

THIS COMMUNICATION IS FROM A DEBT COLLECTOR
IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO
Civil Division

CASE NO. _____

CAPITAL ONE AUTO FINANCE
7933 PRESTON ROAD
PLANO, TX 75024
PLAINTIFF,

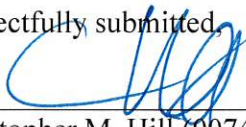
V.

ISSIAH DOOLEY
4074 RAFT LANE
OBETZ, OH 43207
DEFENDANT,

MOTION FOR ORDER OF POSSESSION

Now comes Capital One Auto Finance ("Plaintiff"), and respectfully moves this Court for an Order of Possession of property which Plaintiff owns and which is presently in possession of Issiah Dooley ("Defendant"). Plaintiff requests this Court to order delivery of 2020 Nissan Altima, VIN 1N4BL4CVXLN321622 ("Vehicle"), including accessories, from the possession of Defendant, located at 4074 Raft Lane, Obetz, OH 43207, to Plaintiff, pursuant to O.R.C. §2737. The grounds for this Motion are more fully set forth in the Memorandum and the Affidavit attached hereto.

Respectfully submitted,



Christopher M. Hill (0074838)
Hill, Cain and McDonald, LLP
641 Teton Trail/P.O. Box 817
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Counsel for Plaintiff

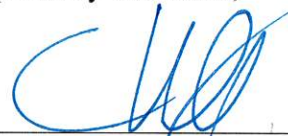
MEMORANDUM IN SUPPORT

Capital One Auto Finance ("Plaintiff") moves this Court, pursuant to O.R.C. §2737.03, to obtain possession of specific property, a 2020 Nissan Altima, VIN 1N4BL4CVXLN321622 ("Vehicle"), including accessories, presently located at 4074 Raft Lane, Obetz, OH 43207. O.R.C. §2737.03 provides that a party to an action involving a claim for recovery of personal property may, under the relevant provisions, move the Court for an Order of Possession of the property. O.R.C. §2737.03 further requires the moving party to attach to the Motion an Affidavit containing all of the information required in the statute. Such an Affidavit is attached hereto.

To prevail upon the Motion for recovery of the Vehicle, Plaintiff must demonstrate only that probable cause exists to support its claim. The Affidavit supplies evidentiary facts demonstrating that probable cause exists in this case and that Plaintiff is appropriately entitled to possession of the Vehicle it seeks through replevin.

WHEREFORE, Plaintiff requests that the Court find the Motion for an Order of Possession to be well-taken and that it sustain the same.

Respectfully submitted,



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Counsel for Plaintiff

STATE OF KENTUCKY }
 }
COUNTY OF FRANKLIN }

AFFIDAVIT

The Affiant, Christopher M. Hill, being first duly sworn, deposes and states as follows:

1. The undersigned is legal counsel for the movant in this action, Capital One Auto Finance ("Plaintiff"), who is seeking recovery of a 2020 Nissan Altima, VIN 1N4BL4CVXLN321622 ("Vehicle"), including accessories.
2. That the Plaintiff has a properly perfected security interest in this Vehicle. Copies of the Retail Installment Sale Contract ("Contract") and Ohio Vehicle Record ("Title") are attached to the Complaint, which was contemporaneously filed herewith, as **Exhibits "A" and "B"**, respectively.
3. That, upon information and belief Issiah Dooley ("Defendant"), obtained possession of this property when the Contract was signed on April 30, 2022, and that the continued detention of the Vehicle is wrongful since there has been a default on the terms of the Contract.
4. That the respondent has a current arrearage, owed to Plaintiff, in the amount of \$20,116.93.
5. That the Plaintiff knows of no reason why Defendant may claim that the detention is not wrongful.
6. That, upon information and belief, the property is being used by Defendant for transportation.
7. That Plaintiff will be damaged in the amount of \$12,150.00 the estimated actual value of the property, if the relief sought is not granted.
8. That, upon information and belief, the Vehicle is currently located at 4074 Raft Lane, Obetz, OH 43207; and Defendant may be in the possession of the Vehicle.

9. That this property was not taken for tax, assessment, or fine pursuant to statute, or seized under execution of judgment against the property of the Plaintiff.

Further the Affiant saith naught.



Christopher M. Hill
Ohio Bar 74838
Legal Counsel for Plaintiff

Sworn to and subscribed before me, a Notary Public, on this 9th day of June, 2025.



Notary Public

Name: Kristina L. Burchell
My Commission Expires: 4/19/2029
ID: KYNP27302