

**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  
(sitting by assignment)

**NOTICE OF REPLACEMENT  
AFFIDAVIT OF DENNIS REES**

Please take notice of the filing of a replacement Affidavit of Dennis Rees in support of the Brief in Opposition Brief in Opposition to Motion to Compel Aaron Czetli, AMC Investigations, Inc., Eduardo Mateo, Gary Monto and Dennis Rees and Motion to Quash/Motion for Protective Order, which was filed with the Court on March 15, 2018.

Respectfully submitted,

**GRIFFIN LAW, LLC**

/s/ Stephen P. Griffin

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*Attorney for Subpoenaed Non-Party  
Deponents Aaron Czetli, AMC Investigations,  
Inc., Eduardo Mateo, Gary Monto and Dennis  
Rees*

**CERTIFICATE OF SERVICE**

Pursuant to Civ.R. 5(B)(2)(f), the undersigned certifies that a copy of the foregoing *Notice of Replacement Affidavit* was filed electronically with the Court on this 17<sup>th</sup> day of March, 2018. The parties, through counsel, may access this document through the Court's electronic docket system.

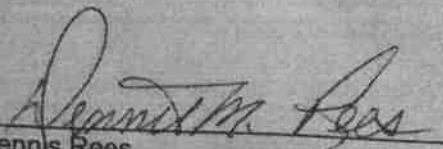
/s/ Stephen P. Griffin  
Stephen P. Griffin, Esq. (0039655)

AFFIDAVIT OF DENNIS REES

The undersigned, Dennis Rees, upon being first duly sworn in accordance with Ohio law, states as follows:

1. I have personal knowledge of all matters set forth within this Affidavit, and am competent to testify thereto and/or upon the same.
2. I am in receipt of a subpoena ("Subpoena") served upon me by the Plaintiffs in *Member Williams, et al. v. Kisling, Nestico & Redick, LLC, et al.*, Summit County Common Pleas Case No. 2016 09 3928.
3. I do not maintain any documents or records responsive to Plaintiffs' numerous requests set forth within the Subpoena pertaining to individual investigative services provided by me.
4. Work was performed upon each of the case files or assignments given to me, but there are no documents in my possession, that pertain to "communication" with any person or agent affiliated with the Kisling, Nestico & Redick law firm, or any of the cases upon which investigative services were performed.
5. The only documents in my possession that would be responsive in any way to the written requests set forth in the Subpoena are my personal tax returns. These documents contain numerous pieces of personal and sensitive information, including, but not limited to, my social security number, home address, personal income amounts, and the account and routing numbers of my bank account.
6. Pertinent to Plaintiffs' efforts to learn how much money was paid to me, any information on my personal tax returns relative to same would also be reflected upon documents prepared by the Kisling, Nestico & Redick law firm, such as a Form 1099.
7. I am currently undergoing treatment for late stage cancer.

FURTHER AFFIANT SAYETH NAUGHT.

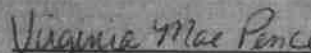
  
Dennis Rees

STATE OF OHIO                    )  
  ) ss:  
COUNTY OF Warren        )

Sworn to and subscribed before me, a Notary Public, Dennis Rees who made himself known to me to be the person signing this Affidavit this 16 day of March, 2018.



Virginia Mae Pence  
Notary Public, State of Ohio  
My Commission Expires  
1-May-22

  
Notary Public  
My commission expires: May 01, 2022