IN THE COURT OF COMMON PLEAS SUMMIT COUNTY, OHIO

| MEMBER WILLIAMS, et al., |) | Case No. CV-2016-3928 |
|---|-----|-----------------------|
| Plaintiffs, |) | |
| VS. |) | |
| KISLING, NESTICO & REDICK, LLC, et al., |)) | |
| Defendants. |) | |

PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINE FOR RESPONDING TO DEFENDANTS' MOTION TO STRIKE CLASS ALLEGATIONS IN PLAINTIFFS' CORRECTED THIRD-AMENDED COMPLAINT

The Plaintiffs respectfully move the Court pursuant to Civ. R. 6(B) to enlarge by seven days, until December 8, 2017, the deadline for filing their opposition to the Defendants' Motion to Strike Class Allegations in the Corrected Third Amended Complaint. The Plaintiffs request this extension on account of difficulties faced by the attorney principally charged with responding to the Motion to Strike in moving into his office. As matters now stand, the new office space will not be ready for use when the move takes place the week after the Thanksgiving holiday. This circumstance will severely hamper counsel's ability to work on the opposition to the Motion to Strike before the current deadline, necessitating the seven-day postponement the Plaintiffs now request.

A one-week extension will not meaningfully protract this litigation. It will, however, give the Plaintiffs a full opportunity to address the potentially dispositive issues raised by the Motion to Strike.

Counsel for the Defendants have indicated that they do not oppose the seven-day enlargement sought by the Plaintiffs. The Court should grant this Unopposed Motion to Extend Deadline for responding to Defendants' Motion to Strike Class Allegations in the Corrected Third Amended Complaint.

Respectfully submitted,

/w/ Peter Pattakos

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CERTFICATE OF SERVICE

A copy of the foregoing was filed electronically with the Court this <u>24th</u> day of November, 2017. The parties may access this document through the Court's electronic docketing system.

/s/ Joshua R. Cohen

Joshua R. Cohen