

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,  Plaintiffs,  vs.  KISLING, NESTICO & REDICK, LLC, <i>et al.</i> ,  Defendants.	Case No. CV-2016-09-3928  Judge Patricia A. Cosgrove  <b>Plaintiffs' Unopposed Motion for Extension of Time in which to file a Reply in Support of their Motion to Compel Discovery from the KNR Defendants and a Brief in Opposition to the KNR Defendants' Motion for Protective Order</b>
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Plaintiffs hereby move for an extension of nine days, until Friday, April 20, in which to file a combined reply brief in support of their motion to compel discovery from the KNR Defendants' and a brief in opposition to Defendants' motion for protective order that they filed in combination with their opposition to Plaintiffs' motion to compel.

Plaintiffs request this extension so that they may fully but most concisely address the various issues, including new issues, raised by Defendants in their 31-page brief and supporting documentation in advance of the scheduled May 16 discovery hearing. Plaintiffs' counsel has conferred with counsel for the KNR Defendants who has confirmed that the KNR Defendants do not oppose this motion, which is not being made for the purpose of delay, will not unduly prejudice anyone, and will not postpone any other currently scheduled dates in this litigation. Thus, Plaintiffs respectfully request that the Court grant the nine-day extension.

Respectfully submitted,

/s/ Peter Pattakos

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### **CERTIFICATE OF SERVICE**

The foregoing document was served on all necessary parties by operation of the Court's e-filing system on April 11, 2018.

/s/ Peter Pattakos

*Attorney for Plaintiffs*