

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS,	)	CASE NO. CV-2016-09-3928
	)	
Plaintiff,	)	JUDGE TODD MCKENNEY
	)	
v.	)	
	)	
KISLING, NESTICO & REDICK, LLC, et	)	
al.,	)	<b><u>DEFENDANTS' RESPONSE TO</u></b>
	)	<b><u>PLAINTIFF'S MOTION FOR LEAVE TO</u></b>
Defendants.	)	<b><u>FILE FIRST AMENDED COMPLAINT</u></b>

Defendants Kisling, Nestico & Redick, LLC and Alberto R. Nestico, and Kisling Legal Group, LLC (“Defendants”) do not oppose Plaintiff’s Motion for Leave to File First Amended Complaint, with the understanding that the remaining Defendants (KNR and Mr. Nestico, as KLG will not be a defendant in the First Amended Complaint) have a right to file a motion to dismiss and/or motion for judgment on the pleadings in response to the First Amended Complaint and that the remaining Defendants do not waive the right to file such motions and/or any defenses or arguments, including, without limitation, any of the defenses and arguments asserted in their Motion for Judgment on the Pleadings filed on October 12, 2016. Allowing Plaintiff’s to file her First Amended Complaint will permit the remaining Defendants to focus and streamline their defenses and arguments in a new motion to dismiss or motion for judgment on the pleadings, rather than seek leave to file a Reply Brief on a Complaint that will likely become moot.

Respectfully submitted,

/s/ Brian E. Roof

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Counsel for Defendants

**CERTIFICATE OF SERVICE**

A copy of the foregoing *Response to Plaintiff's Motion for Leave to File First Amended Complaint* was filed electronically with the Court on this 20<sup>th</sup> day of October, 2016. The parties may access this document through the Court's electronic docket system.

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