

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

STATE OF OHIO,	*	CASE NO. CR - 2020 10 2863
Plaintiff	*	
	*	
- VS. -	*	JUDGE ALISON McCARTY
	*	
JOSEPH SENK,	*	<u>MARSDEN MOTION</u>
Defendant	*	
	*	
	*	

MOTION TO HAVE NEW COUNSEL APPOINTED

Now comes Joseph Senk, Defendant in the above-captioned case, and respectfully moves The Court to appoint new counsel to represent Defendant on the grounds that Defendant's present counsel,

John W. Greven has incompetently, inadequately and, in a wholly-biased manner, refused to represent Defendant or to recuse himself; harmful actions including issuing pleas in opposition to stated desires of Defendant.

In support of said motion, Defendant would show unto the court the following:

On February 16, 2023, outside courtroom of Alison McCarty, Public Defender Greven
did explicitly refuse to at any point submit the plea of Not Guilty on behalf of the Defendant
to the Court in the presence of Defendant and his witness, Cristina Delia. Said refusal precludes
Defendant from proceeding to request fair and impartial outcome through a Trial by Jury in this
matter.

Upon entering the courtroom, Greven did exacerbate this misfeasance by slandering his
client, recommending to the court a psychiatric evaluation. Since February 16, 2023, Greven has
not yielded in his refusal to lawfully represent Defendant in an unbiased manner.

WHEREFORE, Defendant moves the Court to appoint new counsel to represent Defendant.

WITNESS my signature this 24 day of April 2023.



Joseph Edward Senk
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CERTIFICATE OF SERVICE

This is to certify that I, Joseph Edward Senk "Defendant" in the above captioned case have this date served a true and correct copy of the above and foregoing motion by U.S. Mail, postage prepaid, to the following council of record for the Defendant.

John W. Greven

137 South Main Street, Suite 201

Akron, Ohio 44308

330-253-7171

Posted this 25th day of April, 2023.

Respectfully submitted,
as "JOSEPH SENK, DEFENDANT"

Joseph Edward Senk

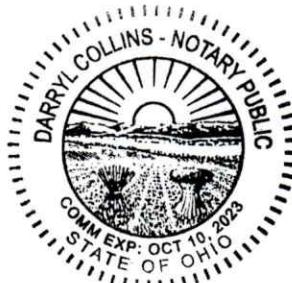
Joseph Edward Senk
(all rights reserved)

Joseph Edward Senk

78 Beech Avenue

Northfield, Ohio 44067

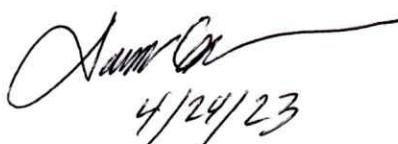
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cc : Akron Bar Association

57 South Broadway Street

Akron, Ohio 44308-1702


4/24/23