

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,

Plaintiffs,

v.

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

Defendants.

Case No. CV-2016-09-3928

Judge James Brogan

**Dr. Sam Ghoubrial's Notice of Filing
Affidavits**

Now comes Defendant, Dr. Sam Ghoubrial, by and through his undersigned counsel, and hereby gives notice of filing the Affidavits of Dr. Tony Lababidi. The Affidavits are attached hereto as Exhibits A and B.

Respectfully Submitted,

/s/ Bradley J. Barmen

Bradley J. Barmen (0076515)
LEWIS BRISBOIS BISGAARD & SMITH LLP
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Brad.Barmen@lewisbrisbois.com
Counsel for Defendant Dr. Sam Ghoubrial

CERTIFICATE OF SERVICE

The undersigned certifies that on the 13th day of May, 2019, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of this filing to all attorneys of record.

/s/ Bradley J. Barmen

Bradley J. Barmen
Counsel for Defendant
Sam N. Ghoubrial, M.D.

STATE OF OHIO)
) SS: AFFIDAVIT
 COUNTY OF SUMMIT)

I, Tony Lababidi, Affiant, being first duly sworn, have personal and firsthand knowledge of all facts contained herein and am competent to testify to the following:

1. I am a licensed physician in the state of Ohio and was duly licensed at all times relevant herein.
2. I have reviewed the invoices and charges for TENS Units and for Trigger Point Injections.
3. The charges reflected in the invoices reviewed are standard in the industry in Summit County area.
4. I am familiar with what Dr. Sam Ghoubrial's practice charges for TENS Units and for Trigger Point Injections. Dr. Ghoubrial's charges for these treatments are not artificially inflated and they fall within the standard range charged in the Summit County area.
5. I know there are practioners in the area that charge more for both TENS Units and Trigger Point Injections than Dr. Ghoubrial
6. Further affiant sayeth naught.

Tony Lababidi

SWORN TO BEFORE ME and subscribed in my presence this 13th day of May, 2019.



BRITTANY PETERSON
 NOTARY PUBLIC - OHIO
 MY COMMISSION EXPIRES 11-26-2022

[Signature]
 NOTARY PUBLIC



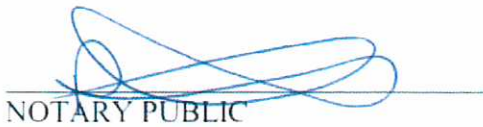
STATE OF OHIO)
) SS: AFFIDAVIT
 COUNTY OF SUMMIT)

I, Tony Lababidi Affiant, being first duly sworn, have personal and firsthand knowledge of all facts contained herein and am competent to testify to the following:

1. I am employed in the medical field in Summit County, Ohio.
2. I have reviewed the attached invoices and charges for TENS Units and for Trigger Point Injections.
3. The charges reflected in the invoices reviewed are standard in the industry in Summit County area.
4. While I have seen lower charges for TENS Units and for Trigger Point Injections, I have also seen higher charges in the area for both forms of treatment.
5. These are standard charges that reflect more than the just the cost of the treatment provided.
6. Further affiant sayeth naught.



SWORN TO BEFORE ME and subscribed in my presence this 13th day of May, 2019.


 NOTARY PUBLIC



BRITTANY PETERSON
 NOTARY PUBLIC - OHIO
 MY COMMISSION EXPIRES 11-26-2022

