

**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.

Respectfully Submitted,

/s/ James M. Popson

James M. Popson (0072773)

Brian E. Roof (0071451)

Sutter O'Connell

1301 East 9th Street

3600 Erievue Tower

Cleveland, OH 44114

(216) 928-2200 phone

(216) 928-4400 facsimile

jpopson@sutter-law.com

broof@sutter-law.com

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

/s/ Thomas P. Mannion

Thomas P. Mannion (0062551)

LEWIS BRISBOIS BISGAARD & SMITH
LLP

1375 E. 9th Street, Suite 2250

Cleveland, Ohio 44114

Tel. 216.344.9422

Fax 216.344.9421

Tom.Mannion@lewisbrisbois.com

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:

Thomas A. Skidmore, Esq.
Thomas A. Skidmore Co., L.P.A.
One Cascade Plaza, 12th Floor
PNC Center Building
Akron, OH 44308
thomasskidmore@rrbiznet.com
Counsel for Plaintiff

Peter Pattakos, Esq.
Daniel Frech, Esq.
The Pattakos Law Firm, LLC
101 Ghent Road
Fairlawn, OH 44333
peter@pattakoslaw.com
dfrech@pattakoslaw.com
Counsel for Plaintiff

Joshua R. Cohen, Esq.
Cohen Rosenthal & Kramer, LLP
The Hoyt Block Building, Suite 400
Cleveland, OH 44113
jcohen@crklaw.com
Counsel for Plaintiff

/s Thomas P. Mannion

Thomas P. Mannion (0062551)
LEWIS BRISBOIS BISGAARD & SMITH LLP