

O'Grady

IN THE FRANKLIN COUNTY MUNICIPAL COURT
CIVIL DIVISION

FILED
2015 MAR 12 AM 8:50
FRANKLIN COUNTY
MUNICIPAL COURT
LORI M. TYACK

VERONICA WAGNER COVATCH,
et al.,

Plaintiffs,

Case No. 2014-CVF-024571

v.

JUDGE JAMES O'GRADY

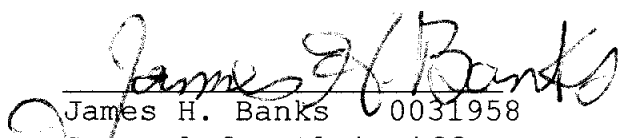
CENTRAL OHIO SHELTYE RESCUE,
INC., et al.,

MOTION TO PERMIT EXAMINATION
BY PLAINTIFFS' VETERINARIAN

Defendants.

Now come plaintiffs, by and through counsel, and move this Court for an order requiring the defendant(s) to produce "Piper", the subject of this action, for examination by a veterinarian of plaintiffs' choice for good cause, as set forth in the accompanying Memorandum In Support attached hereto and incorporated herein as if fully rewritten.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

This is an action for replevin and conversion, among other claims, related to the detention of plaintiffs' show dog, Piper, by defendants.

Defendants have had sole possession/control of Piper since mid-April, 2014. Issues have arisen as to whether the

identifying chip has been removed from Piper, whether unauthorized breeding of Piper has occurred, and similar matters. As such, the issue of the health and wellbeing of Piper is of growing concern, such that it is imperative that plaintiffs be permitted to have Piper seen and examined by a veterinarian of their choice.

Just resolution of this cause likely will include return of Piper to plaintiffs. Accordingly, it is imperative that it is confirmed that Piper is safe and well.

In the interest of justice, therefore, this Court should issue an order requiring defendant(s) to deliver Piper to a veterinarian of plaintiffs' choice within a reasonable time.

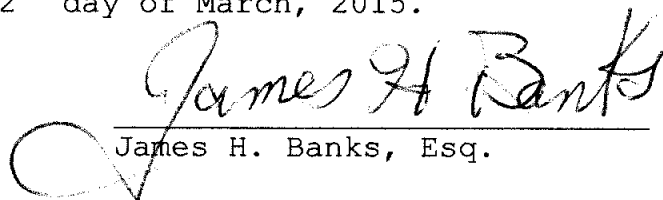
Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was duly served upon John A. Bell, Esq., P.O. Box 091022, Bexley, Ohio 43209, personally and/or via ordinary U.S. Mail, postage prepaid, this 12th day of March, 2015.



James H. Banks, Esq.