

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, Plaintiff, vs. KISLING, NESTICO & REDICK, LLC, <i>et al.</i> , Defendants.	Case No. CV-2016-09-3928 Judge James A. Brogan Plaintiffs' Brief in Opposition to Defendants' Motion to Compel Naomi Wright's Deposition
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Defendants' motion to compel Named Plaintiff Naomi Wright's deposition should be denied because Ms. Wright intends to seek dismissal of her putative class-action claims due to her apparent inability to meet Civ.R. 23's numerosity requirement for class certification. Defendants acknowledge that there is no need to proceed with Ms. Wright's deposition if she seeks dismissal of her claims, which Ms. Wright intends to do by the end of this week in Plaintiffs' impending motion for leave to file a Fourth Amended Complaint.

Dated: September 4, 2018

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 September 4, 2018.

/s/ Peter Pattakos

One of the Attorneys for Plaintiff