

No. 26-308

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

CHRISTINA LOUISE KNOWLTON,

Petitioner,

v.

TITUS GLENN DONNELL, et al.,

Respondents.

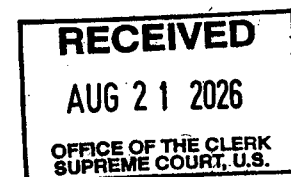
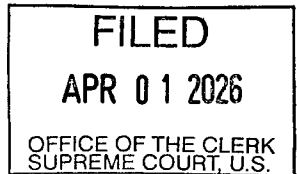
ON PETITION FOR WRIT OF CERTIORARI
TO THE OHIO COURT OF APPEALS, 10TH DISTRICT

PETITION FOR A WRIT OF CERTIORARI

Christina Louise Knowlton
123 Hope Circle
Hebron, OH 43025

Pro Se, Petitioner

April 1, 2026



1. Whether an attorney breaches fiduciary duties and acts outside the scope of a contingent fee agreement when the attorney fails to file the client's claim within the applicable statute of limitations and later files the agreement with a printed name and date not authorized or provided by the client.

2. Whether an attorney violates professional obligations when the attorney files a voluntary dismissal "by and through counsel" without the client's knowledge or consent.

3. Whether repeated failures by counsel to communicate with the client, including failure to disclose the statute of limitations deadline, failure to provide necessary communication accommodation, and failure to consult on major litigation decisions, deprive the client of meaningful participation in the case.

4. Whether a court may rely on filings submitted by counsel when the client disputes that the filings were authorized and alleges that counsel altered or completed portions of a contingent fee agreement without the client's knowledge.

LIST OF PARTIES

The parties to the proceedings below whose judgments are sought to be reviewed are:

Petitioner:

Christina L. Knowlton

Respondents:

Matthew T. Wolf

Titus G. Donnell

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RELATED PROCEEDINGS

Knowlton v. Donnell, et al., Franklin County Court of
Common Pleas, Case No. 24CV000485.

Knowlton v. Donnell, et al., Tenth District Court of
Appeals, Case No. 25AP-247.

Knowlton v. Donnell, et al., Supreme Court of Ohio, Case
No. 2025-1111.

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OPINIONS BELOW

The judgment of the Tenth District Court of Appeals of Ohio in Knowlton v. Donnell, et al., Case No. 25AP-247 (July 14, 2025), is reproduced in Appendix A.

The orders of the Supreme Court of Ohio in Case No. 2025-1111 (October 28, 2025, and January 6, 2026) are reproduced in Appendix B and Appendix C.

STATEMENT OF JURISDICTION

The judgment of the Tenth District Court of Appeals of Ohio was entered on July 14, 2025. The Supreme Court of Ohio declined jurisdiction on October 28, 2025, and denied further review on January 6, 2026.

This Court has jurisdiction under 28 U.S.C.

§ 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS
INVOLVED

U.S. Const. amend. I

U.S. Const. amend. V

U.S. Const. amend. XIV, § 1

28 U.S.C. § 1257(a)

42 U.S.C. § 1983

42 U.S.C. § 12132

STATEMENT OF THE CASE

Petitioner, who is deaf, began employment on August 25, 2014.

On October 12, 2015, Petitioner entered into a contingent fee agreement governing representation in connection with the underlying legal matter.

On January 13, 2016, Petitioner's employment ended.

On October 10, 2017, Petitioner received an email from an Office Manager confirming employment dates.

On July 20, 2018, an Amended Notice to Take Deposition was filed in the underlying matter.

On January 22, 2024, Petitioner filed a complaint in the Franklin County Court of Common Pleas.

On June 13, 2025, Petitioner filed a concise brief through the court's electronic filing system.

On June 25, 2025, the Court issued a journal entry concerning briefing and filing procedures.

On July 14, 2025, the Tenth District Court of Appeals issued an order in Case No. 25AP-247.

On October 28, 2025, the Supreme Court of Ohio issued an order in Case No. 2025-1111

On January 6, 2026, the Supreme Court of Ohio issued a subsequent order in the same case.

STATEMENT OF THE CASE

A. Factual History

Petitioner Christina Louise Knowlton is profoundly deaf and communicates primarily through American Sign Language. Throughout the relevant proceedings, she required communication accommodation to participate meaningfully in legal representation and court processes.

Beginning in 2015, Petitioner sought legal representation in connection with civil claims arising from a motor vehicle accident. Petitioner remained represented by counsel for a period of time before that representation ended.

Following the termination of representation, Petitioner attempted to secure new counsel. Petitioner encountered difficulties obtaining representation, including communication barriers related to her deafness.

As a result, Petitioner proceeded without counsel during portions of the underlying litigation and subsequent appellate proceedings.

B. Relevant Procedural History

The underlying events occurred on October 12, 2015. Petitioner was represented by counsel at the time the complaint was filed in 2017 and was later represented by different counsel during subsequent proceedings in 2020. Petitioner's initial counsel withdrew from representation due to financial considerations. Petitioner subsequently retained different counsel in 2020. This petition for a writ of certiorari follows.

On June 13, 2025, Petitioner filed a concise brief in the Tenth District Court of Appeals.

On June 25, 2025, the court issued a journal entry concerning briefing and filing procedures.

On July 14, 2025, the Tenth District Court of Appeals dismissed the appeal in Case No. 25AP-247.

The record reflects that filings on June 27, 2025, and July 2, 2025, were described as identical; however, Petitioner maintains that the June 27 filing was submitted by Petitioner, while the July 2 filing was a duplicate clerk upload which contributed to confusion regarding the record. Petitioner raised this discrepancy in a filing dated August 28, 2025.

On October 28, 2025, the Supreme Court of Ohio declined jurisdiction.

On January 6, 2026, the Supreme Court of Ohio denied further review.

REASONS FOR GRANTING THE WRIT

This case warrants this Court's review because it presents important federal questions concerning procedural due process and meaningful access to the courts when a litigant is profoundly deaf and requires communication accommodations to participate in legal proceedings.

Petitioner proceeded pro se not by choice, but as a result of persistent communication and accessibility barriers that prevented effective participation in the judicial process. These issues implicate the fundamental fairness of the proceedings below.

This case also presents issues concerning whether actions taken were consistent with established legal and ethical obligations governing attorney conduct, including duties arising from a contingent fee agreement. The case further presents issues concerning potential conflicts arising from an attorney acting simultaneously in roles involving employment and legal representation. The circumstances surrounding the termination raise questions about the consistency and propriety of the actions taken.

This case presents the question whether due process is satisfied when a deaf litigant is effectively excluded from meaningful participation in her own case due to lack of adequate communication accommodation.

The issues raised extend beyond Petitioner's individual circumstances and affect deaf and disabled litigants nationwide. Clarification from this Court is needed to ensure consistent standards governing access to justice.

This case is a suitable vehicle for resolving these questions because the record clearly reflects the issues presented and the lower court decisions are final. These issues warrant review by this Court.

CONCLUSION AND PRAYER FOR RELIEF

For the foregoing reasons. Petitioner respectfully
That this Court grant the Petition for a Writ of
Certiorari.

Respectfully submitted,

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Deaf Petitioner, Pro Se