

IN THE COURT OF COMMON PLEAS
WILLIAMS COUNTY, OHIO

FIRE CHIEF DOUGLAS POOL,

Plaintiff,

v.

DAD'S PLACE OF BRYAN, OHIO

and

RIEHLE RENTALS, LLC,

Defendant.

) Case No. 24CI000100

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) Judge J.T. Stelzer

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)

) DEFENDANT DAD'S PLACE'S

) MOTION TO STAY THE COURT'S

) PRELIMINARY INJUNCTION

) PENDING APPEAL

MOTION TO STAY THE COURT'S PRELIMINARY INJUNCTION PENDING A NOTICE OF APPEAL

The Court granted Plaintiffs' Request for a Preliminary Injunction against Defendant Dad's Place of Bryan, Ohio ("Dad's Place" or "the Church") on Thursday, December 5, 2024. The Court enjoined Dad's Place from "using the first floor" of its Church "as a residential use occupancy" and "from allowing any individual to use the first floor" to sleep. Dad's Place plans to appeal the grant of the preliminary injunction to the Sixth District Court of Appeals, since the enjoined conduct is protected under Ohio Constitution's Conscience Clause and the U.S. Constitution's Free Exercise Clause.

Pursuant to Ohio Civ.R. 62(A) and 62(B), Dad's Place asks the Court for (1) an immediate temporary or administrative stay or (2) a ten-day stay to seek emergency relief in the court of appeals.

Granting a stay is particularly important given weather conditions right now. If Plaintiffs are allowed to enforce the injunction, the congregants currently staying at Dad's Place will be forced out into sub-zero temperatures *tonight*—with inadequate time to find alternative shelter from the cold.

The Church will consider this court to have denied this request if the Church does not hear by 3:00 PM on Friday, December 6.

Respectfully submitted,

Philip D. Williamson (0097174)
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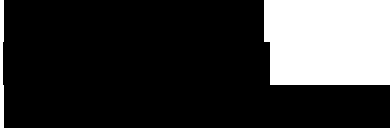


Attorney for Defendant Dad's Place

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2024, a copy of the foregoing was served on the following via email:

Marc A. Fishel
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Counsel for Plaintiff Chief Douglas Pool

Philip D. Williamson