

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

<p>MEMBER WILLIAMS, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>KISLING, NESTICO & REDICK, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 2016-CV-09-3928</p> <p>Judge James Brogan</p> <p>Response to the KNR Defendants' Motion to Stay Consideration of Plaintiffs' Motion for Sanctions</p>
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Plaintiffs do not oppose the KNR Defendants' request for a stay of briefing on and consideration of Plaintiffs' 03/06/2019 motion for sanctions, and would indeed prefer, as Defendants have requested, that this issue be stayed until class certification is resolved. Plaintiffs are, however, certain that Defendants do not legitimately need any discovery, as they claim in their motion for a stay (at page 1), to know that sanctions are warranted on their dismissed counterclaims. Nor are Defendants entitled to discovery "on the merits of the counterclaims," as they suggest in their motion (at page 1), given that the counterclaims are no longer pending.

Respectfully submitted,

/s/ Peter Pattakos

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Certificate of Service

The foregoing document was filed on March 15, 2019, using the Court's electronic-filing system, which will serve copies on all necessary parties.

/s/ Peter Pattakos

Attorney for Plaintiffs