

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO
CIVIL DIVISION

NADEZHDA WOOD,	:	
	:	CASE NO.: 23CV4452
Plaintiff,	:	
	:	JUDGE: David C. Young
v.	:	
VIACHESLAV KOVALKOV, <i>et al</i> ,	:	
	:	
Defendants.	:	

**BRIEF IN OPPOSITION TO DEFENDANTS' SECOND MOTION
FOR CONTINUANCE OF EVICTION HEARING**

Plaintiff, Nadezhda Wood, opposes Defendants' Second Motion to Continue Hearing and asks the Court to deny the Defendants' Motion.

Denying the motion and eliminating further delays is warranted here because pursuant to Ohio R.Civ 1(B), the Court shall "effect just results by eliminating delay, unnecessary expenses and all other impediments to the expeditious administration of justice." Defendants have already postponed this eviction hearing for most of the year and further delays unduly prejudice the Plaintiff. Defendants have known since February that their tenancy has been terminated. Defendants have known since April that the Plaintiff has initiated the forcible detainer action against them in the municipal court. Defendants have already convinced the municipal court to postpone their eviction hearing once, back in April. Defendants then filed counterclaims, triggering the transfer

of the case from the municipal court to the Court of Common Pleas delaying an otherwise expedited, summary proceeding. Defendants then engaged in motion practice, attempting to add—and then drop— completely unrelated claims. Now they ask for yet another extension, claiming that Plaintiff has not sought a hearing before they purchased tickets. Plaintiff has done nothing but seek a hearing and attempt to evict Defendants who are now taking a leisure trip to Europe. Further delay is also unnecessary since Defendants can appear remotely. Ohio Civ.R 43(A) allows Plaintiff to appear in this Court by remote presence “[f]or good cause and with appropriate safeguards.” Defendants being out of the country constitutes good cause and Plaintiff does not oppose to them appearing remotely.

Finally, Defendants are able to re-schedule their trip. The attachments to their motion show that they purchased SAS Go Light tickets, which allow for rebooking.¹ It is not too late to change the dates of their trip: SAS rebooking policy allows for changes to tickets up to 1 hour before departure and for up to 361 days ahead of time.² Meaning, if they want to appear in person rather than by remote presence, Defendants can still change their flights to a later date and go at any time in the year following the hearing.

¹ See SAS webpage, Ticket Types, <https://www.flysas.com/us-en/fly-with-us/ticket-options/ticket-types/> (last accessed Oct. 4, 2023).

² See SAS webpage, Change Your Ticket, <https://www.flysas.com/us-en/customer-service/rebook-change-ticket/> (last accessed Oct. 4, 2023).

Plaintiff is ready and willing to participate in the hearing on October 25. Because further delay would be unjust and prejudice Plaintiff, and Defendants have an option of appearing remotely or postponing their trip, Plaintiff respectfully asks the Court to deny their motion for continuance.

Respectfully submitted,

/s/: ALEX J. CASTLE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed with the Court and served upon the below parties and or Counsel of record this same day of filing electronically through the Court’s CM/ECF System, and electronic mail, pursuant to Civ.R. 5(B)(2)(f).

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TICKET TYPES

You can tailor your journey to your needs with our different ticket types. The ticket options differ in flexibility to changes and refund, the option to select your seat in advance, the number of points you'll earn, as well as services included in the ticket price.

TICKET OPTIONS SAS GO

SAS Go Light

SAS Go Light is an option when you want to travel light and affordably. Travelling with less baggage lowers fuel consumption and flight emissions, making it more sustainable.

With this ticket option you'll get an allocated seat when you check in and you can bring a small bag, such as a small handbag or laptop or similar, the bag must fit under the seat in front of you.

If you're under 26, you can book [SAS Youth Go light](/us-en/fly-with-us/youth-tickets/) [\[/us-en/fly-with-us/youth-tickets/\]](/us-en/fly-with-us/youth-tickets/).

SERVICES & CONDITIONS

- [Underseat bag](/us-en/travel-info/baggage/carry-on/) [\[/us-en/travel-info/baggage/carry-on/\]](/us-en/travel-info/baggage/carry-on/)
- [Rebooking](/us-en/customer-service/rebook-change-ticket/) [\[/us-en/customer-service/rebook-change-ticket/\]](/us-en/customer-service/rebook-change-ticket/) permitted for a fee
- Non-refundable

AVAILABILITY

- On flights within and to/from Scandinavia, to/from Europe
 - On flights to/from Asia and US 1 x carry-on is included in the ticket
-

SAS Go Smart

SAS Go Smart is the option when you need to travel with baggage.

With this ticket option you can choose a seat when you check-in, you can bring baggage and rebook your ticket for an additional fee.



CHANGE YOUR TICKET

Whether you need to reschedule your travel dates or update traveler names, we have all the information you need.

TRAVEL DATE OR TIME

REBOOKING POLICY

- SAS regular tickets can be rebooked up to 1 hour before departure.
- SAS Bonus tickets can be rebooked up to departure, provided the points are still valid.
- If you're rebooking on a flight that costs more than your original ticket, you'll need to pay the difference.
- You can rebook for regular tickets on a new flight 361 days ahead and for SAS Bonus tickets 330 days ahead or according to availability.
- A rebooking fee may apply. The fee will be based on the ticket rules.

If you've booked via a travel agent / travel website, please contact them for available options.

REBOOKING FEE

- You enjoy unlimited free rebooking for SAS Go Pro, SAS Plus Pro and SAS Business Pro tickets.
- For SAS Bonus tickets, a rebooking fee per traveler and flight will apply:
 - Domestic and European flights: 25 EUR/250 SEK/250 NOK/175 DKK/25 USD/32 CAD
 - To/from Asia and North America: 75 EUR/750 SEK/750 NOK/525 DKK /75 USD/96 CAD
- For all other ticket types, a rebooking fee from 650 DKK/NOK/SEK (or the equivalent in the local currency) will apply per traveler and flight.

In addition to the rebooking fee, a fare difference (if any) may apply.

HOW TO REBOOK

- Go to [My bookings \[us-en/managemybooking/\]](#)
- Enter your booking reference and last name, or log in.
- Open the booking and click "Change booking".
- Select the flight you'd like to rebook.
- Choose the new travel date or time and continue to payment.
- Enter your payment details and confirm the change.

If you're not able to rebook yourself, just [contact us \[us-en/customer-service/contact/\]](#) for help.

PASSENGER NAME

NAME CHANGE POLICY

You can change the name on an unused ticket for a flight operated by SAS, for example, to make a correction or transfer your ticket to another traveler.

Please note:

- SAS regular tickets and SAS Bonus tickets can be changed up to 1 hour before departure.
- It's not possible to change passenger type (e.g. adult, child, youth).

NAME CHANGE FEES

For all tickets, the fee is 600 DKK/NOK/SEK (or the equivalent in the local currency) per traveler.

HOW TO CHANGE

To change the name on your ticket, contact [SAS Customer Service \[us-en/customer-service/contact/\]](#)