

**IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO**

MEMBER WILLIAMS, et al.,
Plaintiffs,

v.

KISLING, NESTICO & REDICK, LLC, et al.

Defendants.

Case No.: CV-2016-09-3928

Judge James Brogan

**DEFENDANTS' AMENDED NOTICE
OF VIDEOTAPED DEPOSITION
DUCES TECUM OF DEFENDANT
ROBERT PAUL HORTON**

Now come Defendants Kisling, Nestico & Redick, LLC, by and through undersigned counsel, and hereby gives notice, pursuant to Ohio Rules of Civil Procedure, including but not limited to Civil Rule 30, that Plaintiff will take the videotaped deposition duces tecum of Defendant, Robert Paul Horton, as follows:

Date: Monday, November 26, 2018
Time: 10:00 a.m.
Location: Thomas A. Skidmore Co., L.P.A.
One Cascade Plaza, 12th Floor
PNC Center Building, Akron, OH 44308

The deposition will be taken by an official stenographer, videographer, and/or other person authorized by law to administer oaths and will be continued until conclusion. The deponent, Robert Paul Horton, Esq., is commanded to bring with him to the deposition the documents and items listed in attached Exhibit "A".

Respectfully Submitted,

/s/ Thomas P. Mannion

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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 *Notice of Deposition Duces Tecum of Robert Horton* was filed electronically and sent via email to the below parties on this 11th day of October 2018. The parties, through counsel, may also access this document through the Court's electronic docket system:

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/s Thomas P. Mannion

Thomas P. Mannion (0062551)
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EXHIBIT "A"

1. Any and all documents, writings, photographs, screen shots, computer files, electronic correspondence, tape recordings, emails, letters, notes, or any other tangible items relating to any communications Mr. Horton has had with Peter Pattakos, Esq., Dean Williams, Joshua R. Cohen, Ellen M. Kramer or Subodh Chandra.
2. Any and all documents, writings, photographs, screen shots, computer files, electronic correspondence, tape recordings, emails, letters, notes, or any other tangible items relating to any communications Mr. Horton has had with Thera Reid, Member Williams, Matthew Johnson, Monique Norris, Naomi Wright, or Richard Harbour.
3. Any and all documents, writings, photographs, screen shots, computer files, electronic correspondence, tape recordings, emails, letters, notes, or any other tangible items relating to any communications Mr. Horton has had with Thera Reid, Member Williams, Matthew Johnson, Monique Norris, Naomi Wright, or Richard Harbour.
4. Any and all documents or other items provided by Mr. Horton to Attorney Peter Pattakos or any other attorney for the Plaintiffs relating to Mr. Horton's employment with KNR, former or current clients of KNR, Mr. Horton's affidavit in KNR v. Horton, the present lawsuit, or the KNR v Horton lawsuit from the date of Mr. Horton's affidavit to the present.