



NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

NOTICE OF APPEARANCE
February 1, 2023 15:03

By: SARA COULTER 0096793

Confirmation Nbr. 2765476

KATHERINE MCLAUGHLIN, ET AL.

CV 22 973016

vs.

JOHN DOE

Judge: ANDREW J. SANTOLI

Pages Filed: 3

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

KATHERINE MCLAUGHLIN and
CITY OF BEACHWOOD,

Plaintiffs,

vs.

JOHN DOE,

Defendant.

CASE NO. CV-22-973016

JUDGE ANDREW J. SANTOLI

**NOTICE OF LIMITED APPEARANCE
AND REQUEST FOR EXTENSION OF
ALL DEADLINES**

The undersigned, Andrew Geronimo and Sara Coulter, attorneys with The First Amendment Clinic at Case Western Reserve University School of Law, hereby enter their limited appearance under Civ. R. 3(B) for the purpose of protecting the First Amendment right of anonymous speech and contesting this court's jurisdiction over the John Doe Defendant posting as Amin Yashed. Further, the undersigned, Abigale Groseclose, Kennedy Dickson, Vincent Palumbo, and Zach Tomi, Certified Legal Interns under Gov. Bar. R II, hereby enter their limited appearances, as supervised by Andrew Geronimo, Ohio Bar No. 0086630 and Sara Coulter, Ohio Bar No. 0096793, for Defendant Doe in this matter. Please direct all case materials to the undersigned.

The Defendant using the pseudonym Amin Yashed has not been served with the summons and complaint in this action, and the undersigned enter their limited appearance with authorization in order to preserve this Defendant's ability to assert additional defenses, including but not limited to jurisdictional defenses such as failure of service.

The Amin Yashed Doe Defendant intends to oppose the Motion to Authorize Discovery to Obtain Identifying Information of Defendant. Because counsel was only recently retained, the undersigned respectfully requests a brief extension of any deadlines and a stay of any discovery applicable to Defendant Doe to allow the undersigned to consult with the client on the appropriate steps going forward in this matter.

Respectfully,

/s/ Kennedy Dickson
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Attorneys for the John Doe Defendant
Identified in the Complaint as "Amin
Yashed"**

Certificate of Service

The undersigned certifies that on February 1, 2023 I submitted this *Notice of Limited Appearance of Counsel* to the Court via the Court's electronic filing system, and served it on all counsel of record via email.

/s/ Sara Coulter
Sara Coulter (#0096793)