IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,	)	Case No. 2016 09 3928
	)	
Plaintiffs,	)	Judge James Brogan
	)	
v.	)	
	)	
KISLING, NESTICO & REDICK, LLC, et al.,	)	**DEFENDANTS' BRIEF IN OPPOSITION TO**
	)	**PLAINTIFFS' MOTION FOR A STATUS**
Defendants.	)	**CONFERENCE AND EXTENSION OF THE**
	)	**CLASS DISCOVERY DEADLINE**
	)	

I. INTRODUCTION

Several months ago, this Court noted that Defendants were asking the Court to restore order to these proceedings, and this Court obliged by setting a date certain for completion of class discovery. Plaintiffs' instant Motion, along with the Motion for Leave to amend the Complaint **again**, demonstrates the lengths Plaintiffs' counsel will go in order to sabotage any efforts to adjudicate this matter in an efficient manner. Plaintiffs' Motion must be denied.

The only discovery deadline at issue on Plaintiffs' Motion relates to discovery **on the issue of class certification,** which this Court reasonably ordered completed by November 1, 2018**.** (*See* Decision of July 24, 2018; hereafter "July 24th Order"). Plaintiffs' description of the status of class discovery vis-à-vis is false. All discovery from KNR related to class certification is completed,[1] or scheduled to be completed, prior to the existing November 1, 2018, deadline. Plaintiffs are in possession of Defendants supplemental discovery responses consistent with the July 24th Order, and all requested depositions of KNR employees are set to be completed prior to the current deadline. (*See* Ex. A, email exchange of September 19, 2018).

The July 24th Order conveys the Court's intention that class discovery be completed before the parties are forced to expend resources to seek discovery from the potentially dozens

[1] Contrary to Plaintiffs' claim of delay in receiving paper discovery, Defendants began providing supplemental responses 34 days after the Court's July 24th Order. All supplemental responses were in Plaintiffs' possession before the instant Motion was filed.

of individuals who may have information related to the merits of Plaintiffs' allegations. As it relates to the eleven (11) additional witnesses Plaintiffs now seek relief to depose, Plaintiffs' Motion fails to show cause why these witnesses must be deposed **prior to briefing class certification.** Plaintiffs' Motion provides no explanation of any information these individuals may have that could possibly be relevant to **the elements necessary to establish class certification** under Civ.R. 23. Even if these additional witnesses had information relevant to class certification, Plaintiffs' counsel has been aware of the identity of these witnesses for an extended period of time and either chose not to schedule their depositions until now, or otherwise failed to secure their testimony in a reasonable amount of time.

The Motion for Leave to file a fourth amendment to the Complaint and the instant Motion are transparent attempts to cause undue delay in reaching the issue of class certification. Any further delay to pursue discovery unrelated to class certification is highly prejudicial to Defendants, who have been actively pursuing adjudication of the class allegations since 2017. There is no just cause for an extension of time or delaying this case any further. Defendants remain steadfast in seeking to maintain the order restored to these proceedings by the Court's July 24th Order.

II. Law and Argument

A. Standard For Considering a Motion for Extension of Time

A trial court maintains broad discretion in regulating the discovery process. *See, e.g. Watson v. Highland Ridge Water & Sewer Ass'n*, 4th Dist. Washington No. 12CA12, 2013-Ohio-1640, ¶ 20; *Slusher v. Ohio Valley Propane Servs.*, 177 Ohio App.3d 852, 2008-Ohio-41, 896 N.E.2d 715, ¶ 33 (4th Dist.). Extensions of time are governed by Ohio Civ.R. 6(B), and trial court's decision to grant or deny a motion for an extension of time will not be disturbed on appeal absent an abuse of discretion. *See State ex rel. Mender v. Village of Chauncey*, 4th Dist. Athens No. 14CA27, 2015-Ohio-3559, ¶ 13. A trial court abuses its discretion if its

decision is unreasonable, arbitrary, or unconscionable. *See Entingh v. Old Man's Cave Chalets, Inc.*, 4th Dist. Hocking No. 08CA14, 2009-Ohio-2242, ¶ 13. "A trial court does not abuse its discretion * * * where the party seeking the continuance did not sustain [its] burden of demonstrating that a continuance was warranted for further discovery." *TPI Asset Mgmt., L.L.C. v. Baxter*, 5th Dist. Knox No. 2011CA000007, 2011-Ohio-5584, ¶ 18 (quotations omitted.)

Here, the deadline at issue applies solely to discovery **on the issue of class certification.** Thus, in filing the instant Motion, Plaintiffs bear the burden to demonstrate that an extension of time is warranted for further discovery **on the issue of class certification.** The Supreme Court of Ohio has defined the prerequisites to class certification contained in Ohio Civ.R. 23(A) and (8) as follows:

> (1) an identifiable class must exist and the definition of the class must be unambiguous;
>
> (2) the named representatives must be members of the class;
>
> (3) the class must be so numerous that joinder of all members is impractical;
>
> (4) there must be questions of law or fact common to the class;
>
> (5) the claims or defenses of the representative parties must be typical of the claims or defenses of the class;
>
> (6) the representative parties must fairly and adequately protect the interests of the class; and
>
> (7) one of the three Ohio Civ. R. 23(8) requirements must be satisfied.

In re Consol. Mortg. Satisfaction Cases, 97 Ohio St. 3d 465, 467, 2002-0hio-6720, ¶6 (2002). Ohio Civ.R. 23(8)(3) requires that "the court finds that the questions of law or fact common to class members predominate over any questions affecting only individual members, and that a class action is superior to other available methods for fairly and efficiently adjudicating the controversy." Ohio Civ.R. 23(8)(3).

Plaintiffs cannot claim they are unaware of the information they must obtain to prove the elements for class certification. Defendants described in detail the reasons these claims can never be certified as class actions in Defendants' Motion to Strike Allegations in Plaintiffs' Third Amended Corrected Complaint, which was filed 10 months ago, and denied as premature. The Motion to Strike is a road map Plaintiffs should have used to efficiently identify the evidence necessary to support their specious contention that these claims could be adjudicated as a class. Plaintiffs' failure to do so does not warrant an extension of time.

As noted above and described in detail herein: (1) there is no dispute that the class discovery Plaintiffs seek from Defendants will be completed prior to the November 1, 2018, deadline; and (2) Plaintiffs' Motion is devoid of any evidence or argument that the additional discovery sought will adduce information remotely relevant to any of the elements necessary to achieve class certification pursuant to Ohio Civ.R. 23. Moreover, Plaintiffs have had ample opportunity to obtain affidavits or depose any additional witnesses in the over two years this case has languished on the docket.

B. Class Discovery of KNR Defendants Will Be Complete Prior to November 1, 2018.

Defendants served supplemental discovery responses consistent with the Court's Order to do so beginning on August 27, 2018, with additional supplemental responses served on August 30, September 4, and September 17, 2018. Notices of Service appear on the docket. Plaintiffs requested the depositions of three (3) KNR employees prior to the November 1, 2018, deadline; Brandy Gobrogge, Rob Nestico, and Robert Redick. Dates are established for the depositions of Ms. Gobrogge and Mr. Nestico on October 16 and October 29, 2018, respectively. (*See* Ex. A). Defendants have offered the deposition of Mr. Redick for October 22 or 23, and Plaintiffs' counsel is admittedly available to depose the witness. (*Id. See also* Ex. 4 to Plaintiffs' Motion). Thus, it is undisputed that class discovery from KNR will be completed

prior to the deadline, and Plaintiffs have failed to show cause why they require additional time for class discovery from KNR. This is particularly given the stipulations that Defendants offered almost a year ago. (*See* Ex. B, Proposed Stipulations, December 20, 2017).

As a final note on Plaintiffs' discovery from KNR, Plaintiffs' counsel is not the arbiter of the order that all depositions will be taken in this case. Ohio Civ. R. 26(D) states:

> **Sequence and timing of discovery.** Unless the court upon motion, for the convenience of parties and witnesses and in the interests of justice, orders otherwise, methods of discovery may be used in any sequence and the fact that a party is conducting discovery, whether by deposition or otherwise, shall not operate to delay any other party's discovery.

There is no order in this case dictating the sequence of depositions. After two years of failing to seek such an order by filing a motion pursuant to Civ. R. 26(D), Plaintiffs should not now be heard to complain that Plaintiffs' desired sequence of depositions justifies an additional three months of discovery.[2] Counsel's stated desire to "ask witnesses about the answers of other witnesses" rings hollow because it lacks even an iota of specificity justifying an order to regiment the sequence of depositions in this case at the expense of yet more time. This is particularly true considering the limited factual issues necessary to address class certification.

Plaintiffs will have completed class discovery on the Defendants on or before November 1, 2018, and no compelling reason exists to **prevent** that from happening by ordering specifically sequenced discovery depositions.

C. Plaintiffs' Motion Failed to Establish Additional Witnesses Possess Information Relevant to Class Certification.

Approximately three weeks ago, Plaintiffs informed Defendants for the first time that they intended to take ten (10) depositions of non-parties prior to November 1, 2018. No dates were proposed, and only one (1) subpoena has been issued to these proposed deponents – a private

[2] Plaintiffs' counsel did not express his desire to depose Mr. Nestico before any other witnesses until a few weeks ago. In any event, Mr. Nestico would not be the first witness deposed because Plaintiff has already deposed Ethan Whitaker first.

investigator who works as an independent contractor for KNR. (*See* Notice of Service recorded on the docket September 14, 2018). Plaintiffs' fail to argue, much less demonstrate, that the testimony of any specific witness is likely to adduce evidence in support of the elements necessary for class certification. The witnesses are identified with brief summaries of Plaintiffs' expectations of their testimony at pp.5-6 of the instant Motion. **None of the summaries make reference to any elements necessary for class certification under Civ. R. 23.**

It is important to note that Defendants are not taking a position that these individuals could never be called upon to provide deposition testimony in this case. Defendants point is that these depositions will be completely unnecessary if and when class certification is denied. A defendant should not be forced to expend the resources necessary for preparation and taking of depositions to fish for evidence to prove the merits of the factual allegations of a class that will never be certified. It is an abuse of our system of justice to put the proverbial cart before the horse when so much time and money has the real potential for waste. It amounts to litigation for the sake of litigation.

Nor should Plaintiffs be permitted to claim their failure to properly support their Motion was a mere oversight, and attempt to correct it on Reply. Defendants cannot be required to respond to arguments that were never made in the first instance. Any fabrication of a class related justification for these depositions *ips post facto* would be mere afterthought by Plaintiffs' counsel. The reason Plaintiffs' counsel wants to take these depositions is set forth in his brief, and those stated reasons have **nothing** to do with discovery of information necessary to prove an element of class certification.

D. Plaintiffs Have Been Dilatory Seeking The Testimony of Defendant Dr. Floros and Non-Party Witnesses, and Failed to Disclose Some of The Witnesses in Discovery Responses.

Plaintiffs seek additional time to depose eleven (11) witnesses prior to moving for class certification. The fact that these witnesses have not been deposed to date is because Plaintiffs have not sought to depose most of them until now, despite knowing the identity of the witnesses from the outset. Plaintiffs simply neglected to serve a few witnesses, and tried and failed to serve others. The real story behind each witness is set forth below:

1. Minas Floros — Dr. Floros is a party. To date, Plaintiffs have not asked for availability of counsel to attend his deposition, nor have they served a notice for his deposition. Plaintiffs have known his identity from the outset, and there is no reason they could not have arranged for his deposition prior to now. As it relates to KNR, there is no dispute that Dr. Floros is paid for preparing narrative medical reports. Again, Defendants offered to stipulate to this fact, only to be rejected by Plaintiffs' counsel. Regardless, Plaintiffs provide no reason why they cannot depose him before November 1, 2018.

2. Aaron Czetli — Plaintiffs allege only that Mr. Czetli is a "Primary investigator to whom the "investigation fee" was paid from KNR client-settlements." Mr. Czetli is the principal of AMC Investigations, and his identity has been known to Plaintiffs since the outset of this case more than two years ago, as AMC is referenced in the initial complaint. There is no dispute that AMC is paid $50 by KNR for each case assigned to it, and that the fee is deducted from the settlement proceeds as an expense to the client. Defendants have offered stipulations with regard to the fee which have all been rejected by Plaintiffs. This Court ordered Mr. Czetli's deposition to be completed by September 22, 2018. (*See* Order Compelling Discovery from Investigators, July 24, 2018). Plaintiffs failed to comply with this Court's order without explanation. The time to depose Mr. Czetli on the issue of class certification has elapsed and there is no cause shown to allow for more time.

3. Michael Simpson[3] — Defendants do not contest that Mr. Simpson is the principal of MRS Investigations, that MRS is paid $50 by KNR for each case assigned to it, and that the fee is deducted from the settlement proceeds as an expense to the client. Defendants have offered stipulations with regard to the fee which have all been rejected by Plaintiffs. On September 14, 2018, Plaintiffs have issued a subpoena for his deposition to be taken October 19, 2018. Plaintiffs have been aware of the identity of Mr. Simpson since the outset of this case, as MRS is identified in the initial Complaint filed more than two years ago. Based upon the length of time that has elapsed (over two years) and the fact that a subpoena has been issued for this deposition, these is no justification for extending discovery on class certification due to Mr. Simpson's forthcoming testimony.

4. Robert Horton — Mr. Horton is the former KNR attorney who stole documents from KNR and gave them to Plaintiffs' counsel prior to filing of this lawsuit. Early in this case, Plaintiffs' counsel dramatically described Mr. Horton as a "whistleblower" and his "star witness." Mr. Horton executed an affidavit regarding his knowledge of the claims at issue, which was filed with Court on October 16, 2017. In the affidavit, Horton states he is not a whistleblower and otherwise refutes the allegations in the Complaint. Almost one (1) year later and more than two years after filing suit based upon the documents Mr. Horton stole, Plaintiffs have neglected to issue a subpoena for his deposition. There is no justification for the delay warranting an extension of time to depose Plaintiffs' own "star witness."

5. Gary Petti — Mr. Petti is a disgruntled former employee who has surreptitiously been providing information to Plaintiffs' counsel from the outset of this litigation. Mr. Petti executed an affidavit at the behest of Plaintiffs' counsel which was filed with the Court on May 5, 2017, as Exhibit F to Plaintiffs Motion to Lift the Gag Order; more than 16 months ago. Plaintiffs served Mr. Petti with subpoena for documents which was filed with the Court on February 12,

[3] The Court has allowed already four (4) other investigators to be deposed, and Mr. Pattakos is attempting to now add another.

2018, more than seven months ago. Plaintiffs provide no explanation why a deposition of this witness is necessary prior to class certification, and it is apparent they already have an affidavit from him should they choose to utilize it. There is no justification to extend discovery to allow for the deposition of this witness. To the extent he has not been deposed to date, it is due exclusively to intentional delay by Plaintiffs' counsel.

6. Paul Steele — Mr. Steele is another former employee of KNR. Plaintiffs identified Mr. Steele as a potential witness in discovery responses dated October 24, 2017. Plaintiffs have nevertheless neglected to issue a subpoena for the deposition of this witness in the one (1) year since that time, nor have they sought to obtain his affidavit. To the extent he has not been deposed to date, it is due exclusively to intentional delay by Plaintiffs' counsel. There is no cause shown to extend the discovery deadline to depose this witness prior to class certification.

7. Amanda Lantz — Ms. Lantz is another disgruntled former KNR attorney. Plaintiffs have failed to identify Ms. Lantz as potential witness in discovery responses, and are only claiming a need to depose her now. However, Plaintiffs have been aware of the identity of Ms. Lantz, as she is referenced in Plaintiffs' production of the stolen Horton documents. (*See* Williams 0050 and 0136). Plaintiffs have neglected to issue a subpoena for the deposition of this witness despite knowledge of her identity from the outset, nor have they sought to obtain her affidavit. To the extent she has not been deposed to date, it is due exclusively to intentional delay by Plaintiffs' counsel. There is no cause shown to extend the discovery deadline to depose this witness prior to class certification.

8. James E. Fonner — Dr. Fonner is a chiropractor in Columbus, Ohio. Plaintiffs note that KNR filed suit against Fonner several years ago, although they do not accurately

describe the reason for the suit.[4] Plaintiffs failed to identify Fonner as a person with knowledge in any discovery responses. However, they have known the identity of the witness as they sought discovery from KNR related to the lawsuit long ago. Plaintiffs have not issued a subpoena to take this witnesses deposition, and only claim a need to do so now in an effort to delay class certification. Plaintiffs do not explain how this witness could possibly have any knowledge relevant to certification of any class. To the extent he has not been deposed to date, it is due exclusively to intentional delay by Plaintiffs' counsel. There is no cause shown to extend the discovery deadline to depose this witness prior to class certification.

9. Philip Tassi — Dr. Tassi has nothing to do with this case. Typical of Plaintiffs' counsel's pattern of reckless misrepresentations, Plaintiffs' counsel falsely alleges that Dr. Tassi treated Monique Norris[5] and authored a report for which Norris was charged upon settlement of her case. **Dr. Tassi did not treat Norris**, nor was he paid for a report in Norris's case. (*See* Ex. C, Norris Settlement Memorandum, attached to Plaintiffs' Motion for Leave to File Fourth Amended Complaint). Plaintiffs' counsel makes the outrageous and defamatory allegation (without evidentiary support) that Tassi, Defendant Floros, and Defendant Nestico "received cash kickbacks from putative Defendant Dr. Sam Ghoubrial," exposing himself to potential Rule 11 sanctions. Plaintiffs have never identified Tassi as person with knowledge of the claims in this case in written discovery responses. However, based upon the assertions in Plaintiffs Motion for Leave to File Fourth Amended Complaint, Plaintiffs have apparently known his identity for at least ten months. If Tassi had information relevant to certification of the class claims in this case, he should have been identified as a witness long ago. To the extent he has not been deposed to date, it is due exclusively to intentional delay by Plaintiffs' counsel. There is no cause shown to extend the discovery deadline to depose this witness prior to class certification.

[4] KNR sued Fonner for tortious interference of contract.
[5] Norris is also seeking to be named an "additional" class representative for the three classes alleged in this case.

10. Ciro Cerrato — Mr. Cerrato owned and operated Liberty Capital, a loan company utilized by some KNR clients. Plaintiffs recklessly alleged that Defendant Nestico owned an interest in Liberty Capital so as to profit on referrals of KNR clients. The allegations were almost immediately demonstrated to be false. (*See* Motion for Leave to File Motion for Summary Judgment, and accompanying affidavits of Jenna Wiley and Alberto Nestico, filed November 3, 2017). Plaintiffs asked for more time to depose Cerrato, and Defendants were not permitted to file the summary judgment motion. In January of 2018, the Court allotted Plaintiffs 60 days to depose Mr. Cerrato, and they failed to do so. Defendants filed the Motion for Summary Judgment on Plaintiff Matthew Johnson's Individual Claims, and accompanying exhibits, on March 13, 2018, which Plaintiffs yet again opposed asking for more time to depose Mr. Cerrato. The Court **again** extended the deadline until the close of discovery. It cannot be possible that Plaintiffs have not had enough time to take this deposition. There is no justification to extend discovery deadlines *ad infinitum*. Plaintiffs had more than ample time to complete this deposition.

11. Robert Roby — Mr. Roby is allegedly an attorney in Columbus, Ohio, who Plaintiffs intend to depose to seek hearsay evidence "insurance companies' responses" to KNR's practices that were "knowingly disregarded by KNR." By Plaintiffs' own description, the witness is merely a "mudslinger" with no factual information to assist in establishing the elements of class certification. Moreover, Plaintiffs have failed to identify Mr. Roby as a witness until now. He is not listed as a potential witness in any discovery responses verified by Plaintiffs. Plaintiffs have not issued a subpoena for this witness at any time, nor have they sought to obtain his affidavit. Plaintiffs' brief offers no explanation as to why this witness could not have been deposed prior to the filing of Plaintiffs' Motion. Plaintiffs have again failed to show cause why **class discovery** should be extended for purposes of obtaining testimony from this witness.

E. The Proposed Extension of Time Will Cause Defendants to Suffer Substantial, Unwarranted Prejudice.

Plaintiffs' counsel has leveled false allegations of wrongdoing directed at the professional integrity of Defendants which are improperly framed as "class actions," subjecting Defendants to unwarranted ridicule in the press and social media, and damaging their business and reputation.[6] Meanwhile, each of the named Plaintiffs is looking to recover less than $200 – a claim more appropriately addressed in small claims court. It is patently absurd that this case is over two years old, and Plaintiffs' counsel has not moved for class certification. Plaintiffs have sought and received approval to extend almost every single deadline that has been placed on them in this case. Defense costs in this case exceed $500,000, to date.[7] The discovery process in a case of this nature should not cost a defendant hundreds of thousands of dollars in a case where a class can never be certified.

With just six (6) weeks until the latest deadline, Plaintiffs now claim they require three (3) additional months to depose eleven (11) additional witnesses when they have deposed **exactly one (1) witness in the past two years.** Defendants should not be forced to bear the additional time and cost of a dozen more depositions before having their day in court on the issue of class certification. Plaintiffs have no prejudice by denial of this Motion because all of the class discovery necessary to brief class certification will be done by November 1, 2018.

III. CONCLUSION

It is apparent that Plaintiffs withheld the names of multiple potential witnesses and simply neglected to subpoena others. Plaintiffs are now springing them on the defense and this Court all at once in a "Hail Mary" to design to delay the inevitable denial of a class certification

[6] See Facebook and Twitter posts, collectively attached as Ex. D. Comments from the public include: "Wow…what a horrible thing to do to people, Appalling"; "I guess we can see who really has the accidents victims back!"; "Glad you are onto this kind of fraud"; "A bunch of LOW LIFE THIEVES"; "Sounds like the law firm that Johnny Carson always referred to, Dewey, Cheatam and Howe"; "Good to see the scam many of these lawyers run being exposed".

[7] Which include costs to defend attempted recusal of judges, smear campaigns, and media attacks by Mr. Pattakos.

motion. The Motion must be denied due to Plaintiffs' failure to show cause and the prejudice to Defendants. There is no dispute that the class discovery Plaintiffs seek from Defendants will be completed prior to the existing November 1, 2018, deadline. Plaintiffs did not identify how the requested delay is related to obtaining information necessary for resolution of class certification pursuant to Ohio Civ.R. 23. Most importantly, Plaintiffs have had **ample opportunity** to obtain affidavits, depose witnesses, and otherwise prepare to move for class certification.

Defendants respectfully request the Court DENY Plaintiffs Motion for a Status Conference and Extension of Class Discovery Deadline; and, **to set a deadline** for Plaintiffs to file a motion to certify the alleged classes.

Respectfully submitted,

/s/ James M. Popson

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

CERTIFICATE OF SERVICE

Pursuant to Civ.R. 5(B)(2)(f), the undersigned certifies that a copy of the foregoing *DEFENDANTS' BRIEF IN OPPOSITION TO PLAINTIFFS' MOTION FOR FOR A STATUS CONFERENCE AND EXTENSION OF THE CLASS DISCOVERY DEADLINE* was filed electronically with the Court on this 21st day of September, 2018. The parties, through counsel, may access this document through the Court's electronic docket system.

/s/ James M. Popson
James M. Popson (0072773)

EXHIBIT A

From: Peter Pattakos [mailto:peter@pattakoslaw.com]
Sent: Wednesday, September 19, 2018 10:53 AM
To: James M. Popson
Cc: Joshua Cohen (jcohen@crklaw.com); shaunkedir@kedirlaw.com; Mannion, Tom (Tom.Mannion@lewisbrisbois.com); Dmb@dmbestlaw.com
Subject: Re: Deposition dates for KNR employees

Jim,

This is to confirm that we'll proceed with Ms. Gobrogge's deposition on October 16, and Mr. Nestico's on October 29. Please keep the other dates listed below open for additional depositions of witnesses identified in my previous correspondence, subject to their availability.

Thank you.

Peter Pattakos
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On Tue, Sep 18, 2018 at 9:40 AM, James M. Popson <jpopson@sutter-law.com> wrote:

Peter,

We have the following dates available:

Brandy Grobrogge : October 15 or 16

Robert Redick: October 22 or 23

Rob Nestico: October 29, 30, or 31.

Jim

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EXHIBIT B

SUTTER O'CONNELL ATTORNEYS

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December 20, 2017

VIA E-MAIL

Peter Pattakos
peter@pattakoslaw.com
The Pattakos Law Firm, LLC
101 Ghent Road
Fairlawn, Ohio 44333

Re: Member Williams v. Kisling, Nestico and Redick, LLC, et al.
Summit County, Court of Common Pleas Case No. CV-2016-09-3928
Our File No. 10852-00001

Dear Peter:

We are in receipt of Dean Williams' December 8, 2017 letter that we did not receive until after business on that Friday. This letter will address the flawed arguments in Mr. Williams' letter.

Improper objections as to burden and proportionality

Defendants reiterate its position that it will not review and search over 104,500 hits as part of your fishing expedition. The fishing expedition is confirmed by Plaintiffs' failure to provide actual facts to support their claims in response to Defendants' interrogatories, requests for admission, and document requests. The lack of actual facts confirms that Plaintiffs have no case. In addition, this request is extremely unduly burdensome to review documents relating to over 104,500 hits considering the lack of supporting facts for your case. As outlined in my November 15, 2017, we proposed a suitable compromise on the searches, which you have rejected out of hand and offered no other compromise. We look forward to your agreement on our compromise, or receiving an alternative compromise from you that limits the search and resulting hits and documents.

Furthermore, this amount of discovery is not proportional to the needs of the case, considering the revised stipulations to which Defendants are willing to enter into as outlined below. As the trial court in *Stonehenge Land Co. v. Bod. of Educ.*, 2014 Ohio Misc. LEXIS 10895, *8 (Franklin Cty. Common Pleas) states: "At some point a line must be drawn when discovery requests become disproportionate to the issues in the case and an end in-and-of themselves." This is especially true when, as set forth in the Motion to Strike the Class Allegations, Plaintiffs' Brief in Opposition to the Motion to Strike the Class Allegations, and in Defendants' Motion for Summary Judgment on Plaintiff Johnson's claims, Plaintiffs have no facts to support their lawsuit. For example, Plaintiff Johnson has not offered one fact that supports his claim that Defendants have an ownership and/or financial interest in Liberty

Capital. After over a year of this litigation, it is still simply innuendo. On the other hand, Defendants have offered three affidavits, all from the key players, that Defendants did not have an ownership or financial interest in Liberty Capital. This should end all discovery on Liberty Capital and Ciro Cerrato. Nevertheless, in the spirit of compromise, Defendants produced communications between Rob Nestico and Ciro Cerrato and Robert Redick and Ciro Cerrato (the only individuals who would have any information about any potential ownership or financial interest in Liberty Capital). None of documents (KNR03433-03580; KNR03581-03650) even comes close to establishing your baseless ownership and financial interest claim. The fishing expedition ends here and Plaintiff Johnson's claims should be dismissed.

Electronic searches

As Defendants agreed, they produced the responsive and non-privileged documents relating to the 95 hits for "Sign up fee" and the 71 hits for "SU fee." Out of 166 hits, Defendants produced 108 responsive documents. The other documents were either nonresponsive or were privileged documents relating to this lawsuit and were created after Plaintiffs already filed the initial Complaint.

In addition, and as agreed to, Defendants have produced documents (KNR03412-3432) based on searches for "investigation fee" for the seven individuals (Aaron Czetli, Brandy Lamtman, Rob Nestico, Robert Redick, Michael Simpson, Holly Tusko, and Jenna Wiley) previously identified in our spreadsheet. These are the critical witnesses in this case and requiring the search of the entire database is completely unnecessary and nothing but a fishing expedition. If there are additional names that you would like to add to this list (which we have previously suggested that you provide), we would in further spirit of compromise consider adding them to the search.

As for Class C (the Liberty Class), we already addressed that above. There will be no more document discovery on this class.

Defendants stand by their objections and responses regarding the following search terms:

- chiropract! AND referral!
- chiropract! AND narrative!
- "red bag!"
- ("Akron Square" or ASC or Floros) AND referral!
- ("Akron Square" or ASC or Floros) AND narrative!

As for your request to run these searches during the Rule 30(B)(5) deposition, Mr. Whitaker will explain that to run these searches takes many hours so your request for access to KNR's database to run these searches is a waste of time and unduly burdensome. However, Plaintiffs do not have these answers on the record because you chose to cancel the scheduled deposition of Mr. Whitaker.

Again, as promised, we ran searches of Rob Nestico's documents for ("Akron Square" or ASC or Floros) AND narrative! and of Robert Redick's documents for ("Akron Square" or ASC or Floros) AND narrative!. Defendants have produced the responsive documents (KNR003651-

03783; KNR03784-03830.) Again, these are the main witnesses who would have any information or documents regarding your alleged quid pro quo relationship between KNR and ASC or Dr. Floros and the narrative fee. Plus, the narrative fee is resolved by the stipulation as discussed below.

As an alternative, Defendants originally provided you with a stipulation, which you flatly rejected without providing a substitute stipulation. What is it that you want Defendants to state in the stipulation regarding the narrative fee (within reason)? Defendants will consider whether it is true and whether they can stipulate to it. However, you have chosen not to engage in good faith negotiations to resolve these discovery issues by stipulation, which you previously agreed to do.

In the stipulation, Defendants agree that KNR's policy has been to receive a narrative report from ASC on all cases, except for cases involving clients under the age of 12 and a few other minor exceptions, for $100-200. That is exactly what you are seeking in your discovery requests regarding ASC and the narrative fee. Therefore, with the documents that have been produced and the stipulation, the extensive document discovery of KNR's entire database on ASC is no longer necessary. This resolves the production of documents for Classes B (Lien Class) and D (Narrative Fee Class).

Class B is further resolved because Defendants have produced the lien letters (except for one where no lien letter was sent) of the entire putative class members of Class B (seven putative members). Per Mr. Williams' letter, Plaintiffs would agree to dismiss Class B with additional support that there are only seven putative members. The document production of the lien letters (KNR03831-03849) is that additional proof. Accordingly, please dismiss Plaintiff Wrights' claims and Class B.

Chiropractors

Defendants also stand by their objections and responses regarding the issue with discovery of all chiropractors, including the Plambeck chiropractors. You continue to completely ignore (for good reason as you have no response) the position that you are not entitled to discovery of putative class members or putative class issues (e.g., other chiropractors) without the case being certified as a class action. As you know, the case has yet to be certified. The other chiropractors are irrelevant and not part of Class B (which as discussed above should already be dismissed), as Class B is specifically limited to ASC. Per our prior discussions, because ASC is the only chiropractor listed in the class, Defendants will only respond to discovery relating to ASC.

Similarly, because Plaintiff Reid saw only Dr. Floros as a patient (and not any of the other chiropractors) and she only sued Dr. Floros, Defendants will not search for other chiropractors for Class D and will only answer discovery requests relating to ASC. If you can provide us with case law that you are entitled to a putative class member and putative class issue discovery before the case has been certified, then we will take that under advisement and possibly reconsider our position. Until then, our position stands.

The entire Plambeck lawsuit is a red herring and another fishing expedition. In addition, the discovery related to the Plambeck lawsuit seeks irrelevant information that is not reasonably

calculated to lead to the discovery of admissible evidence. Nevertheless in another spirit of compromise, we responded to the discovery regarding Plambeck in the last set of Plaintiffs' discovery requests. Those responses were provided on December 15, 2017. This should resolve the Plambeck issue.

Email chains

All documents relating to the "email chains" that Defendants have been able to discover have been produced.

Training manual

Regarding the training manuals, Defendants stand by their production. Those are the relevant documents from the manuals relating to the relevant issues in this case. Again, Plaintiffs are just fishing by wanting to know everything in the training manuals, including "how Defendants trained their employees, including which subjects were and were not covered or emphasized in KNR's training, as well as instances where Defendants' conduct may be contradicted by the manual." How Defendants trained their employees on certain issues (e.g., when someone calls and their attorney/paralegal is no longer with the firm, logging mail, etc.) and what topics they are trained on that are unrelated to this case are utterly irrelevant. Defendants will not produce these unnecessary documents.

Furthermore, it is a legitimate concern that a newly started plaintiff's firm that directly competes with one of the most successful plaintiff firms, KNR, wants all of KNR's training manuals. The protective order is not sufficient to protect KNR's interest on this issue, and neither is your word.

"Investigations" and "Investigators"

The issue of the "daily intake emails" is resolved by the revised stipulation. Defendants admit that since 2009 KNR has paid the investigator a flat fee (e.g., $30-$100) upfront on the majority of individual cases, that most of the clients were charged (as long as there was a recovery) the flat fee, which was clearly set forth on the Settlement Memorandum, and that there were no upcharge or surcharge on that flat fee. The stipulation has been revised to outline the investigation work generally done and the estimated number of settlements/resolutions (40,000-45,000). Defendants are not hiding these facts, as Defendants have stated the same facts in their discovery responses. Amazingly, you have provided no facts to contradict them. In addition, you can ask Rob Nestico, Robert Redick, Aaron Czetli, Mike Simpson, and the other two investigators (assuming you can work out your issues with counsel for the investigators) that you subpoenaed in their depositions what investigative work they do and what other work they do. What additional and relevant information do you think the "daily intake emails" will provide? If you can provide us this information, then we can possibly resolve this issue. You insisting on them with no justification is not sufficient for their production. The bottom line is that the stipulations and depositions should answer all your questions regarding "investigations" and "investigators."

Again, Plaintiffs are not entitled to the investigative work done on the other Plaintiffs because they are merely putative class members for Class A. The case has yet to be certified.

The same is true for all settlement memoranda. We provided you with exemplars of the settlement memoranda as a compromise and to show that the settlement memoranda clearly identify the investigation fee. Again, you can ask questions about the settlement memoranda in depositions.

You have already subpoenaed four investigators. There is no need to subpoena and depose all of them. Defendants' proposal is to proceed with these four and see if there is truly a need for the remaining investigators. Issuing subpoenas for all the investigators is just another example of your fishing expedition and a waste of everyone's time. It is also unduly expensive.

Stipulation of certain facts

As discussed above, and as seen in the attached amended stipulation, Defendants have revised the stipulation to address the issues that you raised in the December 8, 2017 letter. The stipulation has been revised to outline the investigation work and the estimated number of settlements/resolutions (40,000-45,000). In addition, the stipulation includes a paragraph on the non-client related "work" that the investigators do. Again, you can ask additional questions on these issues during their depositions. Please feel free to make suggestions to the stipulation and we will consider them. We are willing to work with you on the stipulation.

Other outstanding issues

Interrogatory No. 17: Defendants stand by their objections that this is privileged information (Defendants cannot just provide their clients' names to whomever) and you are not entitled to this information until the case has been certified.

RFP 3-64, 3-65, 3-66 and Interrogatory 2-29: These discovery requests are absolutely nonsense. There is no legitimate need for documents or information relating to the "Attorney At Law" article. The requests seek irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. This is further evidence of your fishing expedition and unwillingness to compromise on discovery, including this trivial issue. Defendants stand by their objections.

RFP 3-26: Please see Defendants' response on chiropractors.

Robert Horton and Gary Petti's employment files: As for the employment files for Rob Horton and Gary Petti, Defendants stand by their objection that they cannot produce these files without Horton and Petti's written permission. Per our discussion at the meeting and my November 15, 2017 letter, you can easily obtain their written permission (especially since Gary Petti is your witness and you have had communications with Rob Horton's counsel), which will eliminate this issue. You are creating a mountain out of a mole hill when you can easily resolve this situation. You would not produce a former employee's employment file in litigation without written consent and neither will Defendants. This is clearly an example of your failure to engage in any form of compromise to resolve the discovery issues.

Issues with Requests for Admissions: Defendants are allowed to qualify their answers to Plaintiffs' Requests for Admissions as they see fit, especially poorly drafted Requests for Admission. It is not Defendants job to tell Plaintiffs how to properly draft intelligible Requests

for Admission. This seems to be habit of yours that you want Defendants to always correct your mistakes; that is not Defendants' job. We will not engage in further discussions on this issue.

"Subject to and without waving these objections": Now you are just making up arguments for the sake of having an argument. The "subject to and without waiving these objections" language (or similar language) is standard language used by every attorney that I have seen in answering discovery requests where they assert an objection. In fact, you did the same in your discovery responses. The language means exactly what it says: Defendants are answering the discovery request subject to and without waiving the objections. There is no need for further clarification. We will not engage in further discussions on this issue.

Plaintiffs' discovery issues

As for your failure to "simultaneously" produce discovery, Defendants are again demanding production of Plaintiffs' documents. There is no further excuse for not producing the documents, as Defendants have produced over 3,800 pages of documents. In addition, Defendants request dates for the depositions of Plaintiffs Williams, Wright, and Reid. Furthermore, Defendants demand that Plaintiffs provide the executed verification for Plaintiffs' interrogatory responses. After having discussions with your client regarding your request to recuse Judge Cosgrove, you should have been able to obtain the verification pages. We will not accept your word on the verification pages and the veracity of the responses.

Finally, we look forward to you signing the stipulation or providing us with revisions to the stipulation that we may consider. In the interim, Please contact me with any questions or comment.

Sincerely,

Sutter O'Connell

Brian E. Roof

BER/ma
Enclosure
cc: James M. Popson
Eric Kennedy
Tom Mannion
John F. Hill

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, *et al.*, Plaintiffs, vs. KISLING, NESTICO & REDICK, LLC, *et al.*, Defendants.	Case No. 2016-CV-09-3928 Judge Patricia Cosgrove

THE PARTIES' JOINT STIPULATION ON CERTAIN FACTS

Based on negotiations among counsel for Plaintiffs Member Williams, Naomi Wright, Matthew Johnson, and Thera Reid (collectively "Plaintiffs") and counsel for Defendants Kisling, Nestico & Redick LLC ("KNR"), Alberto Nestico, and Robert Redick (collectively "KNR Defendants"), and counsel for Minas Floros, D.C. as well as the parties discovery requests and responses, the parties have agreed to the following factual stipulations only:

1. Since 2009 to the date of this filing, KNR has paid investigators a flat fee (ranging from $30-$100 depending on the time period and the investigator) upfront on the vast majority of cases and that most of the clients were charged (as long as there was a recovery) the flat fee. As set forth in Defendants' discovery responses, for that flat fee, the investigators provide other services, including, without limitation: pick up police reports, addendums and photos; take accident scene photos; take or obtain property damage photos at body shops; take or obtain photos of client injuries; obtain medical records and bills; obtain regular and/or certified copies from courts and

agencies; locate witnesses and obtained statements; deliver and obtain execution of documents including but not limited to medical authorizations, IRS authorizations, powers of attorney, and settlement agreements and releases after the client's consultation with his attorney; pick up and drop off settlement checks; perform "door knocks" at the suspected residence of clients who have failed to respond to KNR's attempts to contact them by phone, email and/or mail; serve 180-day letters and subpoenas; file pleadings and briefs as needed; and perform other litigation-related investigations.

2. As set forth in Defendants' discovery responses, Aaron Czetli and Michael Simpson, as independent contractors, have previously performed other work (such as stuffing envelopes and running errands) for KNR that were unrelated to a specific client and was not charged to a specific client. They performed this work when they were not acting as investigators on behalf of KNR's clients.
3. KNR pays and paid that investigation fee to the investigator whether or not KNR obtained a recovery on behalf of the client.
4. The flat fee is and was clearly set forth on the Settlement Memorandum issued to, reviewed by, and signed by each client.
5. There were, and are, no upcharge or surcharge on the investigation fee by KNR. The investigation fee was and is a third-party pass through expense.
6. Since 2009, KNR has settled between 40,000 to 45,000 cases in which investigators were used and the investigation fee was charged.

7. KNR's policy has been to receive a narrative report from ASC on all cases, except for cases involving clients under the age of 12 and a few other minor exceptions, for $100-200.
8. AMC and MRS have not and do not receive W-2, W-9, or 1099 forms from KNR. Rather, AMC and MRS receive an individual check for the case they are assigned. AMC and MRS are paid $35-50 per case for their investigative work.

This stipulation is not valid or enforceable unless all parties have signed the document. Unless otherwise entered into in writing by the parties and signed by the parties, there are no other stipulations regarding the facts of this case.

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Daniel Frech (0082737)
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Fairlawn, Ohio 44333
(330) 836-8533 phone
(330) 836-8536 facsimile
peter@pattakoslaw.com
dfrech@pattakoslaw.com

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broof@sutter-law.com

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

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Meleah M. Kinlow
Buckingham, Doolittle & Burroughs, LLC
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Akron, OH 44333-8332

(330) 376-5300 phone
(330) 258-6559 facsimile
jhill@bdblaw.com
mkinlow@bdblaw.com

Counsel for Minas Floros

EXHIBIT C

232154 / Monique Norris

Settlement Memorandum

Recovery:

REC	Motorists Mutual Insurance Company	$ 250.00
MP	Motorists Insurance Group	$ 1,000.00
REC	Nationwide Insurance*	$ 4,982.55
REC	Liberty Capital Funding LLC	$ 500.00
		$ 6,732.55

DEDUCT AND RETAIN TO PAY:

Kisling, Nestico & Redick, LLC		
Akron General Medical Center	$ 6.00	
Clearwater Billing Services, LLC	$ 50.00	
First Healthcare	$ 12.00	
Floros, Dr. Minas	$ 200.00	
Mercy Health Partners	$ 15.00	
MRS Investigations, Inc.	$ 50.00	
Professional Receivables Control, Inc.	$ 16.00	
Akron General Medical Center	$ 40.89	
Total Due	$ 389.89	

DEDUCT AND RETAIN TO PAY TO OTHERS:

Akron Square Chiropractic	$ 500.00	
Clearwater Billing Services, LLC	$ 600.00	
CNS Center for Neuro and Spine	$ 260.00	
Kisling, Nestico & Redick, LLC	($2,077.51) $ 1,750.00	
Liberty Capital Funding LLC	$ 800.00	
National Diagnostic Imaging Consultants	$ 80.00	
Ohio Tort Recovery Unit*	$ 506.75	
Total Due Others	$ 4,496.75	

Total Deductions	$ 4,886.64
Total Amount Due to Client	$ 1,845.91
Less Previously Paid to Client	$ 1,500.00
Net Amount Due to Client	$ 345.91

I hereby approve the above settlement and distribution of proceeds. I have reviewed the above information and I acknowledge that it accurately reflects all outstanding expenses associated with my injury claim. I further understand that the itemized bills listed above will be deducted and paid from the gross amount of my settlement except as otherwise indicated. Finally, I understand that any bills not listed above, including but not limited to Health Insurance or Medical Payments Subrogation and/or those initialed by me to indicate that they are not being paid from the settlement are my responsibility and not the responsibility of Kisling, Nestico & Redick, LLC.

Date: 5/25/14

Name: Monique Norris

Monique Norris

Firm:

Kisling, Nestico & Redick, LLC

EXHIBIT D

Sandra Kurt, Summit County Clerk of Courts

EXHIBIT D

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You rock, Pete! So proud of you!
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Adam Fried
September 14, 2017 at 3:16 PM
Congratulations!
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Michael J. Saltzman
September 14, 2017 at 1:11 PM
Their Phone Number says it all: (330) VENT-588 They Listen.
1 Like
Like · Comment

The Pattakos Law Firm LLC
September 15 at 12:37 PM ·

"Sam Ghoubrial charged patients that KNR referred to him $500 for a device that cost him $27.50, and the law firm negotiated into those patients' court settlements an agreement to take $500 from the patient's payout and re Ghoubrial, plaintiffs' attorney Peter Pattakos said in a request to amend the original lawsuit filed in 2016."

https://www.cleveland.com/.../lawyers_suing_knr_accuse_docto....

Anyone with information or concerns about alleged fraudulent conduct by KNR is encouraged to contact us by phone at 330.836.8533 or by email at info@pattakoslaw.com.

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Former clients suing KNR accuse doctor of over-billing
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Steve Stillwell The Pattakos Law Firm LLC was it TENS units they were overcharging for? I was prescribed one by my doctor and it cost $700 something, but it wasn't due to injury and there weren't any lawyers involved.
Like · Reply · 4d

Write a reply...

Linda Girard Joan Teitsworth A bunch of LOW LIFE THIEVES
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Rich Wilson I've always been of the opinion that these television lawyers are nothing more than "ambulance chasers". They give a bad name that respectable lawyers work hard to overcome.
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William Eadie What happened to that gag order on the current common pleas case?

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The Pattakos Law Firm LLC Judge Breaux lifted the gag order last October: https://www.pattakoslaw.com/judge-lifts-gag-order-knr.../

PATTAKOSLAW.COM
Judge lifts gag order in KNR fraud lawsuit | Pattakos Law...
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Patrick Keenan Good to see the scam many of these lawyers run being exposed....
Like · Reply · 5d

Jimmy Sizemore Sounds like the law firm that Johnny Carson always referred to, Dewey, Cheatam and Howe.
Like · Reply · 4d

Brian Orr Forgive my ignorance but isn't "fraudulent conduct" such as the alleged over-billing and kickback schemes a criminal issue? Where is the law on this?
Like · Reply · 4d

Kristina Faith Sharon Kenyon
Like · Reply · 4d

Gary Foulks Hurt in a car, call someone else.
Like · Reply · 4d

Mark Janke Hurt in a car call WKNR the sports radio station ... ?
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AmySue Taylor I will not say any lawyer or his practice is a shyster just on a lawsuit being filed BUT as a lawyer, I daily see the effects of shady and evil insurance company practices on my clients. Adjusters and their computers decide what injuries come from the ... See More
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The Pattakos Law Firm LLC
September 6 at 3:37 PM ·

If you or anyone you know has been represented by the KNR law firm (Kisling Nestico and Redick) and treated by Akron-area doctor Sam Ghoubrial, please take notice:

We have recently discovered evidence showing that Dr. Ghoubrial, to whom KNR has funneled thousands of its clients for "pain management" services, has been charging KNR clients exorbitant fees for medical devices without disclosing his financial interest in the transactions. For example, Ghoubrial has sent many KN... See More

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Jim Bills Better call Saul · 9
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Rob Corns "If you're hurt on a bus, y'all better call us!" · 4
Like · Reply · 1w

Kevin Finch Scamming ambulance chasers · 5
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Rob Devereux Hey James Miller isn't this the doc you had after your accident in the van? · 1
Like · Reply · 1w

John Arnsby

Like · Reply · 1w

Stevin Groth Steven Crossmock
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Steven Crossmock #confidentialityagreement · 1
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William Elder I think there is a board that oversees lawyers and doctors for practices
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Mike Kennedy Yea right. The boards are fellow lawyers and doctors!!! · 1
Like · Reply · 1w

William Elder Mike Kennedy agree the post is one law firm against another law firm and their fellow overseers should settle it
Like · Reply · 1w

Robert Hartman Crooks watching over Crooks.
Like · Reply · 1w

Write a reply...

Steve Merkel Does the truck have a serving window for walk-ups? · 1
Like · Reply · 1w

Dave Grauel I hate scumball attorneys some good but these guys seem like they are creating a big scam with a doctor . Court needs to call knr make em pay

Like · Reply · 1w

James Jackson

Like · Reply · 1w

Bill Bammerlin Rob a driver at my work pulled out of a gastation and hit a guy at the light with his l f tire and did $1500 damage to the car, a year later the insurance co paid $48000. To him for pain and suffering. · 2
Like · Reply · 1w

Marcia Deering The fox guarding the henhouse. · 4
Like · Reply · 1w

Timothy D Snavely Yeah they r crooks
Like · Reply · 1w

Tai Marie Thank you. I hate KNR.
Like · Reply · 1w

Chris H. Vallos Wonder why insurance rates are through the roof?
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Nova Blackwell Skylar M. Jackson
Like · Reply · 1w

Ardenia Roddy I knew it was a matter of time for someone to catch up with knr they did me a dirty deal karma is a bitch
Like · Reply · 1w · 1

Michael Miller Does this mean we should all start a class action suit against hospitals that charge $17.00 for one Tylenol pill ? $300.00 for a IV of sugar water, $90,000.00 for a round of Anti-Venom that costs them $300.00 ?
Like · Reply · 1w · 6

Lin WallBonn Right😠
Like · Reply · 1w

Write a reply...

Dennis Garrett Judy Garrett
Like · Reply · 1w

Ross Ahern Nice work exposing this corruption. As you stated in other posts on this topic, KNR really hurt their clients cases by having clients go to their "preferred provider." Insurance companies aren't dumb.
Like · Reply · 5d

Write a comment...

The Pattakos Law Firm LLC
September 6 at 3:34 PM

If you or anyone you know has been represented by the KNR law firm (Kisling Nestico and Redick) and treated by Akron-area doctor Sam Ghoubrial, please take notice:

We have recently discovered evidence showing that Dr. Ghoubrial, to whom KNR has funneled thousands of its clients for "pain management" services, has been charging KNR clients exorbitant fees for medical devices without disclosing his financial interest in the transactions. For example, Ghoubrial has sent many KNR clients home with electrical-nerve-stimulation devices ("TENS units"), without advising them that they would be charged for this equipment. Later, the clients would have $500 deducted from their settlements to pay for these devices, for which, as the distributors have confirmed, Ghoubrial only paid $27.50 for and thus took a profit of more than 1,800% on each sale.

Ohio law prohibits doctors from taking secret profits from selling medical supplies to their patients, and if you were charged for a device provided by Dr. Ghoubrial, you might be entitled to recover.

Please see the below-linked post at our website for more information, including about other claims involving alleged kickbacks between KNR and a network of chiropractors, and a loan company called Liberty Capital. Anyone with information or concerns about alleged fraudulent conduct by KNR is encouraged to contact our law firm by phone at 330.836.8533 or by email at info@pattakoslaw.com.

https://www.pattakoslaw.com/knr-law-firm-clients-seek-reim…/

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The Pattakos Law Firm LLC
August 16

Republicans currently occupy all seven seats on Ohio's Supreme Court. Democrat Michael Donnelly, who is running for an open seat on the Court

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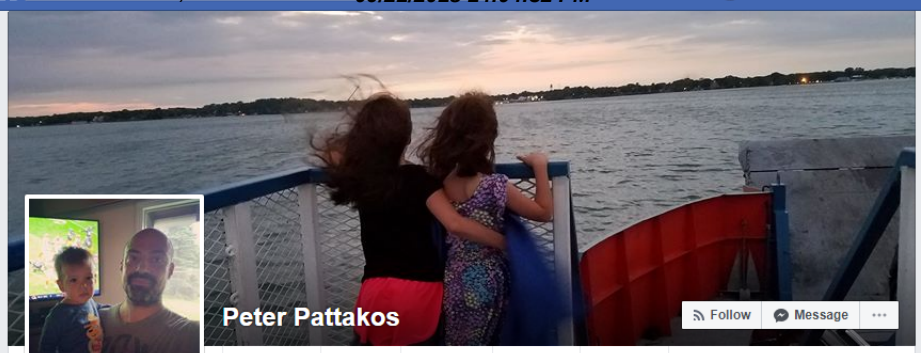
User:	sutter-aross



Peter Pattakos

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Intro

- Partner at The Pattakos Law Firm LLC
- Worked at Jones Day
- Studied at Northwestern University Pritzker School of Law
- Studied at New York University
- Went to Revere High School
- Lives in Akron, Ohio
- From Akron, Ohio
- Followed by 90 people
- Manages The Pattakos Law Firm LLC

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Peter Pattakos shared a post.
September 15 at 9:00 AM ·

Here's a Cleveland.com story about our KNR case in which Dr. Ghoubrial's lawyer claims that taking a secret 1,800% profit by charging $500 for useless TENS units that cost $27.50 is OK because "doctors and hospitals routinely charge patients and insurance companies more for items than the actual cost" and they found "another doctor's office that charged a patient $1,500 for the same device."

Whatever doctors and hospitals "routinely" do, they're bound by The Supreme Court of Ohio's holding that the "physician-patient relationship is a fiduciary one based on trust and confidence and obligating the physician to exercise good faith." As other courts have noted, "there is no other profession or business where a member thereof can dictate to a consumer what brand he must buy, what amount he must buy, and how fast he must consume it and how much he must pay with the further condition to the consumer that any failure to fully comply must be at the risk of his own health." Undisclosed self-dealing by doctors against their own patients is strictly prohibited.

We're proud of our clients for standing up against these abuses and look forward to vindicating their rights and those of all Ohio consumers of health-care services.

The Pattakos Law Firm LLC Like Page
September 15 at 8:37 AM ·

"Sam Ghoubrial charged patients that KNR referred to him $500 for a device that cost him $27.50, and the law firm negotiated into those patients' court settlements an agreement to take $500 from the patient's payout and re Ghoubrial, plaintiffs' attorney Peter Pattakos said in a request to amend the original lawsuit filed in 2016."

https://www.cleveland.com/.../lawyers_suing_knr_accuse_docto....

Anyone with information or concerns about alleged fraudulent conduct by KNR is encouraged to contact us by phone at 330.836.8533 or by email at info@pattakoslaw.com.

CLEVELAND.COM | BY CLEVELAND.COM
Former clients suing KNR accuse doctor of over-billing Learn More

11 1 Comment

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Julie Silva Palmer Keep kicking butt, Pattakos!
Like · 5d

Peter Pattakos shared a post.
September 14 at 9:01 AM ·

This is one of the best takes I've ever read on race relations in the U.S., by

Chat

Peter Pattakos Timeline Recent

Intro

- Partner at The Pattakos Law Firm LLC
- Worked at Jones Day
- Studied at Northwestern University Pritzker School of Law
- Studied at New York University
- Went to Revere High School
- Lives in Akron, Ohio
- From Akron, Ohio
- Followed by 90 people
- Manages The Pattakos Law Firm LLC

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Peter Pattakos shared a post.
September 14 at 9:01 AM

This is one of the best takes I've ever read on race relations in the U.S., by Prof. Adolph Reed of UPenn.

> **Liza Featherstone**
> September 11 at 11:01 PM
>
> "Nevertheless, we continue to indulge the politically wrong-headed, counterproductive, and even reactionary features of the "representative black voice" industry in whatever remains of our contemporary public sphere. And we never reckon with the truly disturbing presumption that any black person who can gain access to the public microphone and performs familiar rituals of "blackness" should be recognized as expressing significant racial truths and deserves our attention. This presumption rests on the unexamined premise that blacks share a common, singular mind that is at once radically unknowable to non-blacks and readily downloaded by any random individual setting up shop as a racial voice. And despite what all of our age's many heroic narratives of individualist race-first triumph may suggest to the casual viewer, that premise is the essence of racism."

THEBAFFLER.COM
The Trouble With Uplift | Adolph Reed
A curiously inflexible brand of race-first neoliberalism has taken root in American political discourse.

4

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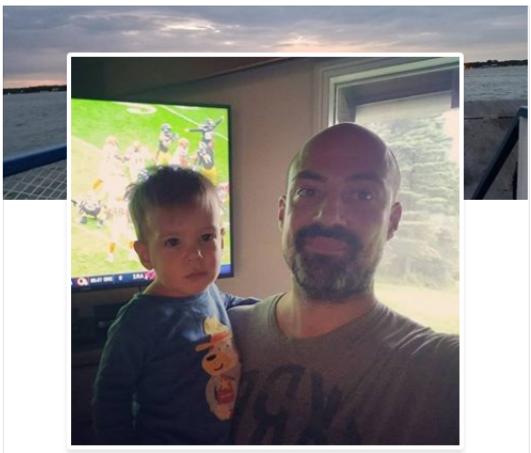
Peter Pattakos updated his profile picture.
September 10 at 9:33 AM

17 months old still waiting for a Browns win



160 9 Comments

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Paul Byron Pattak Your expressions are identical! 2
1w

Peter Pattakos My boy
1w

Erin Holston Singh Getting closer! 1
1w

Alexander Joseph He's so big 1
1w

Harrison Blythe Yeah but how many 20+ year-olds are still waiting for their teams to tie? 3
1w

Chat

Peter Pattakos Timeline Recent

Intro

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Harrison Blythe Yeah but how many 20+ year-olds are still waiting for their teams to tie?
1w

Drew Banas What a great looking youngster!!!!!!
1w

Peter Pattakos Come on now Mr. B I'm 40 now, hardly a youngster!
1w

Craig Ihms He already has the 1,000 yard stare of a Browns fan.
1w

Craig Ihms It reminds me of the mother holding her child in this image. https://deadspin.com/factory-of-sadness-gets-a-sadness...

DEADSPIN.COM
Factory Of Sadness Gets A Sadness Upgrade With...
1w

Phil Angelo Sr. Watch Ohio State, more fun, especially if you like watching one stupendous quarterback, and receivers, and running backs and line play.
1w

Michael Borden What a beauty!
1w

Patrick Adams At least they won't lose them all. 0-15-1
1w

Peter Pattakos shared a post.
September 6 at 11:42 AM ·

Big development in our fraud suit against the KNR law firm:

In sum, we have received information from former KNR clients confirming that the firm's practice is to have chiropractors cold-call car-accident victims on the firm's behalf, and send a van to pick them up to shuttle them first to the chiropractor's office, where they're presented with a high-pressure sales pitch to sign up with the firm, and then to a the office of Dr. Sam Ghoubrial for "pain management," where the... See More

The Pattakos Law Firm LLC Like Page
September 6 at 11:34 AM ·

If you or anyone you know has been represented by the KNR law firm (Kisling Nestico and Redick) and treated by Akron-area doctor Sam Ghoubrial, please take noti...

See More

PATTAKOSLAW.COM
KNR law firm clients seek reimbursement for fraudulent medical-supply sales by Akron doctor | Pattakos Law Firm...

53 11 Comments 3 Shares

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Roberta McQuown Glad you are onto this kind of fraud.
Like · 2w

Phil Payne Damn, nice work weeding this out
Like · 2w

Keith Marlowe i guess we can see who REALLY has the accidents victims back!
Like · 2w

Chat

Document title:	Tweets with replies by Peter Pattakos (@peterpattakos) | Twitter
Capture URL:	https://twitter.com/peterpattakos/with_replies
Captured site IP:	104.244.42.129
Page loaded at (UTC):	Fri, 21 Sep 2018 13:04:45 GMT
Capture timestamp (UTC):	Fri, 21 Sep 2018 13:07:41 GMT
Capture tool:	v6.8.1
Collection server IP:	54.175.14.236
Browser engine:	Chrome/62.0.3202.9
Operating system:	Microsoft Windows NT 6.2.9200.0 (6.2.9200.0)
PDF length:	7
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User:	sutter-aross

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Peter Pattakos
@peterpattakos

Ohio attorney focused on protecting civil, consumer, and employee rights (pattakoslaw.com), writer on Cleveland sports & etc. (clevelandfrowns.com)

Cleveland, Ohio
clevescene.com/cleveland/Arti...
Joined May 2009

Tweet to Peter Pattakos

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471 Photos and videos

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Peter Pattakos @peterpattakos · 14m
Replying to @wiseoldredbeard
I'm just over here enjoying the riduculousness of the victory fridges. Why be so negative about it?

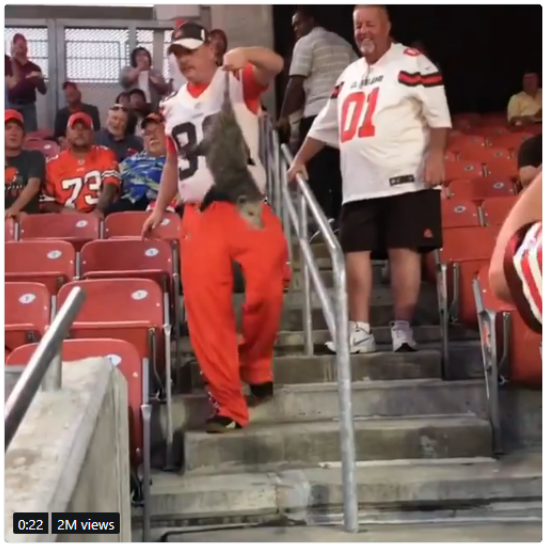
Peter Pattakos Retweeted

Pete Blackburn @PeteBlackburn · 9h

6 144 559

Peter Pattakos Retweeted

Busted Coverage @bustedcoverage · 11h
Nbd, just a Browns fan catching a possum tonight at the stadium



1.0K 11K 28K

Peter Pattakos @peterpattakos · 9h

Who to follow · Refresh · View all

Craig Lyndall @WFNYCraig — Follow

Tom Withers @twithersAP — Follow

Vince Grzegorek @vincet — Follow

Find people you know
Import your contacts from Gmail

Connect other address books

Trends for you · Change

Baker
412K Tweets

Tyrod
95.5K Tweets

#FridayFeeling
63.3K Tweets

Cleveland Browns
120K Tweets

Mister Rogers
6,443 Tweets

#GoogleDoodle
3,382 Tweets

Jarvis Landry
10.7K Tweets

Bud Light
30.2K Tweets

Carlos Hyde
13.3K Tweets

Darnold
41.7K Tweets

Peter Pattakos @peterpattakos

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Follow

1.0K 11K 28K

Peter Pattakos @peterpattakos · 9h
Replying to @dubbythe1
Haha how are the Amalfi Coast Browns backers doing tonight?
1 1

Peter Pattakos @peterpattakos · 9h
Replying to @InternetGustav
Nothing inhabits more potent energy for change than our Browns!
2

Peter Pattakos @peterpattakos · 9h
Replying to @marxandlennon
He was great! God help him!
1

Peter Pattakos Retweeted
Další Basic Boy @RichThomeQuan · 10h
Let the record show that renown, peripatetic wagering expert @peterpattakos had Browns -3 as his stone cold lock of the year
2 1 6

Peter Pattakos @peterpattakos · 9h
Replying to @wenbickert
Hahaha congrats buddy
1

Peter Pattakos @peterpattakos · 10h
Replying to @Fred_Coupon
Whatever it takes!
1

Peter Pattakos @peterpattakos · 10h
Replying to @RichThomeQuan
Just like we drew it up buddy
2

Peter Pattakos @peterpattakos · 10h
This cosmic joke of a football club barely got a win at home over the sorry rookie-quarterbacked Jets in week 3 of the regular season and we are opening victory fridges. What a time to be alive, folks.
10 1 36

Peter Pattakos Retweeted
Vince Grzegorek @vincethepolack · Sep 18
From personal experience, and Cavs beat writers past and present would back me up, journalism to Danny means PR and nothing more, so yeah, great.

> **Detroit Free Press** @freep
> Report: Dan Gilbert part of group considering buying magazines on.freep.com/2MHTudC

3 2 12

Peter Pattakos Retweeted
dsa darmok caucus @MyFriendCamilo · Sep 18
It's amazing to me the extent to which business owners feel entitled to not have their political activity examined.

If you don't want people to bring it up you are perfectly free to *not* give Jim Renacci $6,000, for example.
2 5 21

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Peter Pattakos Retweeted
The Cleveland Guy (Hudson's Dad) @TH_Da_06er · Sep 17
Josh Gordon walked into the Browns facility with a fake limp and water in a Ciroc bottle now he going to the Super Bowl. Next level scamming right there.
42 1.9K 5.6K

Peter Pattakos @peterpattakos · Sep 18
Replying to @ColinRayMLCL
Those were two great games you got us in in the playoffs. Not to make excuses but it'll always be tough for us to win when we're missing our heart and soul, @andy geronimo

Peter Pattakos @peterpattakos

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Those were two great games you got us in in the playoffs. Not to make excuses but it'll always be tough for us to win when we're missing our heart and soul, @andy_geronimo

1

Peter Pattakos @peterpattakos · Sep 18
Replying to @ColinRayMLCL
Congrats buddy

1

Peter Pattakos Retweeted

The New York Times @nytimes · Sep 11
U.S. unemployment is down and jobs are going unfilled. But America's tremendous economic growth has not led to broad social uplift. Instead, workers are being shut out of the profits they are helping to generate.

Americans Want to Believe Jobs Are the Solution to Poverty. They're ...
U.S. unemployment is down and jobs are going unfilled. But for people without much education, the real question is: Do those jobs pay enough to...
nytimes.com

150 597 988

Peter Pattakos Retweeted

Ben Tausig @datageneral · Sep 16
The Cleveland Browns are a breathtaking art project, the most advanced challenge to professional sports and indeed capitalism that we have, and should be treasured.

1 6 52

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Peter Pattakos @peterpattakos · Sep 16
Love my Cleveland Browns

1 1 12

Peter Pattakos @peterpattakos · Sep 16
The curse of Phil Dawson is real folks

1 2 29

Peter Pattakos Retweeted

Jedediah Purdy @JedediahSPurdy · Sep 16
Similarly, the Brandeis-Frankfurter-Robert Jackson line of justices, who are so clear on the political character of the Supreme Court & the basic conflict of economic vs democratic power in US law, makes today look by contrast like an age of hypocrisy, superstition, & confusion.

> **Matt Stoller** @matthewstoller
> Not just more detailed, but clearer. They didn't say "infrastructure" or "human capital," they said bridges and roads. It's not that we've become stupider, it's that we're far more elitist and our language and thinking reflects that.
> twitter.com/superwuster/st...
> Show this thread

1 13 51

Peter Pattakos Retweeted

Matt Stoller @matthewstoller · Sep 16
Not just more detailed, but clearer. They didn't say "infrastructure" or "human capital," they said bridges and roads. It's not that we've become stupider, it's that we're far more elitist and our language and thinking reflects that.

> **Tim Wu** @superwuster
> Why is it that the Presidential election speeches of, say, 1911, are written with such intelligence and attention to policy detail? Have we all just gotten stupider?

5 68 270

Peter Pattakos @peterpattakos

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Peter Pattakos @peterpattakos · Sep 16
Undisclosed self-dealing by doctors against their own patients is strictly prohibited by Ohio law.

5

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Peter Pattakos @peterpattakos · Sep 16
Note: Whatever doctors and hospitals "routinely" do, they're bound by The Supreme Court of Ohio's holding that the "physician-patient relationship is a fiduciary one based on trust and confidence and obligating the physician to exercise good faith."

1 6

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Peter Pattakos @peterpattakos · Sep 16
Cleveland.com story on our KNR case in which a defense lawyer claims that a doctor taking a secret 1,800% profit from his patients by charging $500 for useless TENS units that cost $27.50 is OK because other people do it too:

Former clients suing KNR accuse doctor of over-billing
Sam Ghoubrial charged patients that KNR referred to him $500 for a device that cost him $27.50, and the law firm negotiated into those patients' court
cleveland.com

1 3

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Peter Pattakos @peterpattakos · Sep 14
This is one of the best takes I've ever read on race relations in the U.S., by Prof. Adolph Reed of UPenn.

> **The Baffler** @thebafflermag
> "Alongside the close vetting of respectable black voices in the media mainstream there's been a prolonged atrophy of popular political mobilization behind issues of economic equity for black Americans."
> buff.ly/2Q41pEU

2

Peter Pattakos Retweeted

Bill Barnwell @billbarnwell · Sep 9
The Browns are +5 in takeaways today. Since the Browns returned to the NFL, teams with a turnover margin of +5 or better in a game are 132-4-1. The Browns are responsible for two of those losses and the tie.

408 9.9K 22K

Peter Pattakos Retweeted

Jessica Smetana @jessica_smetana · Sep 9
what a time to be alive

Peter Pattakos
@peterpattakos

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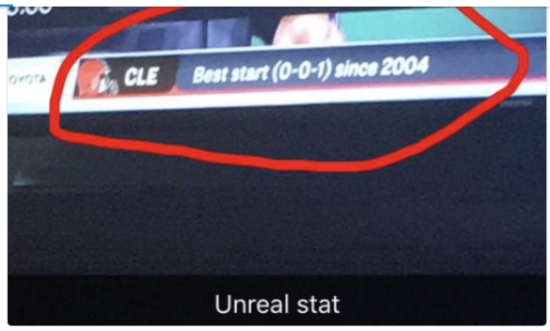

350 29K 109K

Peter Pattakos @peterpattakos · Sep 9
Replying to @proudliberal170
Yes

Peter Pattakos @peterpattakos · Sep 9
Just living our truth over here man
1

Peter Pattakos Retweeted

gabi @gabi_heard · Sep 8
my friend thought Machine Gun Kelly was the girl that walks around Kent State w an assault rifle and i'm .... deceased
565 96K 500K

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Peter Pattakos @peterpattakos · Sep 9
Replying to @NSometimesY
I'm so sorry

Peter Pattakos @peterpattakos · Sep 9
Replying to @curtiscm
Hahaha guilty as charged
1

Peter Pattakos @peterpattakos · Sep 9
Only a half game back in the AFC north folks
1 1 22

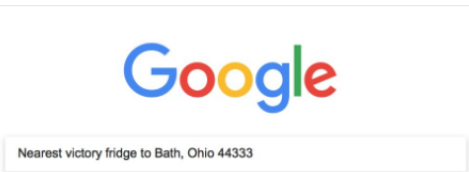
Peter Pattakos @peterpattakos · Sep 9
There's a tie fridge at my house folks DM for address
2 29

Peter Pattakos @peterpattakos · Sep 9
Replying to @marxandlennon
Yes, Bath OH 44333
2

Peter Pattakos @peterpattakos · Sep 9
There is a serious discussion going on in my house now about whether the Browns should just kneel and take the tie
3 2 23

Peter Pattakos @peterpattakos · Sep 9
Replying to @Pynchump216
Hahahaha yes
1

Peter Pattakos @peterpattakos · Sep 9



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Peter Pattakos @peterpattakos

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Nearest victory fridge to Bath, Ohio 44333

Google Search | I'm Feeling Lucky

2 12

Peter Pattakos @peterpattakos · Sep 9
Need to execute a trade and life flight Phil Dawson in immediately

1 1 8

Peter Pattakos @peterpattakos · Sep 9
MAN THE VICTORY FRIDGES

1 1 10

Peter Pattakos Retweeted

The Discourse Lover @Trillburne · Sep 8
It really is not more complicated for these people than "anything is okay when the US does it"

59 1.1K 3.7K

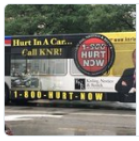
Peter Pattakos @peterpattakos · Sep 6
Replying to @pgshakelton
Thanks buddy

1

Peter Pattakos @peterpattakos · Sep 6
More information about the case is available here: cleveland.com/court-justice/...

And here: pattakoslaw.com/personal-injur...

Anyone with information or concerns about this firm and its business practices is encouraged to contact us, 330.836.8533, info@pattakoslaw.com



Personal-injury law firm KNR accused of deceiving ...
CLEVELAND, OHIO – A proposed amended complaint filed on March 22, 2017 in the Summit County Court of Common Pleas by three former clients of the Ohio pers...
pattakoslaw.com

1 1

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Peter Pattakos @peterpattakos · Sep 6
This is the same case where Defendants asked the court to impose an unconstitutional gag order on us to keep us from speaking with the public, which caused Advance Ohio Media and lawyers from CWRU to file legal action on our behalf to protect the public's right to this info

1 2

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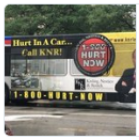
Peter Pattakos @peterpattakos · Sep 6
Big development in our fraud suit against the KNR law firm re: doctors secretly taking exorbitant profits by selling medical supplies to the firm's clients:



KNR law firm clients seek reimbursement for fraud...
Dr. Sam Ghoubrial accused of pressuring car-accident victims referred by KNR into paying exorbitant prices for medical supplies without disclosing his financial intere...
pattakoslaw.com

3 7

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