

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al

Plaintiffs,

v.

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

Defendants.

Case No. CV-2016-09-3928

Judge James Brogan

**Julie Ghoubrial's Motion to Reconsider
Court's April 18, 2019 Oral Order
Mandating She Testify Regarding Privileged
Communications Over Objection**

Now comes non-party witness, Julie Ghoubrial, by and through counsel, and hereby respectfully requests this Court reconsider its oral Order of April 18, 2019 with regards to her appearance and testimony at deposition in this matter.

Ms. Ghoubrial is a reluctant deponent in this matter and does not wish to participate, if not necessary.

Ms. Ghoubrial does not have any information with regards to her former husband's business practices and she will not be able to provide any direct testimony with regards to the issues which appear to be relevant in this matter. She has no information with regards to her former husband's current or future business concerns.

In addition, it should be noted that Ms. Ghoubrial intends to exercise her spousal immunity whenever appropriate, when asked questions in a deposition setting.

For these reasons, Ms. Ghoubrial, by and through counsel, respectfully requests this Court reconsider its oral Order of April 18, 2019 with regards to her testimony as a deponent in this matter.

Respectfully Submitted,

/s/ Gary M. Rosen

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Supreme Ct. #0009414

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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 e-mail to the below parties on this 23th day of April, 2019. The parties, through counsel, may also access this document through the Court's electronic docket system:

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