

SUPREME COURT OF OHIO

State ex rel. Bates v. Copley

2026-Ohio-1270 · No. 2025-1267 · Decided April 10, 2026

SUMMARY

The Supreme Court of Ohio affirmed the dismissal of Robert Bates’s mandamus complaint against a Toledo Correctional Institution employee. The court held that Bates failed to strictly comply with R.C. 2969.25(A) because his affidavit of prior civil actions did not identify every party in several listed cases, and it denied his motion for reversal based on the appellee’s failure to file a brief.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per Curiam; Chief Justice Kennedy; Justice Fischer; Justice DeWine; Justice Brunner; Justice Deters; Justice Hawkins; Justice Shanahan
JURISDICTION	Supreme Court of Ohio
DECIDED	April 10, 2026
DOCKET	2025-1267
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal as of right from the Sixth District Court of Appeals' sua sponte dismissal of an inmate's mandamus complaint for failure to comply with R.C. 2969.25(A).
STANDARD OF REVIEW	The Supreme Court reviewed whether the court of appeals properly dismissed the complaint for noncompliance with the mandatory requirements of R.C. 2969.25(A), and whether Bates's brief reasonably appeared to sustain reversal under S.Ct.Prac.R. 16.07(B).
PRECEDENTIAL VALUE	Published
PARTIES	Robert Bates v. R. Copley

TOPICS

- civil procedure
- appellate procedure
- remedies
- standard of review

PRACTICE AREAS

- civil procedure
- appellate procedure
- mandamus
- public records

QUESTIONS PRESENTED

1. Whether Bates strictly complied with R.C. 2969.25(A)(3) by identifying the name of each party to every prior civil action listed in his inmate affidavit.
2. Whether the Sixth District Court of Appeals properly dismissed Bates's mandamus complaint sua sponte for noncompliance with R.C. 2969.25(A).
3. Whether Bates was entitled to reversal under S.Ct.Prac.R. 16.07(B) because Copley did not file a merit brief.
4. Whether the Supreme Court should reach the merits of Bates's mandamus and statutory-damages claims.

HOLDINGS

1. R.C. 2969.25(A) is mandatory and requires strict compliance; under R.C. 2969.25(A)(3), an inmate's affidavit must identify the name of each party to each prior civil action listed.
2. The Sixth District properly dismissed Bates's mandamus complaint sua sponte because his affidavit failed to strictly comply with R.C. 2969.25(A)(3).
3. Bates was not automatically entitled to judgment or reversal merely because Copley failed to file a merit brief; reversal under S.Ct.Prac.R. 16.07(B) requires that the appellant's brief reasonably appear to sustain reversal.
4. The merits of Bates's mandamus and statutory-damages claims were not properly before the Supreme Court because the court of appeals dismissed the action on procedural grounds and did not adjudicate the merits.

KEY QUOTATIONS

“R.C. 2969.25 is mandatory and requires strict compliance.” (¶ 6)

“Hunter is not automatically entitled to judgment in his favor; he must demonstrate that he is reasonably entitled to reversal.” (¶ 10)

“We therefore deny Bates’s motion.” (¶ 11)

FACTUAL BACKGROUND

Bates, an inmate at the Toledo Correctional Institution, submitted two written requests seeking the names of two prison officers. After the requests were denied, he filed a mandamus complaint against a prison business-office supervisor. Bates's affidavit of prior civil filings identified 16 prior cases but failed to list every defendant in several of those cases, including three federal actions.

PROCEDURAL HISTORY

Bates filed a mandamus complaint in the Sixth District Court of Appeals seeking officer names and statutory damages under Ohio's Public Records Act. The court of appeals dismissed the complaint sua sponte after finding that Bates's affidavit of prior civil actions did not identify every party to each listed action. Bates appealed to the

Supreme Court of Ohio, and after Copley failed to file a merit brief, Bates moved for reversal under S.Ct.Prac.R. 16.07(B).

DISPOSITION

affirmed

CASES CITED

- State ex rel. Adkins v. Dept. of Rehab. & Corr. Legal Dept., 2024-Ohio-5154, ¶ 15
- State ex rel. Ware v. Akron Police Dept., 2025-Ohio-1198, ¶ 14
- State ex rel. Swanson v. Ohio Dept. of Rehab. & Corr., 2019-Ohio-1271, ¶ 6
- State ex rel. Parker Bey v. Bur. of Sentence Computation, 2022-Ohio-236, ¶¶ 14, 19
- State ex rel. Parker v. Ohio Adult Parole Auth., 2023-Ohio-2558, ¶ 13
- State ex rel. Watkins v. Andrews, 2015-Ohio-1100, ¶ 8
- State ex rel. Hunter v. Binette, 2018-Ohio-2681, ¶ 10