

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,)	<u>DEFENDANTS' BRIEF IN OPPOSITION</u>
et al.,)	<u>TO PLAINTIFF'S MOTION TO STAY</u>
)	<u>SUMMARY JUDGMENT PROCEEDINGS</u>
Defendants.)	

In response to Plaintiff’s Motion to Stay Summary Judgment Proceedings, Defendants Kisling, Nestico & Redick, LLC, Alberto R. Nestico, and Kisling Legal Group, LLC (“Defendants”) incorporate as if fully rewritten herein their reasons and arguments set forth in Defendants’ Brief in Opposition to Plaintiff’s Motion to Withdraw and Amend Admissions Under Civ.R. 36(B). As set forth in the Brief in Opposition, Plaintiff cannot satisfy the standard for permitting withdrawal of admissions. Therefore, the admissions are binding and there are no questions of material fact that can defeat summary judgment. Accordingly, Plaintiff’s Motion to Stay Summary Judgment Proceedings should be denied and Defendants’ Motion for Summary Judgment should be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of Defendants' Brief In Opposition To Plaintiff's Motion To Stay Summary Judgment Proceedings was filed electronically with the Court on this 23rd day of November, 2016. The parties may access this document through the Court's electronic docket system.

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