

**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,
MEMBER WILLIAMS, 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, Member Williams, dated April 18, 2018, 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, Member Williams.

Respectfully submitted,

/s/ James M. Popson

James M. Popson (0072773)
SUTTER O'CONNELL CO.
1301 East 9th Street
3600 Erieview Tower
Cleveland, Ohio 44114
(216) 928-2200 phone
(216) 928-4400 facsimile
jpopson@sutter-law.com

Thomas P. Mannion (0062551)
Lewis Brisbois
1375 E. 9th Street, Suite 2250
Cleveland, Ohio 44114
(216) 344-9467 phone
(216) 344-9241 facsimile
Tom.mannion@lewisbrisbois.com

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)