectfully submitted,



Robert J. Bahret
Attorney for Plaintiffs