



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**MOTION Electronically Filed:**  
**May 18, 2016 14:44**

By: DAVID M. DVORIN 0067673

Confirmation Nbr. 755298

LOAY G. SAYAH

vs.

GEORGE D. ALBERT

CV 15 852284

**Judge:**

DICK AMBROSE

**Pages Filed: 4**

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

LOAY G. SAYAH	)	CASE NO. CV-15-852284
	)	
Plaintiff,	)	JUDGE: DICK AMBROSE
v.	)	
	)	<b><u>MOTION FOR DEFAULT</u></b>
GEORGE D. ALBERT	)	<b><u>JUDGMENT AGAINST GEORGE D.</u></b>
	)	<b><u>ALBERT</u></b>
	)	
Defendant.	)	

Pursuant to Civ. R. 55(A) of the Ohio Rules of Civil Procedure, Plaintiff Loay G. Sayah (“Plaintiff”), moves this Court for default judgment in his favor for the relief prayed for in his Complaint the above-referenced action against Defendant George D. Albert (“Defendant”). Plaintiff obtained service on the Defendant. Defendant has at all times failed to move, plead or otherwise provide a response to the Complaint in accordance with Rules 12(A) and 55(A) of the Ohio Rules of Civil Procedure. Accordingly, pursuant to Civ. R. 55, Plaintiff is entitled to default judgment against Defendant.

Respectfully submitted,

/s/ David M. Dvorin

DAVID M. DVORIN (0067673)  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was sent on this May 18th, 2016 via regular U.S. Mail,  
postage prepaid, on the following:

GEORGE D. ALBERT  
1763 EDGEFIELD ROAD  
LYNDHURST, OH 44124

And

406 East Fayette Street  
Connellsville, PA 15424

*/s/ David M. Dvorin*

David M. Dvorin

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

LOAY G. SAYAH	)	CASE NO. CV-15-852284
	)	
Plaintiff,	)	JUDGE: ROBERT C. McCLELLAND
v.	)	
	)	<b><u>AFFIDAVIT OF DAVID M. DVORIN,</u></b>
GEORGE D. ALBERT	)	<b><u>ESQ.</u></b>
	)	
Defendant.	)	

David M. Dvorin, Esq., being first duly sworn, deposes and says:

1. I am an attorney at law duly licensed to practice in the State of Ohio and represent the party seeking foreclosure in the above-captioned foreclosure. As such, I am fully aware of the underlying action, as well as the proceedings had herein.
  
2. On the date of May 18, 2016, I communicated with Plaintiff Loay G. Sayah, who informed me that she personally (a) reviewed her records pertaining to the loan at issue in this matter; and (b) reviewed the pleadings in this matter and confirms the factual accuracy of said items as they relate to said loan.
  
3. Based upon my communications with Plaintiff Loay G. Sayah, as well as my own inspection of the papers filed with the Court and other diligent inquiry, I certify that, to the best of my knowledge, information and belief, the pleadings are accurate in all relevant respects. I understand my continuing obligation to amend this Affidavit in light of newly discovered facts following its filing.

4. I understand that the Court will rely on this Affidavit in considering the application.

**AFFIANT FURTHER SAYETH NAUGHT**



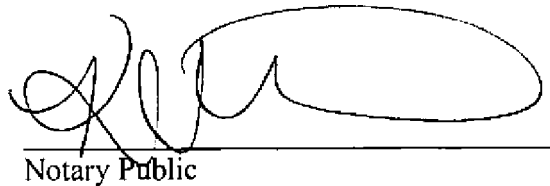
A handwritten signature in black ink, appearing to be 'D. E.', written over a horizontal line.

Subscribed and sworn to before me, a Notary Public in and for said County and State, this

18 day of May, 2016.



KATHARINE D. WELTON  
Notary Public - State of Ohio  
My Commission Expires 2/10/19



A handwritten signature in black ink, appearing to be 'K. Welton', written over a horizontal line. Below the line, the words 'Notary Public' are printed.