

**IN THE COMMON PLEAS COURT OF MONTGOMERY COUNTY, OHIO  
CRIMINAL DIVISION**

**STATE OF OHIO**

**CASE NO. 2024 CR 3226**

**Plaintiff**

**JUDGE STEVEN K. DANKOF**

**v.**

**JONATHAN ERIC LINK  
Defendant**

**STATE'S MOTION FOR LEAVE to FILE  
AFTER the 5:00 PM DEADLINE**

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The State respectfully requests leave to file the State's motion regarding the Court's Proposed Jury Instruction past the 5:00 PM Deadline on November 6, 2025. In an effort to organize witnesses for trial and get pretrial matters before the Court in a timely fashion, the State has submitted a flurry of filings this week.

The State should have, but did not, realize there was a 5:00 PM deadline on this instant response, or the State would have filed this response before those other filings. The State seeks leave to file beyond the 5:00 PM deadline. The State requests the Court consider the State's response to the Court's proposed jury instructions.

Respectfully submitted,

MATHIAS H. HECK, JR.  
Prosecuting Attorney

By: /s/ Lynda A. Dodd  
Lynda A. Dodd #0068551  
Assistant Prosecuting Attorney  
301 W. Third St., Suite 500  
P.O. Box 972  
Dayton, OH 45422  
(937) 225-5757

ATTORNEY FOR PLAINTIFF  
STATE OF OHIO

CERTIFICATE OF SERVICE

I hereby certify that on date of this filing, this document was electronically filed via the Court's authorized electronic filing system which will send notifications of this filing to DENNIS LIEBERMAN, Attorney for Defendant.

/s/ Lynda A. Dodd

Lynda A. Dodd #0068551  
Assistant Prosecuting Attorney