

IN THE COMMON PLEAS COURT OF SUMMIT COUNTY, OHIO  
CIVIL DIVISION

MEMBER WILLIAMS, et al.	:	CASE NO. CV-2016-09-3928
	:	
Plaintiffs,	:	(Hon. James A. Brogan)
	:	
-vs-	:	
	:	
KISLING, NESTCO & REDICK, LLC, et	:	<b>MOTION TO EXTEND DEADLINE TO</b>
al.	:	<b>RESPOND TO SUPPLEMENTAL</b>
	:	<b>PLEADING</b>
Defendants.	:	

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Now comes Sam Ghoubrial, M.D., by and through counsel, and hereby moves the court to set/extend the deadline to provide a response to Plaintiff’s supplemental pleading to Monday, October 29, 2018. This request is made in the interests of justice and not for purposes of delay, and is merely seeking a few additional days to enable a fair and reasonable response to the Plaintiff’s most recent pleading.

Respectfully submitted,

/s/: **Patrick K. Adkinson**

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## MEMORANDUM

As this Court is aware, Plaintiffs in this matter filed a motion on/about September 6, 2018 to amend their pleadings to add Dr. Ghoubrial to this litigation. Responsive pleadings were filed and this honorable Court held a telephone conference on/about September 27, 2018. *see* Entry & Order, filed October 1, 2018.

Thereafter, on/about October 4, 2018 Plaintiff filed a Supplement to Plaintiff's Motion for Leave to File Fourth Amended Complaint. This counsel did not receive service of that pleading and became aware of it incidentally on the afternoon of October 11, 2018. Counsel is in the process of preparing a response to the supplement and due to the press of other business merely needs a few additional days to complete the response. Such time will have no significant adverse impact on this matter or any of the parties.

It should also be noted that Defendants, Kisling, Nestico & Redick, LLC et al filed a motion on October 5, 2018 requesting a hearing on the October 4, 2018 Supplement filed by Plaintiff, and that hearing has yet to be set. Thus, the setting / extending of the responsive pleading deadline to October 29, 2018 will have no adverse effect on this matter.

Attached is a proposed Entry granting this motion for leave.

Respectfully submitted,

/s/: ***Patrick K. Adkinson***

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*Attorney for Sam Ghoubrial, M.D.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this Notice has been filed electronically on this **22<sup>nd</sup> day of October 2018**, and will be served to all registered parties thru the Clerk of Courts E-Filing system.

/s/: ***Patrick K. Adkinson***

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Patrick K. Adkinson (0016980)

IN THE COMMON PLEAS COURT OF SUMMIT COUNTY, OHIO  
CIVIL DIVISION

MEMBER WILLIAMS, et al.	:	CASE NO. CV-2016-099-3928
	:	
Plaintiffs,	:	Hon. James A. Brogan
	:	(sitting by Assignment #18JA1214)
-vs-	:	
	:	
KISLING, NESTICO & REDICK, LLC, et al.	:	<b>ENTRY SETTING SUBMISSION DATE FOR FILING RESPONSIVE PLEADING TO SUPPLEMENTAL PLEADING FILED BY PLAINTIFFS</b>
Defendants.	:	

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Upon motion of non-party Sam Ghoubril, M.D. and for good cause shown, the Court hereby sets the deadline for such non-party to provide a response to Plaintiffs' Supplement to their motion for leave to file a Fourth Amended Complaint for **Monday, October 29, 2018**.

IT IS SO ORDERED.

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HON. JAMES A. BROGAN  
sitting by Assignment #18JA1214  
Pursuant to Art. IV, Sec. 6  
Ohio Constitution

cc: The clerk of courts shall serve all parties of record