

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIOMEMBER WILLIAMS, et al.,

Plaintiffs,

v.

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

Defendants.

Case No. 2016 09 3928

Judge Patricia A. Cosgrove

**JOINT MOTION TO EXTEND BRIEFING
DEADLINE AND TO CONTINUE THE
MARCH 16, 2018 DISCOVERY HEARING**

NOW COMES Defendants, Kisling, Nestico & Redick, LLC, Alberto R. Nestico, and Robert Redick, and Plaintiffs, by and through undersigned counsel, and hereby jointly move this Court to extend the briefing deadlines set forth by the Court's February 14, 2018 briefing schedule.

In light of the extension of time provided for Plaintiffs to file their Motion to Compel and Motion to Compel and Opposition to Defendants' Motion to Compel, the Parties have agreed to a reciprocal extension and respectfully request that the Court revise the remaining briefing deadlines as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Defendants' response in opposition to Plaintiffs' motion to compel.	March 9, 2018	March 15, 2018
Plaintiffs' (discretionary) deadline to respond to Defendants' motion	March 12, 2018	March 19, 2018

As a result of the requested extension, the Parties additionally move this Court to continue the March 16, 2018 discovery hearing set for this matter and further request a

conference call with the Court to determine a mutually agreeable new date for the hearing. The Parties do not bring this Motion for purpose of delay but to allow a full and complete briefing of the issues that will be presented to the Court.

Based on the foregoing, the Parties respectfully move the Court to revise and extend the briefing deadlines set forth by the Court's February 14, 2018 briefing schedule as outlined above and continue the March 16, 2018 hearing. The Parties will contact the Court to schedule a phone conference to determine a new date for the hearing.

Respectfully submitted,

/s/ James M. Popson

James M. Popson (0072773)

Sutter O'Connell

1301 East 9th Street

3600 Erieview Tower

Cleveland, OH 44114

(216) 928-2200 phone

(216) 928-4400 facsimile

jpopson@sutter-law.com

Counsel for Defendants Kisling,
Nestico & Redick, LLC, Alberto R.
Nestico, and Robert Redick

/s/ Peter Pattakos (via email consent)

Peter Pattakos (0082884)

The Pattakos Law Firm

101 Ghent Road

Fairlawn, OH 44333

Cleveland, OH 44114

330.836.8533 phone

330.836.8536 fax

peter@pattakoslaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Civ.R. 5(B)(2)(f), the undersigned certifies that a copy of the foregoing *Motion for Extension* was filed electronically with the Court on this 7th day of March, 2018. The parties, through counsel, may access this document through the Court's electronic docket system.

/s/ James M. Popson

James M. Popson (0072773)

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,

Plaintiffs,

v.

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

Defendants.

Case No. 2016 09 3928

Judge Patricia A. Cosgrove

**ORDER ON JOINT MOTION TO EXTEND
BRIEFING DEADLINE AND TO
CONTINUE THE MARCH 16, 2018
DISCOVERY HEARING**

This Court finds that Plaintiffs' and Defendants' Joint Motion to Extend Briefing Deadline and to Continue the March 16, 2018 Discovery Hearing is well taken.

THEREFORE, IT IS SO ORDERED that the briefing schedule outlined in the Court's February 14, 2018 is amended and revised as follows:

MARCH 15, 2018: Defendants' response in opposition to motion to compel.

MARCH 19, 2018: Plaintiffs' (discretionary) deadline to respond to Defendants' motion.

IT IS FURTHER ORDERED that the March 16, 2018 Discovery Hearing is hereby continued. The Parties are directed to schedule a conference call with the Court to determine a mutually agreeable new date for the hearing.

JUDGE PATRICIA A. COSGROVE

DATE