

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.)	CASE NO. CV-2016-09-3928
)	
Plaintiffs,)	JUDGE ALISON BREAU
)	
v.)	
)	
KISLING, NESTICO & REDICK, LLC, et al.,)	<u>DEFENDANTS' MOTION TO STRIKE CLASS</u>
)	<u>ALLEGATIONS</u>
Defendants.)	
)	

Pursuant to Ohio Civ. R. 23(D)(1)(d), Defendants respectfully move this Court to issue an Order striking all class allegations in the Third Amended Complaint. The Third Amended Complaint fails to establish that Plaintiffs can satisfy the elements necessary to proceed with any class action claim. Additional discovery would not affect Plaintiffs' ability to certify any of the four proposed class actions. A Memorandum in Support of this motion is attached.

Defendants requests that the Court schedule Oral Argument to address the issues herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing Defendants' Motion to Strike Class Allegations with attached Memorandum was filed electronically with the Court on this 26th day of October, 2017. The parties may access this document through the Court's electronic docket system.

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