

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS,

Plaintiff,

vs.

KISLING, NESTICO & REDICK, LLC, *et al.*,

Defendants.

Case No. CV-2016-09-3928

Judge Alison Breaux

**MOTION OF ATTORNEYS SUBODH CHANDRA AND DONALD SCREEN, AND THE CHANDRA LAW FIRM LLC FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFF MEMBER WILLIAMS, AND PUTATIVE PLAINTIFFS NAOMI WRIGHT AND MATTHEW JOHNSON**

Attorneys Subodh Chandra and Donald Screen, and The Chandra Law Firm LLC (collectively "Chandra Law"), respectfully move this Court, under Local Rule 7.20, for leave to withdraw as counsel for Plaintiff in this case. As grounds, Chandra Law states that Attorney Peter Pattakos, who is currently employed by Chandra Law and also represents Plaintiff, is leaving Chandra Law effective today, September 14, 2017, and opening The Pattakos Law Firm LLC, an Akron-based firm. His firm will assume sole responsibility for representing Plaintiffs.

Plaintiff Member Williams and the putative plaintiffs, Naomi Wright and Matthew Johnson, have been informed of Chandra Law's withdrawal and they have granted their permission. By serving this Motion, Chandra Law is providing notice to all counsel of record of this request to withdraw. Chandra Law is therefore in full compliance with Local Rule 7.20.

Attorney Pattakos is, concurrently with this Motion, submitting a notice of change of address to this Court. Assuming this Court grants the present Motion, both it and counsel of record should, after September 15, 2017, discontinue notifications to Chandra Law and thereafter send all pleadings, motions, and orders to Attorney Pattakos at the following address:

The Pattakos Law Firm LLC  
101 Ghent Road  
Fairlawn, Ohio 44333  
P: 330.836.8533  
F: 330.836.8536

Dated: September 14, 2017

Respectfully submitted,

/s/ Subodh Chandra

Subodh Chandra (0069233)

Donald P. Screen (0044070)

THE CHANDRA LAW FIRM LLC

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*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 September 14, 2017.

/s/ Subodh Chandra

*One of the Attorneys for Plaintiff*