IN THE SIXTH DISTRICT COURT OF APPEALS LUCAS COUNTY, OHIO

7005 APPEALS

2005 NOV 28 P 2: 40

CITY OF TOLEDO,

EDO,

: App. No. 4801 -CL -2005@

BERNIE QUILTED

Plaintiff-Appellee,

App. No. 4801 -CL -2003 LETAN OF COURTS

v.

Toledo Municipal Court No. CRB -05-06830

BRUCE BEATTY,

:

Defendant-Appellant.

MOTION FOR LEAVE TO FILE OHIO ATTORNEY GENERAL JIM PETRO'S BRIEF OF AMICUS CURIAE IN SUPPORT OF HOUSE BILL 12

Attorney General Jim Petro respectfully moves the Court as *amicus curiae* for leave to be heard on the constitutionality of House Bill 12, the Concealed Carry Law. Because the Attorney General is the chief law officer for the state and all its departments, and appears for the state in matters in which the state is directly or indirectly interested – such as challenges to Ohio's statutes - it is appropriate for this Court to hear the Attorney General regarding the constitutionality of Ohio's Concealed Carry Law. The *Brief of Amicus Curiae in Support of House Bill 12* is attached to be conditionally filed with this Motion for Leave.

Respectfully submitted,

JIM PETRO (0022096)

Attorney General

HOLL&J(HUNT (0075069)

Assistant Attorney General

Constitutional Offices Section

30 East Broad Street, 17th Floor

Columbus, OH 43215-3428

(614) 466-2872 / (614) 728-7592 FAX

Counsel for Amicus Curiae

Ohio Attorney General Jim Petro

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Motion for Leave to File Attorney*General Jim Petro's Brief of Amicus Curiae in Support of the Constitutionality of H.B. 12 was sent via regular U.S. mail this 28th day of November, 2005 to the following:

William Stephenson, Esq. 9309 Rudolph Road Rudolph, Ohio 43462 *Attorney for Appellant*

John Madigan, Esq. Daniel Pilrose, Esq. City of Toledo 555 N. Erie Street Toledo, Ohio 43624 Attorney for Appellee

HOLLY J. HUNT

Assistant Attorney General