

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

MEMBER WILLIAMS, et al.,

Plaintiffs,

v.

KISLING, NESTICO & REDICK, LLC, et al.,

Defendant.

Case No.: 2016-09-3928

Judge: James Brogan

**DEFENDANTS' JOINT UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS'
PENDING DISCOVERY MOTIONS**

Now come Defendants, Sam Ghoumbrial, M.D., Minas Floros D.C., Kisling, Nestico & Redick, LLC, Alberto R. Nestico, and Robert Redick (collectively, the "Defendants"), by and through undersigned counsel, and hereby move this Honorable Court for a seven-day extension of time, until and including **January 7, 2019**, to file responses to Plaintiffs' five currently pending discovery motions filed on December 20th and December 21st, 2018. This includes Plaintiffs' Motion for a Protective Order Barring Speaking Objections at Depositions; Plaintiffs' Motion to Compel the Continued Deposition of Richard Gunning, M.D.; Plaintiffs' Motion to Compel Discovery from Defendant Sam Ghoumbrial; Plaintiffs' Motion to Compel Discovery from Defendant Minas Floros; and Plaintiffs' Opposition to the KNR Defendants' Motion for Protective Order Regarding the Rules of Professional Conduct. Upon granting of this Motion, deadlines for responses to each aforementioned pending motion will be extended to Monday, January 7, 2019.

The purpose of this extension is to allow for adequate time to appropriately respond to the Plaintiff's pending motions, as the holiday season has presented timing difficulties for the

Defendants. This Motion is made in good faith and not for purposes of delay. Undersigned Counsel contacted Plaintiffs' Counsel on December 27, 2018 and Plaintiffs' Counsel affirmed that Plaintiffs would not oppose this Motion for a seven-day extension. As such, this Motion is unopposed. A Proposed Order is attached hereto.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was filed electronically with the Court and sent via email to the below parties on this 27th day of December 2018. The parties, through counsel, may also access this document through the Court's electronic docket system:

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