

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,)	Case No. 2016 09 3928
)	
Plaintiffs,)	Judge Patricia A. Cosgrove
)	
v.)	
)	
KISLING, NESTICO & REDICK, LLC, et al.,)	<u>DEFENDANTS' MOTION FOR EXTENSION</u>
)	<u>OF TIME TO RESPOND TO PLAINTIFFS'</u>
Defendants.)	<u>MOTION TO COMPEL</u>
)	
)	

Defendants respectfully request an extension of time to respond to Plaintiffs' Motion to Compel. Plaintiffs' Motion to Compel was originally due to be filed on February 5 and Defendants were permitted 30 days to respond. (See Order of January 5, 2018; transcript of proceedings January 5, 2018 at pp. 86-87). After multiple extensions of time, Plaintiffs' brief was ultimately filed on March 1, 2018. The motion is excess of 30 pages and addresses more than 40 specific discovery requests. The motion also contains representations regarding the costs associated with the discovery Plaintiffs seek. Defendants require time to investigate these claims and obtain rebuttal information. Thus, 14 days has proven to be an insufficient time to fully respond.

Defendants seek the full amount of time the Court initially allotted to respond to Plaintiffs' Motion to Compel. This would make the motion due on March 31, 2018. The reduction in time that is currently in place represented a good faith effort to complete the briefing prior to the hearing which had been scheduled for March 16, 2018. The parties are scheduled for a telephone conference next week to reset the hearing date on this motion, and can thus accommodate for the time necessary to respond in scheduling the hearing.

The purpose of this motion is not to cause unnecessary delay, but rather for good cause shown as stated herein. Defense counsel contacted Plaintiffs' counsel this morning and

confirmed Plaintiffs have no objection to this motion. Defendants respectfully request that they be permitted the full 30 days to respond to a Plaintiffs' Motion to Compel that they were initially granted at the January 5, 2018 conference.

Respectfully submitted,

/s/ James M. Popson

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Redick

CERTIFICATE OF SERVICE

Pursuant to Civ.R. 5(B)(2)(f), the undersigned certifies that a copy of the foregoing *Defendants' Motion for Extension of Time* was filed electronically with the Court on this 15th 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)