

FILED
ADAMS COUNTY
CLERK OF COURT
2026 JAN 20 PM 1:31

IN THE COURT OF COMMON PLEAS,
ADAMS COUNTY, OHIO
GENERAL DIVISION

Larry Heller
CLERK

SHAWN D. COOLEY, et al.,	:	Case No. 2023-0069
Plaintiffs,	:	
v.	:	Judge Jonathan P. Hein
JOSEPH EDGAR FOREMAN,	:	
A/K/A AFROMAN, et al.	:	
Defendants.	:	

PLAINTIFFS' NOTICE OF SUBSTITUTION OF COUNSEL

Notice is hereby given that Daniel T. Downey enters his appearance and substitution of counsel in place of David C. Moser as trial counsel for Plaintiffs, Shawn D. Cooley, Justin Cooley, Michael D. Estep, Shawn S. Grooms, Brian Newland, Lisa Phillips, and Randolph L. Walters, Jr. Sara L. McElroy remains as co-counsel for Plaintiffs, Shawn D. Cooley, Justin Cooley, Michael D. Estep, Shawn S. Grooms, Brian Newland, Lisa Phillips, and Randolph L. Walters, Jr.

By this notice, the Clerk of Courts is requested to change the docket sheets to reflect this substitution of trial counsel, and all counsel and parties are requested to serve all future pleadings notices and orders to Daniel T. Downey and Sara L. McElroy.

Respectfully submitted,

/s/ Daniel T. Downey

Daniel T. Downey (0063753)

Sara L. McElroy (0099672)

FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLC

7775 Walton Parkway Suite 200

New Albany, OH 43054

(614) 221-1216 – Telephone

(614) 221-8769 – Facsimile

ddowney@fisheldowney.com

smcelroy@fisheldowney.com

Counsel for Plaintiffs as to Counterclaims

CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served by email, this 20th day of January 2026, upon the following:

Robert A. Klingler, Esq.
Robert A. Klingler Co. L.P.A.
895 Central Avenue, Suite 300
Cincinnati, OH 45202
rak@klinglerlaw.com
Attorney for Plaintiffs

David S. Osborne, Jr., Esq.
Law Offices of Dr. David Osborne, Jr., LLC
115 West Main Street
West Union, Ohio 45693
attorneydavidosbornejr@gmail.com
*Attorney for Defendants Joseph Foreman
and Hungry Hustler Records*

/s/ Daniel T. Downey
Daniel T. Downey (0063753)
FISHEL DOWNEY ALBRECHT RIEPENHOFF LLC
Counsel for Plaintiffs as to Counterclaims