

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.)	CASE NO.: 2016-CV-09-3928
)	
Plaintiffs,)	JUDGE JAMES BROGAN
)	
- vs -)	
)	
KISLING, NESTICO & REDICK, LLC, et al.)	<u>RESPONSE TO PLAINTIFFS'</u>
)	<u>MOTION TO COMPEL</u>
Defendants.)	<u>PRODUCTION OF DIVORCE</u>
)	<u>DECREE BETWEEN</u>
)	<u>DEFENDANT SAM GHOUBRIAL</u>
)	<u>AND NON-PARTY JULIE</u>
)	<u>GHOUBRIAL</u>

Comes now Non-Party Julie Ghoubril by and through counsel and files her Response to Plaintiffs' Motion to Compel Production as follows:

Plaintiffs are requesting that Defendant Sam Ghoubril and Non-Party Julie Ghoubril provide a copy of their Divorce Decree to Plaintiffs for purposes of establishing that Non-Party Julie Ghoubril has or had knowledge about Defendant Sam Ghoubril's business practices.

It should first be noted that Non-Party Julie Ghoubril has not yet provided any testimony in this case. Plaintiffs' attempt to obtain a copy of the Divorce Decree between Defendant Sam Ghoubril and Non-Party Julie Ghoubril is an attempt to attack the credibility of Non-Party Julie Ghoubril. But Non-Party Julie Ghoubril has not provided any evidence or testimony in this case to date.

Plaintiffs wish to invade the privacy of Defendant Sam Ghoubril and Non-Party Julie Ghoubril on Plaintiffs' theory that Non-Party Julie Ghoubril will at some time in the future provide false and misleading testimony or evidence to this Court.

In other pleadings with this Court, Plaintiffs have indicated that they wish to delay testimony of Non-Party Julie Ghoubrial.

If her testimony is being delayed, then there is absolutely no reason whatsoever to attack her credibility today and as part of an attack on her credibility, to search through her Divorce Decree for “clues” as to her inconsistent testimony.

Plaintiffs’ attempt to review a Divorce Decree which has extremely confidential information with regards to family matters of Defendant Sam Ghoubrial and Non-Party Julie Ghoubrial, including property division, parenting and support related issues, is a blatant attempt to pry into personal lives for absolutely no substantive reason related to this action.

Plaintiffs’ Motion to Compel Production of the Divorce Decree between Defendant Sam Ghoubrial and Non-Party Julie Ghoubrial should be summarily dismissed.

/s/ Gary M. Rosen

GARY M. ROSEN

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 7th day of May 2019. The parties, through counsel, may also access this document through the Court's electronic docket system:

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