

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al., Plaintiffs, vs. KISLING, NESTICO & REDICK, LLC, <i>et al.</i> , Defendants.	Case No. CV-2016-09-3928 Judge James A. Brogan Notice of Filing Volume II of Exhibits to the Deposition of Robert Horton
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Plaintiffs hereby give notice of filing Volume II of exhibits to the deposition of Robert Horton, taken on February 25 and 26, 2019, attached as **Exhibit A**.

Respectfully submitted,

/s/ Rachel Hazelet

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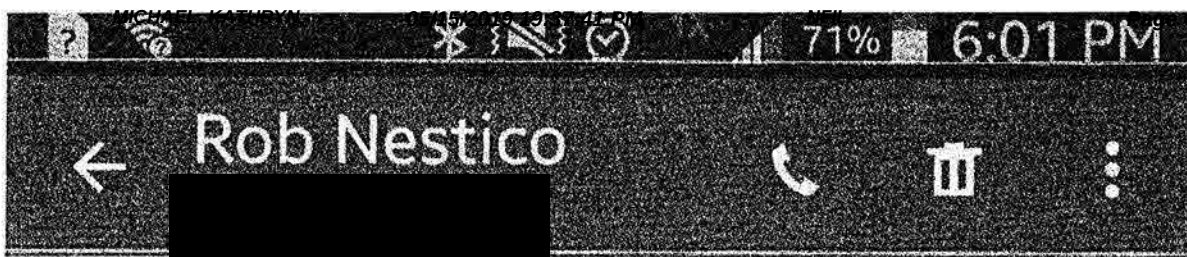
Attorneys for Plaintiffs

Certificate of Service

The foregoing document was filed on May 15, 2019, using the Court's electronic-filing system, which will serve copies on all necessary parties.

/s/ Rachel Hazelet
Attorney for Plaintiffs

EXHIBIT A



Tue, 03/17/2015



This is already hard enough. If you have anything you downloaded from this firm that Ethan will uncover please drop it off. Don't let me find out from Ethan.

8:42 AM

I'll take a look. I have some client contact stuff, but only a handful of cases. And maybe an outdated master chiro list I carried around. But I will do so asap.

8:45 AM



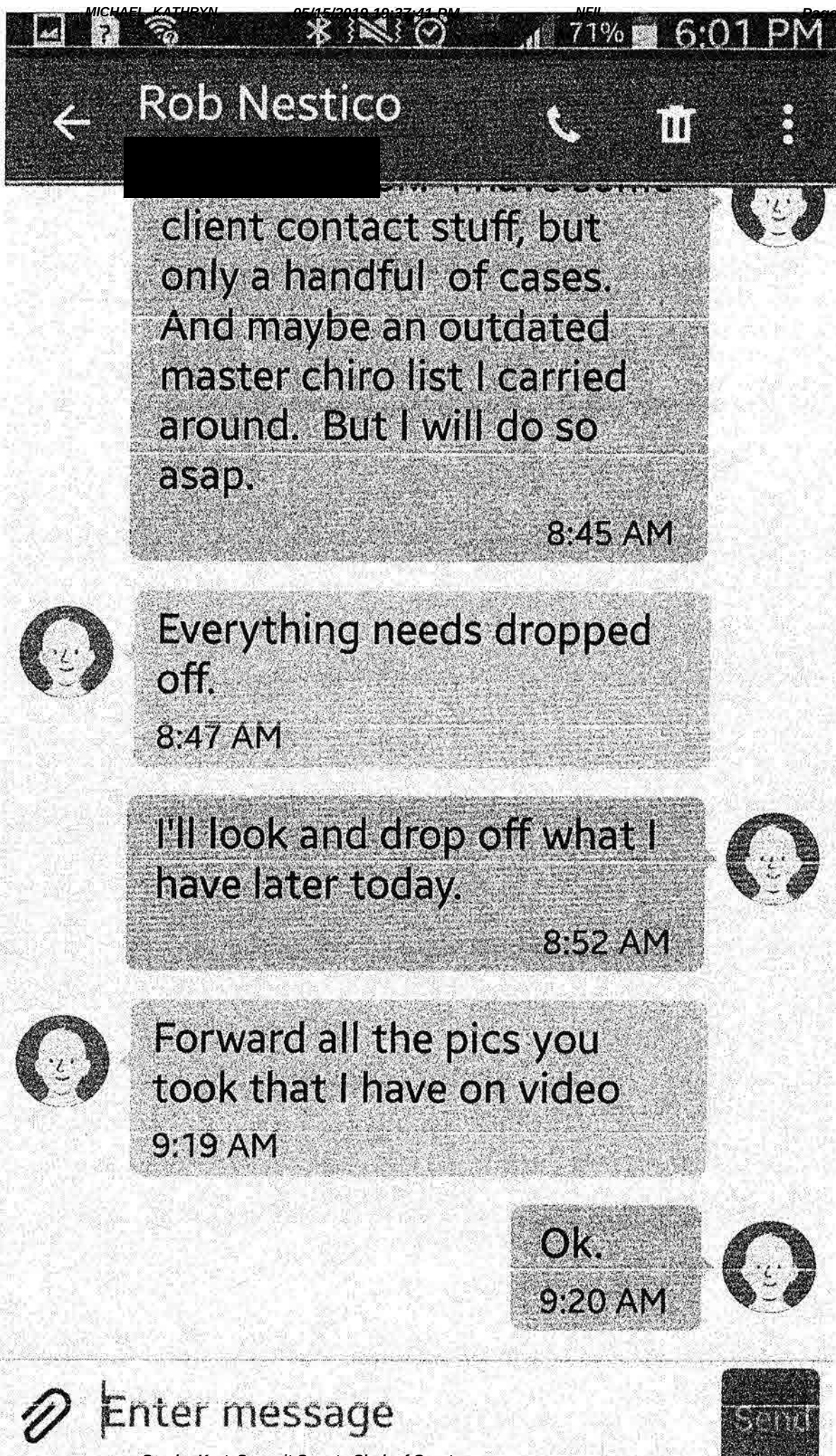
Everything needs dropped off.

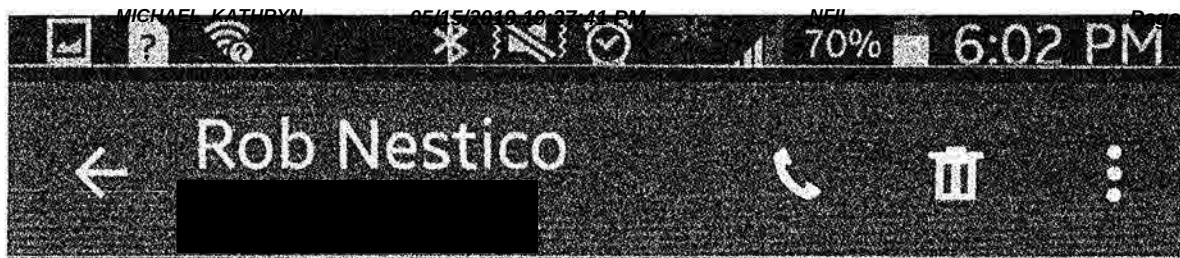
8:47 AM



Enter message







Please drop off all the client
contact info you have

9:45 AM

Will do.

9:46 AM



Is it OK to come by around
5?

10:19 AM



Please drop off asap

10:20 AM

Ok.

10:20 AM



Rob this is bad. Paul called
me and said you were
concerned about bar
complaint. I agree not to do
anything provided you do
not interfere with ANY KNR



Enter message





Rob Nestico



Rob this is bad. Paul called me and said you were concerned about bar complaint. I agree not to do anything provided you do not interfere with ANY KNR clients.

10:53 AM

I won't. Wasn't planning on it. I know I fucked up.

10:54 AM



He asked me about calling them and I didn't think I could.

10:56 AM



Not sure how it works, but I clearly don't have the resources...

10:56 AM



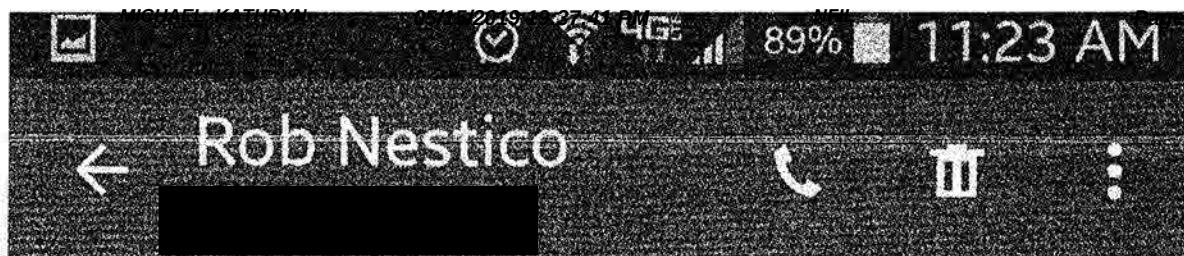
No you can't you don't represent them anymore is KNR



Enter message

Sandra Kurt, Summit County Clerk of Courts





KNR does. Any tortious interference will draw bar complaints and law suit. Trust me I know I lived it.

10:57 AM

And not that it matters, but as you saw, everything I had was stuff we already were shown at one point or another. Except the phone numbers on that statement. That is all. No other \$\$ stuff.

10:58 AM



I know this why no one understands

10:59 AM

Can you call me really quick?

11:00 AM



In a few I'm in a meeting with Danny right now



Enter message

Send



Appreciate it
5:19 PM



I am glad you were honest and returned that because that download came up on Ethan's search and that would surely cost you license. I really do hope you do well and you find employment quickly.

6:11 PM

I'm not out, nor was I ever out, to screw anybody. I told brandy and I hope she told you what I feel the worst about is you guys. I feel more guilty than anything.

6:13 PM



I was burned out. And maybe sabotaged myself.

6:13 PM



Enter message

Send



That's it.

9:27 AM



Wait.

9:27 AM



I have a pic of my chiro board. You want it. And the investigator list.

9:27 AM



For doing after hours.

9:28 AM



Yes and this is the video of Brandy's office where is all of the stuff from Julie's office

9:29 AM

The last one is it.

9:30 AM



Enter message





Hey. Cleaning out my desk stuff and found a thumb drive I used to use here and there. It had a lot of personal stuff on it, but some old stuff from KNR (fee agreement and med Auth for sign ups, an old package letter or two, important emails I saved, etc.). Most of it is from 2013, mid 2014. I can bring it in for you, but I either need it back, or I can transfer the personal stuff and drop it off for you to keep. Your call.



11:53 AM



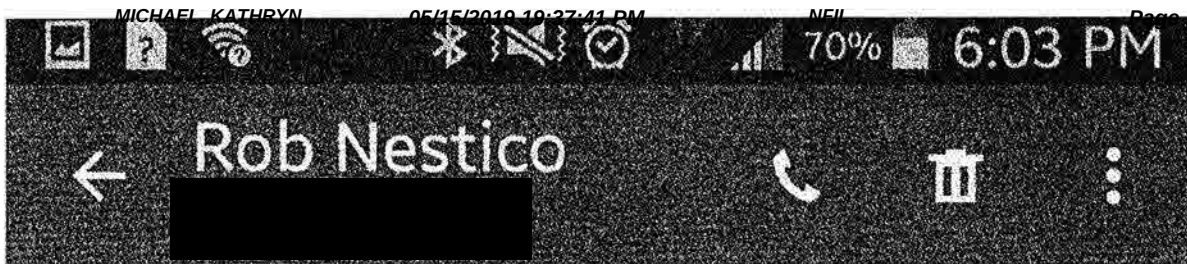
Bring it in and I will have all non KNR stuff put on disk

11:54 AM



Enter message





Are you serious your following this Amanda. Seriously. What she didn't read in those decisions is the all the case law. We demanded our client list and you returned it so it is trade secret. We contacted all our clients of your departure. What wasn't followed by either one of you is how you obtained the client list. She may want to do further research and see what rules she has violated and what she will face next. Don't be a fool. I like you but I don't like her. Don't join her file and rank.

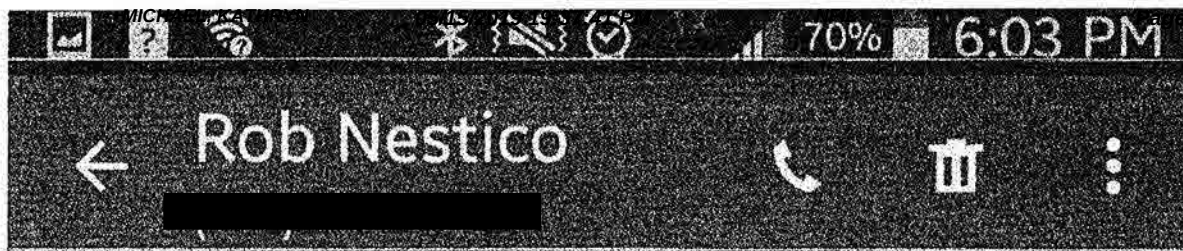
8:53 AM

She just asked if I had any case law. I sent her what I



Enter message

Send



She just asked if I had any case law. I sent her what I had. That's it. She can do what she wants. I've moved on.

8:54 AM



Smart cause I'm am going to go after her now.

8:55 AM



First a bar complaint then a law suit. She

8:55 AM



Can't read case law if it would save her life

8:56 AM



Your departure was not my wish hers was

8:56 AM



Enter message





You should talk to her let her know I'm gunning for her. I have copies of e mails to clients asking to go with her for a lower rate. She has violated so many ethical rules it's crazy.

3:02 PM



See what the nut says

3:02 PM

Hahaha. She's probably shitting her pants.

3:02 PM



She is stupid. If I so much as get one termination letter she is done. She just needs to move on.

3:03 PM

Sneaking of interview went



Enter message





And contacting our clients
by improperly obtaining
info is another

5:35 PM



Dude she hung herself. Did
you tell her to stay the fuck
away

5:35 PM

I told her it would be in her
best interest for sure.

5:36 PM



Like I said, I told her I
haven't had any problems
at all. Hint hint.

5:37 PM



Hopefully she takes the
hint, for her sake...

5:37 PM



Enter message





She doesn't get hints. If you don't tell her straight she is too stupid to figure it out

5:38 PM



I would hate to go after her but she makes one more move then I will have no choice

5:39 PM

Hahaha. She is pretty ditzy

5:39 PM



Sat, 05/02/2015

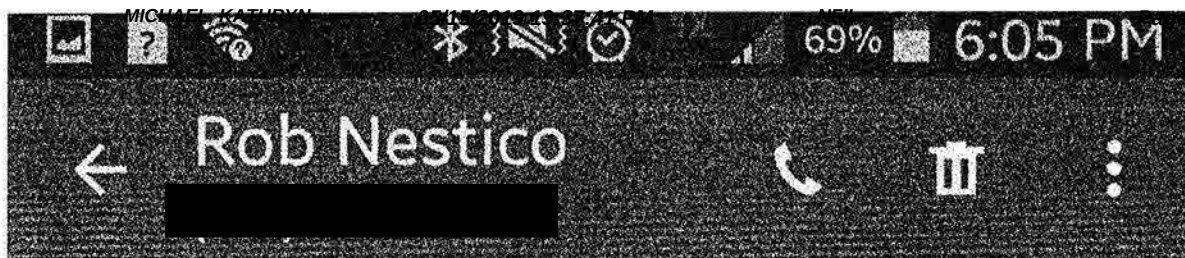
Hey. I need to come and get my USB drives, along with a copy of my confidentially agreement. I can come by monday, preferably.

4:01 PM



Enter message

Send



This girl continues to fail to tell anyone the truth. She is either ignorant or just absent minded. Either one

4:12 PM

Well, you reap what you sow I suppose.

4:15 PM



Yessir

4:21 PM



She has no idea what it means to go to war with someone who has a lot more money then her!!!!

4:22 PM



I learned when I went to battle with Eshelman it cost me 75k in legal and 50% of my fees and not



Enter message

Send



She has no idea what it means to go to war with someone who has a lot more money then her!!!!

4:22 PM



I learned when I went to battle with Eshelman it cost me 75k in legal and 50% of my fees and not even one deposition was taken. Lol

4:23 PM

Ouch.

4:24 PM



It's all fun and games until you go to war

4:24 PM

Ha.



Enter message

Send

Jen: Do you wanna take my car so I can watch

← Rob Nestico



Yep. Day 2.

12:31 PM



And? Good

12:39 PM

Yep. All good. Just training.

12:40 PM



Sat, 06/13/2015



You really need to just move on and stop spreading false rumors or you may get a lesson on a defamation case with your name on it. Remember your the one who was unethical and betrayed our friendship NOT me or KNR.

11:01 AM



Enter message

