

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

MEMBER WILLIAMS, et al.,

Plaintiffs,

v.

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

Defendant.

Case No.: 2016-09-3928

Judge: James Brogan

**DEFENDANTS' MOTION FOR LEAVE
TO FILE THE DEPOSITION
TRANSCRIPT OF PLAINTIFF,
RICHARD HARBOUR, UNDER SEAL
PURSUANT TO THIS COURT'S
SEPTEMBER 12, 2017 PROTECTIVE
ORDER**

Now come the KNR Defendants, by and through counsel, and hereby respectfully move this Honorable Court for leave to file the following documents under seal:

1. The Deposition transcript of Plaintiff, Richard Harbour, dated February 2, 2019, including any and all attached Exhibits.

Defendants designate the abovementioned documents as material that is CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER. Therefore, pursuant to Section 4, Page 3 of the Court's September 12, 2017 Protective Order, Defendants respectfully request that the Honorable Court grant Defendants leave to file the deposition transcript, and its attached exhibits, of Plaintiff, Richard Harbour.

Respectfully submitted,

/s/ James M. Popson

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Counsel for KNR Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically with the Court on this 6th day of May, 2019. The parties may access this document through the Court's electronic docket system.

/s/ James M. Popson _____

James M. Popson (0072773)