

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 Alison Breaux
<p>PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR A HEARING ON OUTSTANDING MOTIONS</p>	

Plaintiff does not oppose Defendants' motion for a hearing, but does take issue with Defendants' contention that the pending motions present issues that are especially "complex." (Defs' Mot. at 2.) A review of the pending motions should make clear that there is nothing special about this case that entitles Defendants to any of the extraordinary requests they've made of this Court. Whether or not the Court schedules a hearing, the eight pending motions may be disposed of simply, as follows:

1. Granting Plaintiff's motion to dismiss Defendants' counterclaims;
2. Granting Plaintiff's motion to withdraw and amend admissions so that this case may be heard on its merits, and staying the related summary judgment proceedings that Defendants prematurely instituted;
3. Denying Defendants' motion to compel, and deciding on the parties' motions for protective orders by entering a confidentiality order and setting a date for the parties to simultaneously

exchange documents so that they may proceed with discovery and with litigating what is actually at issue in this case.

Dated: February 13, 2017

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 February 13, 2017.

/s/ Peter Pattakos

One of the Attorneys for Plaintiff