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

MEMBER WILLIAMS, et al.,

Case No.: CV-2016-09-3928

Plaintiffs,

Judge James Brogan

v.

KISLING, NESTICO & REDICK, LLC, et al.

Defendants.

**DEFENDANTS' NOTICE OF** VIDEOTAPED DEPOSITION 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 of Defendant, Robert Paul Horton, as follows:

Wednesday, January 23, 2019 Date:

Time: 9:00 a.m.

Thomas A. Skidmore Co., L.P.A. Location:

One Cascade Plaza, 12<sup>th</sup> 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/ Thomas P. Mannion

/s/ Thomas P. Mannion

Thomas P. Mannion (0062551)

LEWIS BRISBOIS BISGAARD & SMITH LLP

1375 E. 9<sup>th</sup> Street, Suite 2250

Cleveland, Ohio 44114

Tel. 216.344.9422

Fax 216.344.9421

Tom.Mannion@lewisbrisbois.com

/s/ James M. Popson

James M. Popson (0072773)
Brian E. Roof (0071451)
Sutter O'Connell
1301 East 9th Street
3600 Erieview 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

4813-7372-3781.1

## **CERTIFICATE OF SERVICE**

Pursuant to Civ.R. 5(B)(2)(f), the undersigned certifies that a copy of the foregoing *Notice of Deposition of Robert Horton* was filed electronically and sent via email to the below parties on this 4<sup>th</sup> day of January, 2019. 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.
The Pattakos Law Firm, LLC
101 Ghent Road
Fairlawn, OH 44333
peter@pattakoslaw.com
dfrech@pattakolaw.com
Counsel for Plaintiff

Joshua R. Cohen, Esq.
Cohen Rosenthal & Kramer, LLP
The Hoyt Block Building, Suite 400
Cleveland, OH 44113
<a href="mailto:jcohen@crklaw.com">jcohen@crklaw.com</a>
Counsel for Plaintiff

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

4813-7372-3781.1