

Endnotes

ⁱ O.R.C. § 5302.20(C)(5)

ⁱⁱ O.R.C. section 5815.33(A)

ⁱⁱⁱ O.R.C. section 5815.33(B)

^{iv} *Holycross v. Holycross*, 112 Ohio St. 3d 203(2007)

^v *Beck v. Dobrinski*, No. 99CA007309 9th Dist. (Apr. 26, 2000), at 4, (citing *Ferguson v. Owens* (1984), 9 Ohio St. 3d 223, 225).

^{vi} *Id.* at 4 (citing *Ferguson*, 9 Ohio St. 3d at 225,26)

^{vii} *Id.* at 4, quoting *Kelly Medical Life In. Co.* (1987), Ohio St. 3d 130, ¶2.

^{viii} *State v. Eppinger* (2001), 91 Ohio St. 3d 158, 164 quoting *Cross v. Ledford* (1954), 161 Ohio St. 469, 477

^{ix} *Eppinger*, 91 Ohio St. 3d at 164, quoting *Cross*, 161 Ohio St. at 477.

^x *Crites v. Anthem Life Ins. Co.* 2014-Ohio-1682(Ohio C. App. 2014).