

**IN THE HURON MUNICIPAL COURT  
ERIE COUNTY, OHIO**

STATE OF OHIO (Huron)	)	
	)	Case No. 19 CRB 0126
Plaintiff,	)	
	)	
v.	)	JUDGE DWIGHT OSTERUD
	)	
STACY HINNERS,	)	
	)	<b><u>MOTION TO DISMISS</u></b>
Defendant	)	<b><u>AT CITY'S COSTS</u></b>
	)	

Now comes the City of Huron (the "City"), by and through the undersigned, and hereby respectfully moves this Court to dismiss this pending action, at the City's costs and without prejudice. The City makes this motion even though the undersigned believes there is probable cause for the pending charges.

Due solely to the actions and efforts of counsel for the Defendant Stacy Hinners (the "Defendant"), the Attorney General and/or the Ohio Bureau of Criminal Identification are conducting an investigation of the circumstances of the Defendant's prosecution. Further, the Defendant and her counsel have filed a document that indicates that various witnesses should be "Mirandized" because of that investigation (which was solely instituted by the Defendant and not any criminal investigation agency). Thus, it is in the best interests of all involved that this matter be dismissed (at the City's costs and without prejudice to further prosecution)

while that Defendant-initiated Attorney General investigation is pending.

Accordingly, the City so moves this Court.

Respectfully submitted;

LIPSON O'SHEA LEGAL GROUP

**/s/ Michael J. O'Shea**

Michael J. O'Shea, Esq. (0039330)

[michael@lipsonoshea.com](mailto:michael@lipsonoshea.com)

The Hoyt Block Building - Suite 110

700 West St. Clair Avenue

Cleveland, Ohio 44113

(216) 241-0011

(440) 331-5401 - fax

**Attorney and Special Prosecutor  
for City of Huron**

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon the following attorneys and parties:

Subodh Chandra, Esq.

[Subodh.Chandra@ChandraLaw.com](mailto:Subodh.Chandra@ChandraLaw.com)

Brian D. Bardwell, Esq.

[Brian.Bardwell@ChandraLaw.com](mailto:Brian.Bardwell@ChandraLaw.com)

The Chandra Law Firm LLC

The Chandra Law Building

1265 W. 6th Street, Suite 400

Cleveland, OH 44113

216.578.1800 fax

by regular U.S. Mail and/or email transmission this 7th day of October, 2019.

**/s/ Michael J. O'Shea**

Michael J. O'Shea