

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

MEMBER WILLIAMS, et al.,)	CASE NO. CV-2016-09-3928
)	
Plaintiffs,)	JUDGE JAMES A. BROGAN
)	
v.)	
)	
KISLING, NESTICO & REDICK, LLC, et al.,)	<u>DEFENDANTS' NOTICE OF DEPOSITION OF</u>
)	<u>AMANDA LANTZ DUCES TECUM</u>
Defendants.)	
)	
)	

Please take notice that, pursuant to the Ohio Rules of Civil Procedure, Defendants Kisling, Nestico & Redick, LLC, Alberto R. Nestico, and Robert Redick, by and through undersigned counsel, will take the discovery deposition of **Amanda Lantz**, upon oral examination, on **Thursday, March 28, 2019 at 10:00 a.m.** at the offices of Kisling, Nestico & Redick, 3412 West Market St., Akron, OH 44333 (Phone: 330-869-9007), before a notary public. The deposition will be taken stenographically and by audiovisual reporting. Said deposition will continue from day to day until completed.

In addition to appearing for oral examination, it is requested that the deponent bring to the deposition the documents listed on Exhibit A attached hereto.

Respectfully submitted,

/s/ James M. Popson
 James M. Popson (0072773)
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Counsel for Defendants
 Kisling, Nestico & Redick LLC, Alberto R.
 Nestico, and Robert Redick

EXHIBIT A

DEFINITIONS

- a. "KNR" means Defendant Kisling, Nestico & Redick, LLC, and all of its officers, directors, employees, agents, partners, members, shareholders, affiliates, representatives, and all other persons acting on its behalf.
- b. "Communications" means any written or oral statement or notation of any nature, including but not limited to conversations, correspondence, dialogue, discussions, electronic communication (including, without limitation, electronic mail, texting, Twitter, etc.), facsimile, interviews, consultations, meetings, telephone calls, letters, telecopies, telephone logs, diaries, agreements, gatherings, and other understandings between or among two or more persons, and all other forms of oral or written expression by which information may be conveyed.
- c. "Documents" means any and all records, statements, memoranda, reports, letters, notes, messages, written communications, written contacts, correspondence, emails, text messages, social media communications (e.g., Twitter and Facebook), contracts, forms, manuals, charts, graphs, data sheets, spreadsheets, bulletins, computer runs, journals, ledgers, books, bills, transcripts, checks, drafts, photographs, audio and/or video tape recordings, mechanical and/or electrical records, electronic documents, computer documents, punch cards, print-out sheets, notes, books of account, brochures, circulars, magazines, notebooks, diaries, calendars, appointment books, tables, papers, minutes of meetings of any kind, drafts of any documents, data processing disks or tapes or computer produced interpretations of the above, and any and all tangible items or written matter whatsoever of any kind or nature in your possession or control.
- d. "Person" means natural persons, firms, partnerships, associations, corporations, joint ventures, and any other entity or organization.

REQUESTS

1. Any and all communications, contacts, documents, or any other tangible items provided by Amanda J. Lantz (or anyone on her behalf) to the following:
 - a. Member Williams
 - b. Thera Reid
 - c. Naomi Wright
 - d. Monique Norris
 - e. Matthew Johnson
 - f. Richard Harbour
 - g. Peter Pattakos, Esq.
 - h. Rachel Hazlet, Esq.
 - i. Dean Williams, Esq.
 - j. Joshua Cohen, Esq.
 - k. Ellen Kramer, Esq.
 - l. Subodh Chandra, Esq.

- m. Any lawyer or other representative of the persons listed in 1(a) through 1(n), above
2. Any and all communications, contacts, documents, or any other tangible items provided to Amanda J. Lantz (or any of her representatives) by any of the persons listed in 1(a) through 1(o), above.
3. All communications, documents, or any other tangible items taken by Amanda J. Lantz from KNR and/or still in possession of Amanda J. Lantz relating to:
 - a. Email correspondence to and from KNR clients;
 - b. Internal email correspondence between KNR attorneys and/or KNR employees;
 - c. KNR policies, procedures, practices, suggestions, fliers, protocols, guidelines, or any other similar items;
 - d. Investigator fees for KNR clients;
 - e. Narrative reports for chiropractors or health care providers for KNR clients;
 - f. Trigger point injections for KNR clients;
 - g. Dr. Ghoubrial and/or Clearwater Billing;
 - h. Dr. Floros and/or Akron Square Chiropractic;
 - i. Dr. Plambeck;
 - j. TENS units for KNR clients;
 - k. Representation of KNR clients;
 - l. KNR marketing or advertising;
 - m. Alleged quid pro quo arrangements between KNR and any chiropractor or health care provider; and
 - n. Alleged quid pro quo arrangements between KNR and Liberty Capital, Preferred Capital, Oasis, or any other loan company or company that provides services similar to Liberty Capital, Preferred Capital, and/or Oasis.
4. Any and all communications between Amanda J. Lantz and any current or former KNR attorneys or employees relating to any of the issues listed in 3(a) through 3(n), above.

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March, 2019, the Notice of Deposition of Amanda Lantz Duces Tecum was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ James M. Popson
James M. Popson (0072773)