

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, <i>et al.</i> ,  Plaintiffs, vs.  KISLING, NESTICO & REDICK, LLC, <i>et al.</i> ,  Defendants.	Case No. 2016-CV-09-3928  Judge James A. Brogan  <b>Plaintiffs' Motion for Leave to File under Seal the Deposition Transcript of Defendant Floros</b>
--	---

Plaintiffs hereby seek leave to file the deposition transcript of Defendant Minas Floros, D.C., under the September 12, 2017 protective order. *See* protective order, Section 8.d, p. 9 (“a party seeking to file a brief, pleading, or exhibit under seal shall first file a motion for leave to file under seal prior to filing such brief, pleading, or exhibit”); and Section 8.c, p. 8 (“To the extent that it is necessary for a party to discuss the contents of any confidential information ... in a written pleading, then such portion ... may be filed under seal with leave of court.”).

Defendant Floros, as with the other Defendants before him, has marked the entirety of his deposition transcript as “confidential.” Upon receiving the requisite designations from Defendant Floros, Plaintiffs will promptly file a copy of the transcript reflecting those portions marked as “confidential” under the protective order. Accordingly, until Plaintiffs receive more specific confidentiality designations relating to Defendant Floros’s deposition testimony, good cause exists to grant Plaintiffs leave to file the deposition transcript of Defendant Floros under seal.

Respectfully submitted,

/s/ Rachel Hazelet

Peter Pattakos (0082884)  
Rachel Hazelet (0097855)  
THE PATTAKOS LAW FIRM LLC  
101 Ghent Road  
Fairlawn, Ohio 44333  
Phone: 330.836.8533  
Fax: 330.836.8536  
peter@pattakoslaw.com  
rhazelet@pattakoslaw.com

Joshua R. Cohen (0032368)  
Ellen Kramer (0055552)  
COHEN ROSENTHAL & KRAMER LLP  
3208 Clinton Avenue  
Cleveland, Ohio 44113  
Phone: 216.781.7956  
Fax: 216.781.8061  
jcohen@crklaw.com  
emk@crklaw.com

*Attorneys for Plaintiffs*

### **Certificate of Service**

The foregoing document was filed on May 8, 2019, using the Court's electronic-filing system, which will serve copies on all necessary parties.

/s/ Rachel Hazelet

*Attorney for Plaintiffs*