

**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  
TRANSCRIPTS OF PLAINTIFF,  
MONIQUE NORRIS, 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, Monique Norris, dated January 28, 2019, including any and all attached Exhibits; and
2. The Deposition transcript of Plaintiff, Monique Norris, dated May 6, 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 transcripts, and its attached exhibits, of Plaintiff, Monique Norris.

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](mailto:jpopson@sutter-law.com)

Thomas P. Mannion (0062551)  
Lewis Brisbois  
1375 E. 9<sup>th</sup> Street, Suite 2250  
Cleveland, Ohio 44114  
(216) 344-9467 phone  
(216) 344-9241 facsimile  
[Tom.mannion@lewisbrisbois.com](mailto: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 6<sup>th</sup> 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)