

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

<p>MEMBER WILLIAMS,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>KISLING, NESTICO & REDICK, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. CV-2016-09-3928</p> <p>Judge Alison Breaux</p>
<p>PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO (1) FILE MOTION TO LIFT GAG ORDER AND RESTORE REMOTE ACCESS TO CASE RECORDS AND (2) OPPOSE DEFENDANTS' MOTION FOR DISCOVERY SANCTIONS</p>	

Named Plaintiff Member Williams and putative Plaintiffs Naomi Wright and Matthew Johnson ("Plaintiffs") respectfully request an extension of time until **May 3** to file their motion to lift the Court's gag order and restore remote access to case records and to oppose Defendants' motion for discovery sanctions.

Plaintiffs' attorney Peter Pattakos has primary responsibility for briefing these issues. Yesterday, his wife delivered a healthy baby boy (a little ahead of schedule). Mr. Pattakos accordingly will be largely unavailable during the coming days. Counsel's senior paralegal, moreover, is out of the office until April 26. Given these circumstances, Plaintiffs ask the Court to extend the deadline to complete these filings.

This morning, Plaintiffs' counsel sent an email to all four of the attorneys who represent Defendants, seeking their consent to this request. As of the late-afternoon filing of this Motion, no response had been received. Defendants will not be prejudiced by the Court's grant of Plaintiffs'

request, however, since it will simply extend the time during which a gag order that benefits Defendants will remain in force.

Dated: April 19, 2017

Respectfully submitted,

THE CHANDRA LAW FIRM, LLC

/s/ Subodh Chandra

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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 April 19, 2017.

/s/ Subodh Chandra

One of the Attorneys for Plaintiff