

IN THE SUPREME COURT OF OHIO

Case No. 2014-1122

STATE OF OHIO ex rel. Stephanie Y. Clough

Relator

v.

FRANKLIN COUNTY CHILDREN'S SERVICES, OHIO et al.,

Respondents

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RENEWED EMERGENCY MOTION TO EXPEDITE DECISION FOR ORIGINAL ACTION  
IN MANDAMUS

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RELATOR, PRO SE

Franklin County Children's Services, Ohio  
Charles M. Spinning, Executive Director  
855 W. Mound Street  
Columbus, Ohio 43223  
Phone: 614-275-2571

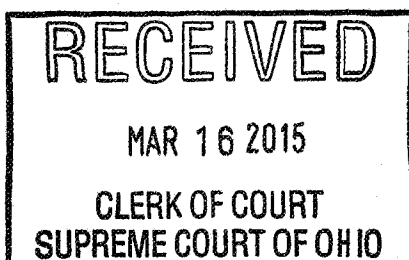
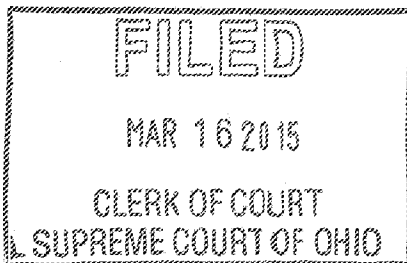
and

Franklin County Children's Services, Ohio  
Anne O'Leary, Chief Legal Counsel  
855 W. Mound Street  
Columbus, Ohio 43223  
Phone: 614-275-2571

RESPONDENTS

Franklin County Prosecuting Attorney  
Ronald J. O'Brien 17245  
373 S. High Street  
14<sup>th</sup> Floor  
Columbus, OH 43215  
Phone: 614-525-3555

COUNSEL OF RECORD



Now comes the State of Ohio, on relation to one of its citizens, Stephanie Y. Clough (hereinafter, "Relator"), who hereby Renews her Motion to Expedite its Decision for Relator's Original Action in Mandamus. Relator incorporates her Emergency Motion to Expedite its Decision for Relator's Action in Mandamus filed February 26, 2015 in its entirety as if contained in this motion.

There are no pending matters requiring evidential briefing or hearing to resolve and just cause exists to swiftly resolve this case. Relator has clearly established under state statutes and Franklin County Children Services (FCCS) Board of Director's "Grievance and Consumer Rights" that she has the legal right to inspect and copy FCCS case records pertaining to her and her minor child. It has been nearly twelve weeks since Relator filed her reply brief and two weeks since Relator filed an Emergency Motion to Expedite its Decision on this matter. It is an injustice for the Relator to have to endure any further delay in gaining access to records she has sought and has been unlawfully and improperly denied for over five years.

The history of this case is as follows:

On July 3, 2014 – Relator filed an Original Action in Mandamus with this Court in order to inspect and/or copy investigative records pertaining to her Franklin County Children Services case file # 1866149, naming Respondents Spinning and O'Leary, Executives of FCCS.

On July 7, 2014 – This Court issued a summons and complaint to Respondents Spinning and O'Leary.

On July 22, 2014 – This Court referred the case to mediation.

On August 28, 2014 – The case was returned to the regular docket and response to complaint was due within 28 days.

Respondents reply to the complaint was due on or about September 18, 2014.

Respondents failed to reply.

On November 5, 2014 – This Court issued an Alternative Writ.

On November 20, 2014 – Relator filed her Submission of Evidence.

On November 21, 2014 – Relator filed her Merit Brief.

On November 24, 2014 – Respondents filed their Submission of Evidence.

On December 11, 2014 – Respondents filed their Merit Brief.

On December 17, 2014 – Relator filed her Reply Brief.

On February 26, 2014 – Relator filed an Emergency Motion to Expedite its Decision for Relator's Original Action in Mandamus.

WHEREFORE, Relator requests that this Honorable Court execute its authority granted under the US and Ohio Constitutions to issue extraordinary writs and immediately issue a Writ of Mandamus compelling Respondents to afford the Relator her right to inspect and copy her and her minor child's case file and notes authorized by state statutes and FCCS Board of Director's "Grievance and Consumer Rights" together with any award for statutory damages and costs associated with filing this original action in mandamus, as well as all other relief to which Relator may be entitled in law or in equity.

Respectfully submitted



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**CERTIFICATE OF SERVICE**

I hereby certify that I served the above *Renewed Emergency Motion to Expedite Decision* for Original Action in Mandamus filed by Relator Stephanie Y. Clough to the following by regular U.S. Mail this 13<sup>th</sup> day of March, 2015.

Franklin County Children's Services, Ohio  
Charles M. Spinning, Executive Director  
855 W. Mound Street  
Columbus, Ohio 43223  
Phone: 614-275-2571

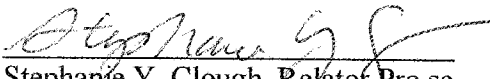
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