

COURT OF APPEALS OF OHIO, FOURTH APPELLATE DISTRICT, ADAMS COUNTY

Mapes v. Gibbs

2026-Ohio-1407 · No. Adams App. No. 25CA1211 · Decided April 8, 2026

SUMMARY

The Fourth District Court of Appeals of Ohio affirmed an Adams County Court judgment granting Joyce Mapes possession of rental property in a forcible entry and detainer action and denying Ewing “Toby” Gibbs’s counterclaim concerning an alleged land contract. The court held that the county court had subject-matter jurisdiction to consider the counterclaim seeking equitable enforcement of the alleged land contract and that the county court’s \$15,000 monetary limit did not apply. The court overruled Gibbs’s assignment of error challenging the denial of his motion to transfer the case to the court of common pleas.

CASE DETAILS

COURT	Court of Appeals of Ohio, Fourth Appellate District, Adams County
WRITING FOR THE COURT	Kristy S. Wilkin; Smith, P.J.; Hess, J.
JURISDICTION	Court of Appeals of Ohio, Fourth Appellate District, Adams County
DECIDED	April 8, 2026
DOCKET	Adams App. No. 25CA1211
DISPOSITION	affirmed
PROCEDURAL POSTURE	Gibbs appealed an Adams County Court judgment granting Mapes possession in a forcible-entry-and-detainer action, denying Gibbs's counterclaim based on an alleged land contract, and refusing to transfer the case to the Adams County Court of Common Pleas.
STANDARD OF REVIEW	Subject-matter jurisdiction is reviewed de novo without deference to the trial court.
PRECEDENTIAL VALUE	Published Ohio appellate opinion
PARTIES	Ewing “Toby” Gibbs v. Joyce Mapes

TOPICS

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QUESTIONS PRESENTED

1. Whether the Adams County Court had subject-matter jurisdiction over the forcible entry and detainer action and Gibbs's counterclaim seeking enforcement of an alleged land contract.
2. Whether the counterclaim required certification or transfer of the action to the Adams County Court of Common Pleas because of the amount or nature of the claimed property interest.
3. Whether the trial court erred by denying Gibbs's motion to transfer and granting Mapes's forcible entry and detainer claim.

HOLDINGS

1. An Ohio county court has subject-matter jurisdiction to adjudicate a forcible entry and detainer action and a related counterclaim involving equitable enforcement of an alleged land contract when the counterclaim seeks equitable relief rather than a monetary amount exceeding the county court's jurisdictional limit.
2. The trial court did not err in denying Gibbs's motion to transfer because the county court had subject-matter jurisdiction over both the forcible entry and detainer action and the related land-contract counterclaim.

KEY QUOTATIONS

“County Courts are a statutory creation with “only limited jurisdiction and may exercise only such powers as are directly conferred by legislative action.”” (¶ 10)

“Thus, the Court concluded that the municipal court had subject matter jurisdiction to determine that the agreement between the parties was a land contract, as opposed to a lease, and to equitably award the property to appellee pursuant to that land contract.” (¶ 17)

“Applying the rationale relied upon in Behrle in the instant case, we find that the county court had subject matter jurisdiction and did not exceed its \$15,000 limit.” (¶ 20)

FACTUAL BACKGROUND

Mapes owned or controlled the rental property at issue in Peebles, Ohio, and sought to evict Gibbs after informing him that she no longer wished to rent the property. Gibbs allegedly threatened to burn the property and claimed that he had purchased it under a \$45,000 land contract that he was still paying. After hearing testimony and reviewing exhibits, the county court found that Gibbs was a tenant and that the evidence did not establish a land contract or oral contract to purchase the property.

PROCEDURAL HISTORY

Mapes filed a forcible entry and detainer action to evict Gibbs from rental property. Gibbs answered, asserted affirmative defenses, counterclaimed that he owned the property under a \$45,000 land contract, and moved to transfer the case to the court of common pleas. After an evidentiary hearing, the Adams County Court found insufficient evidence of a land contract or oral purchase agreement, denied the transfer motion, granted Mapes possession, and denied the counterclaim. The Fourth District affirmed.

DISPOSITION

affirmed

CASES CITED

- Haas v. Gerski, 175 Ohio St. 212
- Bowshier v. Bowshier, 2013-Ohio-297, ¶ 24
- In re Adoption of Reed, 2006-Ohio-2094, ¶ 16 (4th Dist.)
- State ex rel. Tubbs Jones v. Suster, 84 Ohio St.3d 70, 73 (1998)
- Hall v. Tucker, 2005-Ohio-2674, ¶ 50
- Burns v. Daily, 114 Ohio App.3d 693, 702 (11th Dist. 1996)
- State ex rel. Johnson v. Perry Cty. Court, 25 Ohio St.3d 53, 54 (1986)
- Behrle v. Beam, 6 Ohio St.3d 41 (1983)