

OHIO COURT OF APPEALS, NINTH JUDICIAL DISTRICT

State ex rel. Huffman v. Rickett

2026-Ohio-1703 (Ohio Ct. App. 9th Dist. 2026) · No. 26AP0003 · Decided May 11, 2026

SUMMARY

The Ninth District Court of Appeals dismissed Cody Huffman’s original action seeking a writ of mandamus to compel Judge Michael W. Rickett to release vehicle registration blocks imposed for unpaid court debts. The court held that one claim was moot because the registration block had already been released, and that claims involving seven cases were fatally defective because Judge Rickett had not presided over them. The court dismissed the remaining claims under Civ.R. 12(B)(6), concluding that House Bill 29 did not require removal of registration blocks associated with the criminal misdemeanors at issue.

CASE DETAILS

COURT	Ohio Court of Appeals, Ninth Judicial District
WRITING FOR THE COURT	Per Curiam; Jill Flagg Lanzinger; Sutton, J.; Stevenson, J.
JURISDICTION	Ohio Court of Appeals, Ninth Judicial District
DECIDED	May 11, 2026
DOCKET	26AP0003
DISPOSITION	dismissed
PROCEDURAL POSTURE	Original action in mandamus. Relator sought an order requiring the respondent judge to release vehicle-registration blocks allegedly imposed for nonpayment of court debts and to certify their release. The respondent moved to dismiss under Civ.R. 12(B)(6); relator moved for summary judgment.
STANDARD OF REVIEW	On a Civ.R. 12(B)(6) motion, the court presumes the truth of all factual allegations in the complaint and makes all reasonable inferences in favor of the nonmoving party. Dismissal is proper when, under that standard, it appears beyond doubt that the relator can prove no set of facts entitling the relator to relief.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	State of Ohio ex rel. Cody Huffman v. Judge Michael W. Rickett

TOPICS

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QUESTIONS PRESENTED

1. Whether the claim concerning a vehicle-registration block already released was moot.
2. Whether the mandamus claims concerning cases over which the respondent judge did not preside were fatally defective because the named respondent could not grant the requested relief.
3. Whether Huffman demonstrated a clear legal right to removal of registration blocks imposed after criminal-misdemeanor convictions under House Bill 29, R.C. 4510.22, or related statutory provisions.
4. Whether Huffman's motion for summary judgment remained justiciable after dismissal of the mandamus action.

HOLDINGS

1. A mandamus claim seeking release of a vehicle-registration block is moot when the block has already been released and the court can no longer grant effective relief.
2. A mandamus petition is fatally defective when it fails to name a respondent who can grant the requested relief.
3. Huffman failed to state a mandamus claim because he could not establish a clear legal right to removal of the registration blocks imposed in the three remaining cases.
4. The relator's motion for summary judgment was moot after the mandamus action was dismissed.

KEY QUOTATIONS

“A complaint can only be dismissed when, having viewed the complaint in this way, it appears beyond doubt that the relator can prove no set of facts that would entitle him to the relief requested.” (¶ 2)

“When a mandamus petitioner fails to name any party who can grant the relief he seeks in his petition, the petition is ‘fatally defective’ and subject to dismissal.” (¶ 7)

“For a writ of mandamus to issue, a relator must demonstrate that (1) the relator has a clear legal right to the relief prayed for, (2) respondent is under a corresponding clear legal duty to perform the requested acts, and (3) relator has no plain and adequate legal remedy.” (¶ 9)

FACTUAL BACKGROUND

Huffman alleged that vehicle-registration blocks had been imposed in eleven Wayne County Municipal Court cases because of unpaid fines, fees, or other court debts. He claimed that Am.Sub.H.B. 29 and R.C. 4510.22 required retroactive removal of all such blocks. The court determined that one block had already been released, Judge Rickett had not presided over seven of the cases, and Huffman's convictions in the three remaining cases

were criminal misdemeanors rather than motor-vehicle offenses or minor misdemeanors covered by the relevant provisions of House Bill 29.

PROCEDURAL HISTORY

Huffman filed a mandamus complaint and then an amended complaint identifying eleven Wayne County Municipal Court cases. Judge Rickett answered and moved to dismiss for failure to state a claim, while Huffman moved for summary judgment. The Ninth District considered related municipal-court dockets and dismissed the action, concluding that one claim was moot, seven claims were fatally defective because Judge Rickett did not preside over the relevant cases, and the remaining three claims failed on the merits.

DISPOSITION

dismissed

CASES CITED

- State ex rel. Seikbert v. Wilkinson, 69 Ohio St.3d 489, 490 (1994)
- Goudlock v. Voorhies, 2008-Ohio-4787, ¶ 7
- State ex rel. Peoples v. Schneider, 2020-Ohio-1071, ¶ 9
- State ex rel. Crabtree v. Franklin Cty. Bd. of Health, 77 Ohio St.3d 247, 249 n.1 (1997)
- State ex rel. Neguse v. McIntosh, 2020-Ohio-3533, ¶ 18
- State ex rel. Grendell v. Geauga Cty. Bd. of Commrs., 2022-Ohio-2833, ¶ 9
- State ex rel. Wood v. Rocky River, 2021-Ohio-3313, ¶ 13
- State ex rel. Eubank v. McDonald, 2013-Ohio-72, ¶ 1
- State ex rel. Sirafi v. Oldfield, 2025-Ohio-2761, ¶ 5 (9th Dist.)
- State ex rel. Lagway v. Williams, 2026-Ohio-1014, ¶¶ 2, 4 (9th Dist.)
- State ex rel. Johnson v. Jensen, 2014-Ohio-3159, ¶ 5
- State ex rel. Adams v. Winkler, 2022-Ohio-271, ¶ 14
- State ex rel. Serv. Emp. Internatl. Union, Dist. 925 v. State Emp. Relations Bd., 81 Ohio St.3d 173, 176
- State ex rel. Smith v. Rothal, 2002 WL 386393, *3 (9th Dist. Mar. 5, 2002)

OPINION

PER CURIAM.

[Cite as State ex rel. Huffman v. Rickett, 2026-Ohio-1703.] STATE OF OHIO) IN THE COURT
OF APPEALS) ss: NINTH JUDICIAL DISTRICT COUNTY OF WAYNE) STATE OF OHIO EX
REL. CODY HUFFMAN Relator C.A. No. 26AP0003 v. JUDGE MICHAEL W. RICKETT
ORIGINAL ACTION IN MANDAMUS Respondent Dated: May 11, 2026 PER CURIAM. {¶1}
Relator, Cody Huffman, has petitioned this Court for a writ of mandamus ordering Respondent,

Judge Rickett, to release vehicle registration blocks imposed upon him and certify that the blocks have been released.

Judge Rickett has filed an answer, which includes a motion to dismiss for failure to state a claim upon which relief can be granted. Additionally, Mr. Huffman has moved for summary judgment. Judge Rickett has responded in opposition to the motion for summary judgment, and Mr. Huffman has filed a reply.

For the following reasons, the case is dismissed. Civ.R. 12(B)(6) Review and the Facts Alleged by Mr. Huffman {¶2} When this Court reviews a motion to dismiss under Civ.R. 12(B)(6), we must presume that all of the factual allegations in the complaint are true and make all reasonable inferences in favor of the nonmoving party. *State ex rel. Seikbert v. Wilkinson*, 69 Ohio St.3d 489, 2 490 (1994).

A complaint can only be dismissed when, having viewed the complaint in this way, it appears beyond doubt that the relator can prove no set of facts that would entitle him to the relief requested. *Goudlock v. Voorhies*, 2008-Ohio-4787, ¶ 7. ““Material incorporated in a complaint may be considered part of the complaint for purposes of determining a Civ.R. 12(B)(6) motion to dismiss.”” *State ex rel.*

Peoples v. Schneider, 2020-Ohio-1071, ¶ 9, quoting *State ex rel. Crabtree v. Franklin Cty. Bd. of Health*, 77 Ohio St.3d 247, 249, fn. 1 (1997). Moreover, “a court may take notice of the docket and record in a closely related case to determine whether the current complaint states a claim for relief.” *State ex rel. Neguse v. McIntosh*, 2020-Ohio-3533, ¶ 18. With the foregoing standard in mind, we turn to the facts alleged in the petition and the materials incorporated therein. {¶3} Mr. Huffman initiated this action by filing a complaint for writ of mandamus.

Several days later, he filed an amended complaint. The amended complaint alleged that he was the defendant in eleven Wayne County Municipal Court cases: “2014 CR-B 001383, 2015 CR-B 000245, 2018 CR-B 000667, 2018 CR-B 000988, 2018 CR-B 001455, 2018 CR-B 001460, 2021 CR-B 000912, 2021 CR-B 001471, 2023 CR-B 000137, TRD-11-12-10838, and CRB-11-11-01633.” According to the amended complaint, in each of the cases, Mr. Huffman was subject to a vehicle registration block for nonpayment of a court debt. {¶4} The amended complaint named Judge Rickett as the sole respondent in his official capacity as a judge of the Wayne County Municipal Court.

It alleged that Judge Rickett had failed to perform “a mandatory, ministerial duty required by Ohio law.” According to the amended complaint, Am.Sub.H.B. 29 (“House Bill 29”) took effect in April 2025. The amended complaint alleged that provisions of the bill apply retroactively and expressly mandated the removal of all debt-based vehicle registration blocks.

Mr. Huffman seeks an order directing Judge Rickett to 3 comply with House Bill 29/R.C. 4510.22, remove the registration blocks placed on him in each of his eleven cases, and certify that the blocks have been released. A Portion of the Amended Complaint is Moot {¶5} When an actual controversy no longer exists before this Court, we must dismiss a case as moot.

State ex rel. Grendell v. Geauga Cty. Bd. of Commrs., 2022-Ohio-2833, ¶ 9. A case is moot when, without any fault of the respondent, an event occurs which renders it impossible for this Court to grant any relief to the relator. State ex rel. Wood v. Rocky River, 2021-Ohio-3313, ¶ 13. See also State ex rel. Eubank v. McDonald, 2013-Ohio-72, ¶ 1 (“Mandamus will not lie to compel an act that has already been performed.”). {¶6} A review of the docket in Wayne County Municipal Court Case No. 2014 CR-B 001383 reveals that a release of Mr. Huffman’s vehicle registration block was filed on February 20, 2026.

See State ex rel. Sirafi v. Oldfield, 2025-Ohio-2761, ¶ 5 (9th Dist.) (court may consider extrinsic evidence to determine mootness); State ex rel. Neguse, 2020-Ohio-3533, at ¶ 18 (“[A] court may take notice of the docket and record in a closely related case to determine whether the current complaint states a claim for relief.”).

To the extent Mr. Huffman seeks the release of that registration block, his amended complaint is moot. Accordingly, his amended complaint is dismissed as to Case No. 2014 CR-B 001383. A Portion of the Amended Complaint is Fatally Defective {¶7} “Mandamus is a writ, issued in the name of the state to an inferior tribunal, a corporation, board, or person, commanding the performance of an act which the law specially enjoins as a duty resulting from an office, trust, or station.” R.C.

2731.01. “When a mandamus petitioner fails to name any party who can grant the relief he seeks in his petition, the petition is 4 ‘fatally defective’ and subject to dismissal.” State ex rel. Lagway v. Williams, 2026-Ohio-1014, ¶ 2 (9th Dist.), quoting State ex rel. Johnson v. Jensen, 2014-Ohio-3159, ¶ 5. {¶8} Mr. Huffman seeks to compel Judge Rickett to issue an order in each of the ten remaining municipal court cases identified in his amended complaint.

A review of the dockets in those matters reveals that Judge Rickett did not preside over the following seven cases: 2015 CR- B 000245, 2018 CR-B 000667, 2018 CR-B 000988, 2018 CR-B 001455, 2018 CR-B 001460, TRD-11-12-10838, and CRB-11-11-01633. See State ex rel. Neguse at ¶ 18. Notably, Judge Rickett filed with this Court a copy of a journal entry in which he explained that the foregoing cases were “not assigned to [him] and [were] not on [his] docket for any consideration.” Mr. Huffman attached that same journal entry to several of his own filings in this Court.

Nevertheless, he never sought to amend his complaint to add any additional respondent(s). Insofar as the amended complaint concerns seven cases over which Judge Rickett did not preside, it “‘fails

to state a claim in mandamus because [Mr. Huffman] did not name any respondent who could grant the relief he seeks.” State ex rel. Lagway at ¶ 4, quoting State ex rel.

Adams v. Winkler, 2022- Ohio-271, ¶ 14. Accordingly, the amended complaint is dismissed as to Case Nos. 2015 CR-B 000245, 2018 CR-B 000667, 2018 CR-B 000988, 2018 CR-B 001455, 2018 CR-B 001460, TRD- 11-12-10838, and CRB-11-11-01633.

The Remainder of the Amended Complaint is Dismissed {¶9} “For a writ of mandamus to issue, a relator must demonstrate that (1) the relator has a clear legal right to the relief prayed for, (2) respondent is under a corresponding clear legal duty to perform the requested acts, and (3) relator has no plain and adequate legal remedy.” State ex rel. Serv. Emp. Internatl.

Union, Dist. 925 v. State Emp. Relations Bd., 81 Ohio St.3d 173, 176 (1998). As discussed below, after presuming the truth of all material factual allegations in the 5 amended complaint and making all reasonable inferences in Mr. Huffman’s favor, it appears beyond doubt that he can prove no set of facts entitling him to mandamus relief. {¶10} A review of the dockets in Mr. Huffman’s three remaining municipal court cases reveals the following information.

See State ex rel. Neguse, 2020-Ohio-3533, at ¶ 18. In Case No. 2021 CR-B 000912, he was convicted of a first-degree criminal misdemeanor and a fourth-degree criminal misdemeanor. In Case No. 2021 CR-B 001471, he was convicted of a fourth-degree criminal misdemeanor.

Finally, in Case No. 2023 CR-B 000137, he was convicted of a first-degree criminal misdemeanor. In each case, the municipal court issued a registration block to the bureau of motor vehicles due to the nonpayment of fines and/or costs. See Former R.C. 1901.44. {¶11} The amended complaint alleges that, pursuant House Bill 29 and R.C. 4510.22, Mr. Huffman has a clear legal right to the removal of the vehicle registration blocks placed on him.

As previously noted, House Bill 29 took effect in April 2025. Relevant to this appeal, the bill amended R.C. 1901.44. Under the current version of the statute, a municipal court no longer has the authority to issue a vehicle registration block due to nonpayment of a court-ordered debt. See R.C. 1901.44. According to Mr. Huffman, Section 5 of House Bill 29 made that change retroactive and expressly mandated the removal of any debt-based registration blocks. {¶12} Section 5 of House Bill 29 addressed the removal of previously imposed vehicle registration blocks.

It provided, in relevant part, as follows: Section 5. (A) Not later than thirty days after the effective date of this section, the Registrar of Motor Vehicles shall remove any suspensions of an individual’s... motor vehicle registration that were imposed under section 4510.22 of the Revised Code, prior to the effective date of this section, for failure to pay a court fine or fee.

(B) Not later than thirty days after the effective date of this section, the Registrar shall create a list of individuals whose... motor vehicle registration is suspended under section 2935.27 of the

Revised Code for failure to pay a court fine or fee.

The Registrar shall notify the courts that suspended those individuals'... motor vehicle registrations of the individuals' names and suspension. The courts shall 6 order the Registrar to remove the suspensions associated with section 2935.27 of the Revised Code for those individuals. House Bill 29, Section 5(A)-(B). Section 5 did not address retroactivity or the removal of vehicle registration blocks imposed under R.C.

1901.44 for criminal misdemeanors. {¶13} Presuming the truth of all material factual allegations in the amended complaint and making all reasonable inferences in Mr. Huffman's favor, it appears beyond doubt that he cannot prove the existence of a clear legal right to the relief he seeks. Mr. Huffman was not convicted of a motor vehicle offense under R.C. Chapter 4510 in his three remaining cases.

See House Bill 29, Section 5(A). See also R.C. 4510.22 (applying to license blocks for motor vehicle- related offenses). Nor was he convicted of minor misdemeanors such that R.C. 2935.27 applied to him. See House Bill 29, Section 5(B).

As previously noted, Mr. Huffman was convicted of criminal misdemeanors. While Section 5 of House Bill 29 mandated the removal of previously imposed registration blocks in the case of motor vehicle offenses and minor misdemeanors, it did not do so for criminal misdemeanors.

Thus, it appears beyond doubt that Mr. Huffman cannot prevail on the facts alleged in the amended complaint. For the foregoing reasons, the case is dismissed. In light of the dismissal, Mr. Huffman's motion for summary judgment is moot. See *State ex rel. Smith v. Rothal*, 2002 WL 386393, *3 (9th Dist. Mar. 5, 2002). Conclusion {¶14} The case is dismissed. All outstanding motions are denied.

Costs of this action are taxed to Mr. Huffman. The clerk of courts is hereby directed to serve upon all parties not in default notice of this judgment and its date of entry upon the journal. See Civ.R. 58(B). JILL FLAGG LANZINGER FOR THE COURT 7 SUTTON, J. STEVENSON, J. CONCUR. APPEARANCES: CODY HUFFMAN, Pro Se, Relator. ANGELA WYPASEK, Prosecuting Attorney, and THOMAS M. McCARTY, Assistant Prosecuting Attorney, for Respondent.