

COURT OF APPEALS OF OHIO, ELEVENTH APPELLATE DISTRICT,
TRUMBULL COUNTY

Sawyer v. Blume

2026-Ohio-2045 · No. 2026-T-0031 · Decided June 1, 2026

SUMMARY

The Eleventh District Court of Appeals of Ohio dismissed the appeal sua sponte for lack of a final appealable order. The trial court had merely adopted a magistrate’s decision without issuing a separate and independent judgment, and therefore the appellate court lacked jurisdiction.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eleventh Appellate District, Trumbull County
WRITING FOR THE COURT	John J. Eklund; Eugene A. Lucci; Scott Lynch
JURISDICTION	Court of Appeals of Ohio, Eleventh Appellate District, Trumbull County
DECIDED	June 1, 2026
DOCKET	2026-T-0031
DISPOSITION	dismissed
PROCEDURAL POSTURE	Interlocutory appeal dismissed sua sponte for lack of a final appealable order.
STANDARD OF REVIEW	De novo review of appellate jurisdiction and whether the order appealed from is final and appealable.
PRECEDENTIAL VALUE	Published
PARTIES	Guy A. Blume, Melanie D. Holscher, Wholesome Strategies, L.L.C., d.b.a. Jefferson Poultry v. Lynette J. Sawyer, Got Your Sixx, L.L.C.

TOPICS

- final judgment rule
- appellate jurisdiction
- appellate procedure
- civil procedure
- foreclosure

PRACTICE AREAS

- appellate procedure
- civil procedure
- foreclosure

QUESTIONS PRESENTED

1. Whether the March 12, 2026 trial-court entry constituted a final appealable order.
2. Whether the Court of Appeals had jurisdiction over an appeal from a trial-court entry that merely adopted a magistrate's decision.

HOLDINGS

1. A trial court's mere adoption or incorporation by reference of a magistrate's decision does not constitute a final appealable order. The trial court's entry and the magistrate's decision must be separate and distinct, complete and independent documents, and the entry must contain an independent judgment disposing of the issues between the parties.
2. The Court of Appeals lacked jurisdiction over the appeal because the order appealed from was not a final appealable order, requiring sua sponte dismissal.

KEY QUOTATIONS

“Rather, the trial court’s entry and the magistrate’s decision must be separate and distinct documents that are complete and independent of each other.” (¶ 4)

“Accordingly, based upon the foregoing analysis, this appeal is hereby sua sponte dismissed for lack of a final appealable order.” (¶ 6)

FACTUAL BACKGROUND

Sawyer brought a foreclosure action against Blume and Holscher. Wholesome Strategies filed a third-party complaint against Got Your Sixx, and the magistrate issued a decision dismissing those claims. The trial court overruled objections but merely adopted the magistrate's decision without entering its own separate and independent judgment.

PROCEDURAL HISTORY

Sawyer filed a foreclosure complaint against Blume and Holscher. Wholesome Strategies filed a third-party complaint against Got Your Sixx, and the magistrate dismissed those third-party claims. After the trial court overruled appellants' objections and merely adopted the magistrate's decision, appellants appealed. The Court of Appeals dismissed the appeal because the trial court had not entered a separate, distinct, and independent final judgment.

DISPOSITION

dismissed

CASES CITED

- Tamarac Apts., L.L.C. v. Austin, 2025-Ohio-2737, ¶ 4 (11th Dist.)
- Salyers v. Salyers, 2024-Ohio-5656, ¶ 2 (11th Dist.)
- Perkins v. Perkins, 2025-Ohio-510, ¶ 6 (11th Dist.)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/court-of-appeals-of-ohio-eleventh-appellate-district-trumbull-county-court-of-appeals-of-ohio-eleven/2026/sawyer-v-blume-gxhcceg0>