

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,	:	Case No. CV-2016-09-3928
	:	
Plaintiffs,	:	Judge James A. Brogan
	:	
vs.	:	
	:	NOTICE OF FILING AFFIDAVIT
KISLING, NESTICO & REDICK, LLC, et	:	OF BRANDY R. GOBROGGE
al.	:	
	:	
Defendants	:	

The KNR Defendants hereby give notice of filing the Affidavit of Brandy R. Gobrogge. The Affidavit is attached hereto as Exhibit A.

Respectfully submitted,

/s/ George D. Jonson
 GEORGE D. JONSON (83926)
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Counsel for Defendants Kisling, Nestico & Redick, LLC, Alberto R. Nestico, and Robert W. Redick

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ George D. Jonson
GEORGE D. JONSON

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

MEMBER WILLIAMS, et al,

Plaintiffs,

-vs-

KISLING, NESTICO & REDICK,
LLC, et al,

Defendants.

CASE NO.: 2016 09 3928

JUDGE JAMES BROGAN

AFFIDAVIT OF
BRANDY R. GOBROGGE

Now comes Affiant, Brandy R. Gobrogge, having first been sworn upon her oath, and attests as follows:

1. I am of legal age, sound mind and otherwise competent to testify.
2. This affidavit is based on my personal knowledge.
3. I have been employed by Kisling, Nestico & Redick, LLC (“KNR”) since 2010, in various positions, including my current role as Director of Operations.
4. During my tenure at the firm, I have been familiar with the KNR office facilities and locations throughout the state of Ohio.
5. From the time I started working at KNR in 2010, up until August of 2018, KNR’s “Youngstown” office was located at 4790 Market Street, Boardman, Ohio 44512. In August of 2018, the office was moved to its present address of 22 East McKinley Way, Suite A, Poland, Ohio 44514.
6. Specifically, in November of 2012, KNR’s Youngstown office was located at the 4790 Market Street address in Boardman. There is a Popeyes Chicken fast food restaurant located at 40 W Midlothian Blvd, which was 0.8 miles from the KNR Youngstown office

at the time, a driving distance of 2 minutes according to Google Map directions attached hereto as **Exhibit 1**.

FURTHER AFFIANT SAYETH NAUGHT.

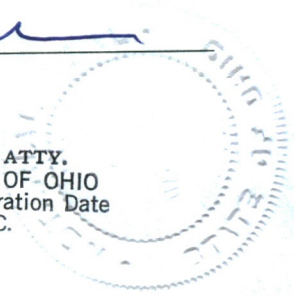

BRANDY R. GOBROGGE

STATE OF OHIO)
)SS;
COUNTY OF SUMMIT)

Affiant, Brandy R. Gobrogge, appeared in my presence this 29th day of March, 2019, and having first been sworn upon her oath, attested that the facts stated in this Affidavit are true to the best of her knowledge.


NOTARY PUBLIC

JOHN J. REAGAN, ATTY.
NOTARY PUBLIC • STATE OF OHIO
My Commission Has No Expiration Date
Section 147.03 O.R.C.







4790 Market St, Youngstown, OH 44512 to Popeyes Louisiana Kitchen



Drive 0.8 mile, 2 min



Map data ©2019 Google 500 ft

 via OH-7 N/Market St **2 min**
Fastest route, lighter traffic than usual 0.8 mile

 via OH-7 N/Market St and Hillman St **2 min**
Some traffic, as usual 0.8 mile

 11:10 AM–11:16 AM **6 min**
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