

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 OPPOSITION TO DEFENDANTS' MOTION TO HAVE REQUESTS FOR ADMISSION DEEMED ADMITTED	

Because the Court should permit Named Plaintiff to withdraw and amend her admissions under Civ. R. 36(B), Defendants' Motion to Have Requests for Admission Deemed Admitted should be denied as moot. The factual and legal bases for this position are set forth fully in Plaintiff's Motion to Withdraw and Amend Admissions, filed concurrently with this brief and incorporated herein by reference.

Dated: November 14, 2016

Respectfully submitted,

THE CHANDRA LAW FIRM, LLC

/s/ Peter Pattakos

Subodh Chandra (0069233)

Donald Screen (00440770)

Peter Pattakos (0082884)

1265 W. 6th St., Suite 400

Cleveland, OH 44113-1326

216.578.1700 Phone

216.578.1800 Fax

Subodh.Chandra@ChandraLaw.com

Donald.Screen@ChandraLaw.com

Peter.Pattakos@ChandraLaw.com

Attorneys for Plaintiff Member Williams

CERTIFICATE OF SERVICE

The foregoing document was served on all necessary parties by operation of the Court's e-filing system on November 14, 2016.

/s/ Peter Pattakos

One of the Attorneys for Plaintiff