

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, Plaintiff, vs. KISLING, NESTICO & REDICK, LLC, <i>et al.</i> , Defendants.	Case No. CV-2016-09-3928 Judge Todd McKenney
PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER	

Plaintiff Member Williams moves under Civ.R. 6(B) for an extension of time of four (4) days—until Friday, October 28, 2016—within which to respond to Defendants' Motion for Protective Order, filed on October 12, 2016. The plaintiff's response is now due on Monday, October 24, 2016.

This motion is necessary due to the undersigned counsel's current workload, which includes an Oral Argument in *Cruz, et al. v. English Nanny & Governess School Inc., et al.*, Eighth Appellate District, Case No. 15-103714, is made with the consent of counsel for Defendants, is made in good faith and not for the purposes of delay, and will not prejudice anyone.

For these reasons, the Court should grant Plaintiff the requested extension.

Dated: October 21, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

The foregoing document was served on all necessary parties by operation of the Court's e-filing system on October 21, 2016.

/s/ Peter Pattakos

One of the Attorneys for Plaintiff