

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

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

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
The Hoyt Block Building, Suite 400
Cleveland, Ohio 44113
Phone: 216.781.7956
Fax: 216.781.8061
jcohen@crklaw.com

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

Subject: FW: November Intakes

From: gpetti@knrlegal.com

To: pettigary@yahoo.com

Date: Monday, December 3, 2012, 4:00:16 PM EST

Gary M. Petti

Kisling, Nestico & Redick

Attorney At Law

3412 W. Market St., Akron, Ohio 44333

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown

From: Brandy Leimman

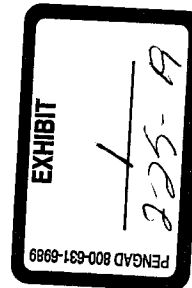
Sent: Monday, December 03, 2012 3:51 PM

To: Prett Group

Subject: November Intakes

Importance: High

Intakes During Business Hours for November:



GMP000004

Gary P	36	9%
Jason	47	11%
Josh	116	28%
Ken	56	13%
Paul	92	22%
Horton	74	18%

Just a reminder that objective cases will be assigned to the attorneys who are doing intakes!! GREAT JOB Josh!!

Brandy Lamtman
Executive Assistant to Attorney Nestico

Kisling, Nestico, & Redick, LLC
3412 W. Market Street
Akron, Ohio 44333
Phone: 330-869-9007
Fax: 330-869-9008
brandy@knlegal.com

GMP000005

Subject: FW: Objective Injury Case Assignments

From: gpetti@knrlegal.com
To: pettigary@yahoo.com
Date: Friday, November 9, 2012, 3:35:35 PM EST

Gary M. Petti

Kisling, Nestico & Redick

Attorney At Law

3412 W. Market St., Akron, Ohio 44333

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown

From: Brandy Brewer
Sent: Friday, November 09, 2012 3:32 PM
To: Prellt Attorney
Cc: Rob Nestico; Robert Redick; Holly Tusko
Subject: Objective Injury Case Assignments
Importance: High

GMP000041



From now on, objective injuries will not be distributed evenly. These cases will be distributed to the prelit attorneys that are doing intakes by percentage from the month before.

Youngstown objective cases will stay in Youngstown. Paul or whichever attorney who does the after hours intake, will get the case.

Please see below:

Percentage numbers from the month before, this is how we will distribute objective cases for the following month.

For example: Intakes October 488, but 399 were actually done by prelit attorneys. So...

Petti	28	8%
Jason	52	15%
Josh	90	27%
Ken	35	10%
Paul	76	23%
Horton	58	17%

Should you have any questions about this, please let me know.

Brandy Brewer

Kising, Nestico & Redick

Executive Assistant to Attorney Nestico

3412 W. Market St., Akron, Ohio 44333

GMP000042

5/15/2017

RE: Lending co

From: Rob Nestico
Sent: Wednesday, May 02, 2012 12:32 PM
To: Attorneys
Cc: Staff
Subject: Lending co

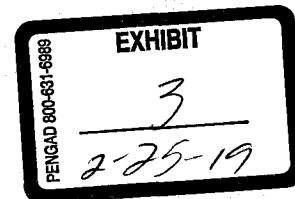
Anyone have a copy of the questionnaire sent to us when a client asks for a loan. Either from Oasis or preferred capital? Please scan it and send me a blank copy.

Thank you



Alberto R. Nestico, Esq.
Kisling, Nestico & Redick
Attorneys At Law
 3412 W. Market St., Akron, Ohio 44333
Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



Tuesday, May 5, 2015 at 11:46:49 PM Eastern Daylight Time

Subject: Re: Liberty Capital Funding

Date: Thursday, May 10, 2012 at 7:46:40 PM Eastern Daylight Time

From: Rob Nestico

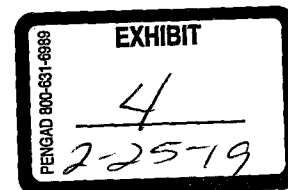
CC: Attorneys

For any Plambeck patients only please use the below company for cash advances. Thx

Rob Nestico
Attorney at Law
Kisling, Nestico & Redick

On May 9, 2012, at 1:08 PM, "Ciro Cerrato" <lcfunding1@gmail.com> wrote:

Rob,
Thanks for giving Liberty Capital Funding the opportunity to offer your clients Pre Settlement Funding.
Our settlement funding process is quick, and we can get your clients their pre settlement advance within 24 hours in most cases.
Attached is the LCF Client Data Sheet.
Please feel free to contact me if you have any questions or need anything else.
Best regards,
Ciro Cerrato
Liberty Capital Funding LLC
lcfunding1@gmail.com<<mailto:lcfunding1@gmail.com>>
PH 1.866.612.6000<tel:1.866.612.6000>
Fax: 561.372.7129<tel:561.372.7129>
<LCF Client Data Sheet.pdf>



WILLIAMS000256 1 of 1

From: Brian Zaber
Sent: Monday, February 03, 2014 5:29 PM
To: Rob Nestico
Subject: Re:

Signed it - sorry to have to involve you.

Sent from my iPhone

On Feb 3, 2014, at 5:22 PM, "Rob Nestico" <nestico@knrlegal.com> wrote:

Sent from Rob Nestico

Begin forwarded message:

From: [Ciro Cerrato <Ciro.Cerrato@gmail.com>](mailto:Ciro.Cerrato@gmail.com)
Date: February 3, 2014 at 5:13:54 PM EST
To: Rob Nestico <nestico@knrlegal.com>
Subject: Re:

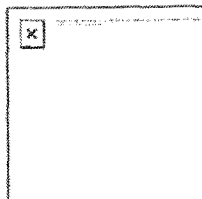
k. Thanks Rob

On Mon, Feb 3, 2014 at 4:42 PM, Rob Nestico <nestico@knrlegal.com> wrote:

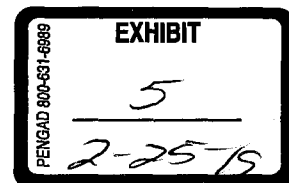
Ciro:

Can we get this client an advance of 250.00 more? Please let me know. Don't want to lose this client.

Thank you



Alberto R. Nestico
Kisling, Nestico & Redick



KNR03456

REDACTED

Re: Lending co

Page 1 of 1

Re: Lending co

Brandy Lamtman

Sent: Friday, November 30, 2012 8:19 PM

To: Rob Nestico

Oh I know. Neither of them told us about it. Ciro was going to waive. I discussed this with Robert and we decided to make attorneys pay because at some point we will need a favor from Ciro and need him to waive. I told Ciro next time they call and ask him that he needs to let me know. We will also address this at meetings. It's not up to the attorneys. It's up to you and Robert.

Sent from my iPhone

On Nov 30, 2012, at 8:10 PM, "Rob Nestico" <nestico@knrlegal.com> wrote:

> Really they better pay him.

>

> Sent from iPhone of Rob Nestico

>

> On Nov 30, 2012, at 6:30 PM, "Brandy Lamtman" <brandy@knrlegal.com> wrote:

>

>> I've been working with Ciro today. Trying to get everything up to date in our system. So far Gary P has closed 2 cases without paying and Ken 1 case.

>>

>> Sent from my iPhone

>>

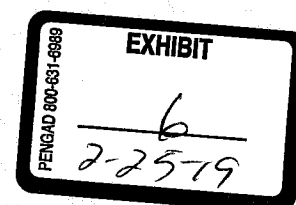
>> On Nov 30, 2012, at 6:20 PM, "Rob Nestico" <nestico@knrlegal.com> wrote:

>>

>>> Please use liberty capital until further notice.

>>>

>>> Sent from iPhone of Rob Nestico



<https://mail.knrlegal.com/owa/?ae=Item&t=IPKINR08377-AMB.RgAAAABfv%2fc6hoL...> 11/16/2017

11/20/2017

RE: Legal Funding Companies

RE: Legal Funding Companies

Brandy Brewer

Sent: Tuesday, February 03, 2015 1:40 PM

To: Staff

Just to clarify, we are back to working with both lending companies. For new loans, please offer BOTH. If they already have a loan with one, then have them call that company just as you normally would.

On a side note, Preferred Capital charges lower ongoing interest on loans.

Additionally, please do not contact Brian Moonin.



Brandy Brewer

Kisling, Nestico & Redick

Director of Operations

3412 W. Market St., Akron, Ohio 44333

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



From: Brandy Brewer

Sent: Tuesday, February 03, 2015 1:10 PM

To: Staff

Subject: Legal Funding Companies

Importance: High

Please be sure to offer two different companies to your clients, only if they request a loan. We will be working with Oasis and Preferred Capital. Our new Oasis rep's name is Kelly and we will also be working with her assistant Orlando. Please use email as your primary communication and be sure to email both of them: kelly@oasislegal.com and oherrera@oasislegal.com.

PH: 847-521-4438 Orlando

847-521-4428 Kelly

Please remember this is a business relationship, not a friendship.



Brandy Brewer

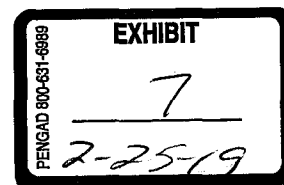
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KNR03392

From: Brandy Brewer <brandy@knrlegal.com>
Sent: Monday, June 23, 2014 2:16 PM
To: Prelit Attorney
Subject: Chiropractor Referrals.....

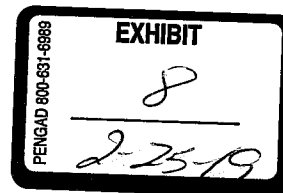
Importance: High

I have sent this email several times. Please pay attention to the chiro referral email Sarah or I send out and also, the board.

Referrals are not up for negotiation. I spend a lot of time tracking referrals and working with doctors. If you have an issue, please let me know.



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From: Brandy Brewer <bbrewer@knrlegal.com>
Sent: Wednesday, October 17, 2012 10:25 AM
To: Prelit Attorney
Subject: Shaker Square

Importance: High

PLEASE make sure you refer intakes there. I just noticed that we've sent 2 cases to A Plus Accident & Injury Center when these cases could've gone to Shaker, who sends us way more cases.

I've sent this email three times now, please note this so next time you're on a Cleveland intake you remember this.

Thanks!



Brandy Brewer

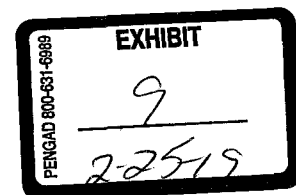
Kisling, Nestico & Redick

Executive Assistant to Attorney Nestico

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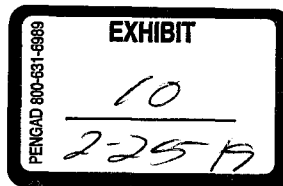
*Locations: Akron, Canton, Cleveland, Cincinnati,
Columbus, Dayton, Toledo & Youngstown*



From: **Brandy Lamtman** brandy@knrlegal.com
Subject: A Plus Injury
Date: August 21, 2013 at 2:11 PM
To: Prelit Attorney PrelitAttorney@knrlegal.com



Please do not send anymore clients there this month. We are 6 to 1 on referrals.



WILLIAMS000154

From: Brandy Lamtman <brandy@knrlegal.com>
Sent: Monday, April 8, 2013 10:12 AM
To: Prelit Attorney
Subject: Referrals

Please make sure you're paying attention to your referral board in your office. We sent 5 cases to Warrensville Physical Medicine last week. We need to get some cases to A Plus Injury since they sent us 10 cases last month and Warrensville Physical Medicine hasn't sent us ANY cases in 2013!!!!



Brandy Lamtman

Executive Assistant to Attorney Nestico

Kisling, Nestico, & Redick, LLC

3412 W. Market Street

Akron, Ohio 44333

Phone: 330-869-9007

Fax: 330-869-9008

brandy@knrlegal.com



WILLIAMS000306

From: Brandy Lamtman <brandy@knrlegal.com>
Sent: Friday, July 12, 2013 10:37 AM
To: [REDACTED]
Subject: [REDACTED]
Attachments: image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.jpg

ASC if you can. I already told Minas. Plus Cain doesn't send us shit.





Sent from my iPhone

On Jul 12, 2013, at 10:36 AM, [REDACTED]

Web referrals. They live 20 minutes form Cain chiro (ken's friend) and 30 minutes from ASC or West Tusc. Holly indicated they should go to ASC. Is that correct, or do we want to send them to somebody else closer to them?

Regards,

<image001.jpg> [REDACTED]

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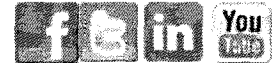
From: **Brandy Brewer** brandy@knrlegal.com
 Subject: Companions
 Date: June 19, 2014 at 2:11 PM
 To: **Prelit Attorney** PrelitAttorney@knrlegal.com
 Cc: **Holly Tusko** htusko@knrlegal.com, **Kevin Thompson** kthompson@knrlegal.com



Twice in the past week, I've learned that ASC has roped in companions from OUR referrals. You must indicate if there are companions on the intake and you MUST try to rope them in. Obviously you cannot call them, but we don't have this problem with Paul or our Columbus attorneys as they do a great job with this. This is a BIG problem in Akron.



Brandy Brewer
Kisling, Nestico & Redick
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From: Brandy Lamtman <brandy@knrlegal.com>
Sent: Thursday, November 15, 2012 8:50 AM
To: Staff
Subject: Fwd: Referrals

Sent from my iPhone

Begin forwarded message:

From: Rob Nestico <nestico@knrlegal.com>
Date: November 15, 2012, 8:22:29 AM EST
To: Rob Nestico <nestico@knrlegal.com>
Cc: Brandy Lamtman <brandy@knrlegal.com>
Subject: Referrals

Please make sure to refer ALL Akron cases to ASC this month. We are 30-0. Also any time you refer a patient to any Chiro have your assistant follow up and make sure they go on obviously cases that are signed up outside of Chiro office.

Sent from iPhone of Rob Nestico



From: Brandy Lamtman <brandy@knrlegal.com>
Sent: Tuesday, March 12, 2013 3:16 PM
To: Prelit Attorney
Cc: Rob Nestico
Subject: Chiropractor Referrals

Importance: High

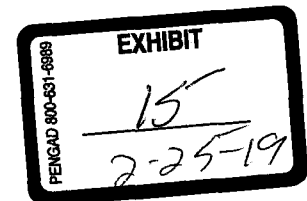
PLEASE make sure you are calling the chiro and scheduling the appointment. This has been discussed before.

Thanks



Brandy Lamtman
 Executive Assistant to Attorney Nestico
 Kisling, Nestico, & Redick, LLC
 3412 W. Market Street
 Akron, Ohio 44333
 Phone: 330-869-9007
 Fax: 330-869-9008

brandy@knrlegal.com



From: Brandy Lamtman <brandy@knrlegal.com>
Sent: Tuesday, March 26, 2013 10:55 AM
To: Attorneys
Subject: Intakes....

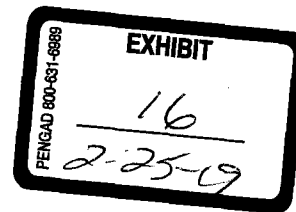
Importance: High

If you do an intake and the person already has an appointment with a chiropractor we do not work with, either pull it and send to one of our doctors or call the chiropractor directly. You MUST do this on all intakes, otherwise the chiropractor will pull and send to one of their attorneys!



Brandy Lamtman
 Executive Assistant to Attorney Nestico
 Kisling, Nestico, & Redick, LLC
 3412 W. Market Street
 Akron, Ohio 44333
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 Fax: 330-869-9008

brandy@knrlegal.com



From: Brandy Brewer <brandy@knrlegal.com>
Sent: Tuesday, December 17, 2013 9:40 AM
To: Rob Horton; Jenna Wiley
Subject:

Importance: High

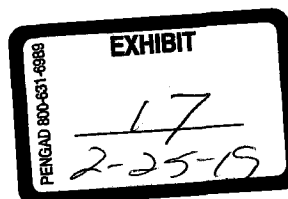
Only went to ASC one time. Please call ASAP and get back in for treatment. Can treat with PCP and chiro. Explain that Minas does PT as well. This cannot keep happening guys. Please stay up to date on all new cases as it is a critical time in the case's the MOST important part of case.



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1



WILLIAMS000380

*Cleveland,
Cincinnati,
Columbus,
Dayton, Toledo &
Youngstown*

From: Brandy Brewer
Sent: Thursday, December 18, 2014 1:39 PM
To: [REDACTED]
Cc: Rob Nestico; Robert Redick; [REDACTED]
Subject: Re: Termination

Why didn't you call him yesterday after Minas text you and asked you to call bc the guy was hesitant?

Sent from my iPhone

On Dec 18, 2014, at 12:17 PM, [REDACTED] wrote:

[REDACTED]
[REDACTED]

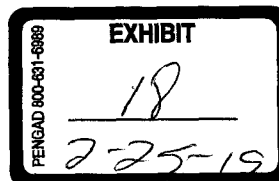
Signed up yesterday around noon while at ASC. Client called this morning and said that he does not need the services of an attorney. Tried to explain the complicating factor of having a government entity involved, immunity, etc. said that he does not need representation but will recommend us to others in the future.

Regards,

[REDACTED]

Kisling, Nestico & Redick
Attorney at Law
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Canton,
Cleveland,
Cincinnati,
Columbus,
Dayton, Toledo &
Youngstown*

<image002.gif><image003.png><image004.gif><image005.gif><imag



From: Brandy Lamtman <brandy@knrlegal.com>
Sent: Monday, September 16, 2013 9:49 AM
To: Rob Horton
Subject: My referral

Since she is a nurse, she may not want chiro. Feel her out for that before you refer. She may want family doc and PT.



From: **Brandy Lamtman** brandy@knrlegal.com
 Subject: Plambeck Clinics
 Date: October 2, 2013 at 3:14 PM
 To: **PreLit Support** PreLitSupport@knrlegal.com, **PreLit Attorney** PreLitAttorney@knrlegal.com, **Litigation Support** LitigationSupport@knrlegal.com, **Litigation Attorney** LitigationAttorney@knrlegal.com



These are the only Narrative Fees that get paid in addition to Dr. Alex Frantzis with NorthCoast Rehab (\$200.00) ((NOT PLAMBEC))

- *Akron Square Chiropractic: Dr. Minas Floros
- *Detroit Shoreway Chiropractic: Dr. Kyle Schneider
- East Broad Chiropractic: Dr. Heather Kight
- Old Town Chiropractic: Dr. Gregory Smith
- Raider Chiropractic: Dr. Michael Buczynaki
- Shaker Square Chiropractic: Dr. Drew Schwartz
- *Toledo Spine & Rehab: Dr. Patrice Lee-Seyon
- Valley Spine & Rehab: Dr. Briggs
- *Vernon Place Chiropractic: Dr. Jason Maurer
- *Werkmore Chiropractic: Dr. Jason Maurer
- Westgate Family Health: Dr. Michael Buczynaki
- *West Tusc Chiropractic: Dr. Tassi and Dr. Eric Cawley
- *Youngstown Chiropractic: Dr. Sirikul ³Ruth² Thunijinda

***Narrative Report Fees are paid to Dr. Patrice Lee-Seyon via MedReports (Toledo Spine) for **\$200.00**, Dr. Minas Floros (Akron Square) **\$200.00**, Dr. Philip Tassi for him and Dr. Eric Cawley (West Tusc) **\$200.00**, Dr. Sirikul Thunijinda (Youngstown Chiropractic) **\$150.00** and Dr. Kyle Schneider (Detroit Shoreway) **\$150.00 to the doctor personally (all doctors are in needles)**

WD's must be faxed to Rebecca at (855) 267-9337 and an email sent to the billing ladies

franklind@csgonline.net- Denise, she has TOLEDO, OLD TOWN

Colbenson@csgonline.net - Annette, she has SHAKER SQUARE, EAST BROAD, WEST BROAD, RAIDER, VALLEY SPINE and YOUNGSTOWN

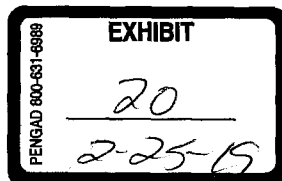
delattek@csgonline.net Katie, she has AKRON, VERNON PLACE/WERKMORE

bordelonk@csgonline.net Karla, she has WEST TUSC



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Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



WILLIAMS000570

From: **Brandy Brewer** brandy@knrlegal.com
 Subject: Insurance Issues on ASC Cases
 Date: September 4, 2014 at 4:13 PM
 To: PreLit Attorney PreLitAttorney@knrlegal.com, PreLit Support PreLitSupport@knrlegal.com
 Cc: Rob Nestico nestico@knrlegal.com, Jenna Wiley jwiley@knrlegal.com

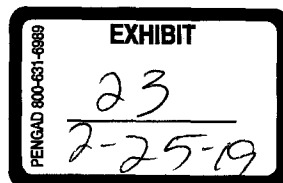


When there is an insurance issue or even a possibility of an insurance issues on ASC Cases, please send an email to akron2@csgonline.net and katie@managementservices4u.com with the information. This MUST be done.

Thank you.



Brandy Brewer
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WILLIAMS000559

From: **Rob Nestico** nestico@knrlegal.com
 Subject: Re: New Allstate request...
 Date: May 30, 2013 at 1:01 PM
 To: Joshua Angelotta jangelotta@knrlegal.com
 Cc: Ken Zerrusen zerrusen@knrlegal.com, Rob Horton rhorton@knrlegal.com, Attorneys Attorneys@knrlegal.com

RN

I agree we need to file all these Allstate files. Please send John and I a list of your Allstate Plambeck cases.

Sent from iPhone of Rob Nestico

On May 30, 2013, at 12:48 PM, "Joshua Angelotta" <jangelotta@knrlegal.com> wrote:

I think a lot of us made a deal with the devil by allowing them to have recorded statements because the result would usually be a workable offer. I'm inclined to stop doing this because now we're wasting our time, along with the client's time, and delaying the inevitable; which is filing suit on all of these claims.

Joshua R. Angelotta

Kisling, Nestico & Redick

Attorney At Law

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<image001.jpg><image002.jpg> <image003.jpg> <image004.jpg>

From: Ken Zerrusen
Sent: Thursday, May 30, 2013 12:44 PM
To: Joshua Angelotta; Rob Horton; Attorneys
Subject: RE: New Allstate request...

Me too.they have tightened the screws even more. I just got a pair of \$1500 offers on ER/Plambeck claims both having approx. 7k in bills

From: Joshua Angelotta
Sent: Thursday, May 30, 2013 12:40 PM
To: Rob Horton; Attorneys
Subject: RE: New Allstate request...

I'm getting unusually low Allstate offers on Plambeck cases. Allstate has obviously always made lousy offers with MIST claims. These new offers are really bad even on moderate-heavy impact collisions.

Joshua R. Angelotta

Kisling, Nestico & Redick

Attorney At Law

3412 W. Market St., Akron, Ohio 44333

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown

<image001.jpg><image002.jpg> <image003.jpg> <image004.jpg>

From: Rob Horton
Sent: Thursday, May 30, 2013 12:34 PM
To: Attorneys
Subject: New Allstate request



WILLIAMS000589

Subject: New Allstate Request...

David Stephas from Allstate just requested ³consent for deposition of doctor, all xray films, and all paperwork signed by the client from the chiro² on a third party claim. Said it is their new prelit procedure

It is an Akron Square case

Regards,

<image005.jpg>

Robert P. Horton

Kisling, Nestico & Redick

Attorney At Law

3412 W. Market St., Akron, Ohio 44333

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Locations: Akron, <image001.jpg><image002.jpg> <image003.jpg> <image004.jpg>

Canton, Cleveland,

Cincinnati,

Columbus, Dayton,

Toledo &

Youngstown



WILLIAMS000590



Brandy Brewer
 Kisling, Nestico & Redick
 Director of Operations
 3412 W. Market St., Akron, Ohio 44333
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Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo &
 Youngstown



From: Rob Horton
 Sent: Thursday, September 25, 2014 3:36 PM
 To: Jenna Wiley; Brandy Brewer; Erika Lovejoy
 Subject: RE:

Ding ding ding.

Regards,



Robert P. Horton, Esq.
 Kisling, Nestico & Redick
 Attorney at Law
 3412 W. Market St., Akron, Ohio 44333
 Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

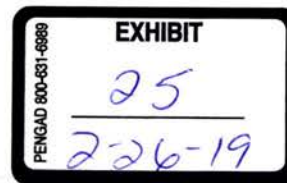
Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo &
 Youngstown



From: Jenna Wiley
 Sent: Thursday, September 25, 2014 3:34 PM
 To: Brandy Brewer; Rob Horton; Erika Lovejoy
 Subject: RE:

If I remember correctly,

Horton, please chime in if I am misremembering



Please write up for WD then. Thank you. And soon, there's no sense in wasting any additional time on this. Cawley has a \$3k bill on this case.



Brandy Brewer

Kisling, Nestico & Redick

Director of Operations

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*Locations: Akron, Canton, Cleveland,
Cincinnati, Columbus, Dayton, Toledo &
Youngstown*



From: Rob Horton

Sent: Thursday, September 25, 2014 3:37 PM

To: Brandy Brewer; Jenna Wiley; Erika Lovejoy

Subject: RE: !

Withdraw.

Regards,



Robert P. Horton, Esq.

Kisling, Nestico & Redick

Attorney at Law

3412 W. Market St., Akron, Ohio 44333

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*Locations: Akron, Canton, Cleveland,
Cincinnati, Columbus, Dayton, Toledo &
Youngstown*



From: Brandy Brewer

Sent: Thursday, September 25, 2014 3:37 PM

To: Rob Horton; Jenna Wiley; Erika Lovejoy

Subject: RE:

Ok, this isn't an excuse for the file to sit for 3 MONTHS. What is the plan?

From: Brandy Brewer <brandy@knrlegal.com>
Sent: Thursday, September 25, 2014 3:42 PM
To: Rob Horton; Jenna Wiley; Erika Lovejoy
Subject: RE: '

133 cases from him just this year. I am not going to tell him anything. We need to do our job and get off the case and not let it sit any longer.



Brandy Brewer
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*Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo &
 Youngstown*



From: Rob Horton
Sent: Thursday, September 25, 2014 3:40 PM
To: Brandy Brewer; Jenna Wiley; Erika Lovejoy
Subject: RE:

Tell him he should That would be great.

Regards,



Robert P. Horton, Esq.
 Kisling, Nestico & Redick
 Attorney at Law
 3412 W. Market St., Akron, Ohio 44333
 Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

*Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo &
 Youngstown*



From: Brandy Brewer
Sent: Thursday, September 25, 2014 3:38 PM
To: Rob Horton; Jenna Wiley; Erika Lovejoy
Subject: RE:

Brandy R. Gobrogge

From: Rob Nestico
Sent: Thursday, October 16, 2014 2:41 PM
To: Kelly Phillips
Cc: Paul W. Steele; John Reagan; Brandy Brewer
Subject: Re: Clearwater

No the e-mail was well received and like I said good to know what is being said but don't let them push you or your clients around with a bunch of BS. If you run into those problems this is why we have a litigation department. Sue them EVERY TIME!!!!

Sent from Attorney Rob Nestico

On Oct 16, 2014, at 1:56 PM, Kelly Phillips <Kphillips@knrlegal.com> wrote:

Well clearly my e-mail was not received in the manner it was intended. You have my apologies for that. Was just trying to let you know what I was seeing. Lesson learned. Have a great afternoon!

Kelly Phillips

Kisling, Nestico & Redick

<image001.jpg>

Attorney

2550 Corporate Exchange Drive, Columbus, Ohio 43231

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron,

Canton,

Cleveland,

Cincinnati,

Columbus,

Dayton, Toledo &

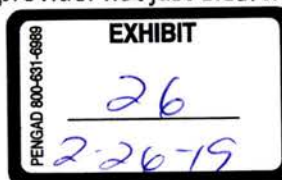
Youngstown

<image002.gif><image003.png><image004.gif><image005.gif><image006.png>

From: Rob Nestico
Sent: Thursday, October 16, 2014 1:48 PM
To: Kelly Phillips; Paul W. Steele
Cc: John Reagan; Brandy Brewer
Subject: RE: Clearwater

Kelly:

I appreciate the concern but we have considered this issue. I am glad you are thinking about these issues however, that is all the defense perspective. Are we not considering our client's interest when they have signed an LOP and could get sued by Clearwater or Dryfuss, or any other dr the ins. Co. does not agree with their bill? Are we not negotiating with EVERY provider not just Clearwater to help the



client and us get paid. Clearwater is treated no differently than any other provider we deal with that has an LOP.

If it wasn't for MD's willing to do this work who would care for these victims? The Ins. Co. would just find some other excuse not to pay bills and increase their bottom line.

I have taken down Nationwide before and we will do it again if necessary. [REDACTED]

In fact, ask yourself why ALL of these companies have paid the Dr either directly his full bill when there is no lawyer or MP has paid us his bill and others in full, but yet on a 3rd party case they raise this BS.

You need to argue the necessity of the treatment and the Dr's credentials, the facts of your case. You were hired to be an ADVOCATE not a puppet for the insurance company. Any discussion of not considering a Dr's bill will result in litigation even if that means EVERY nationwide case. These are MY directives.

You can't fear them and anytime they want to bring litigation my way I will be happy to take that task on.

Ask yourself these questions and ask any of the litigators in your office when have these bills not been awarded by Jurors. If your case is good on facts i.e. impact ,ER, Chiro and MD with a good witness then we litigate the case. PERIOD.

Rest assured you are not the first person to come from the Insurance Defense side, including myself and John Reagan to mention a few. As discussed in our interview you can either make the mental shift or you can't and that is left to be seen. I and plenty of others have made the shift and realize how poorly Insurance Companies as a whole treat people. Anything to increase their bottom line they will say. Speak to Carla Cornicelli in our office, former HEAD of ALLSTATE SIU or Jimmylee Hoover also from Allstate.

A bigger question you should ask your self is, are these people all lying? Are the ER Dr's lying, chiro's lying, Medical Dr's lying, and are we lying? If you answer an of these questions YES then you need to reconsider your choice of employment.

I hope this answers your questions and if not we can discuss this further.

Alberto R. Nestico
 Klisling, Nestico & Redick
 Attorney
 3412 W. Market St., Akron, Ohio 44333
 Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007
 Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo &
 Youngstown

<image002.gif><image003.png><Image004.gif>

<image008.jpg><Image009.jpg> <Image010.png>

From: Kelly Phillips
Sent: Thursday, October 16, 2014 12:53 PM
To: Rob Nestico; Paul W. Steele
Subject: Clearwater

Gentlemen,

Please know that I am not questioning what is going on here, nor am I trying to overstep my bounds. I fully understand my place in the organization. This e-mail is for informational purposes only.

I am now 5 for my last 5 with Nationwide cases where they are flat out refusing to consider anything related to Clearwater. At least when Progressive refuses, they offset with generosity in the general damages. Nationwide is not. Basically, I was told that if I am going to file on the case I was discussing then I better be prepared to file a whole lot of lawsuits. Clearly the Nationwide adjusters have received some form of a directive.

This brings about some concern. In some cases, it makes settlement a near financial impossibility. At the very least, it is taking money out of our client's pocket, and ours. I am a bit concerned with the ethical dilemma this creates. It is not difficult to make an argument that we are treating Clearwater's interests as equal to our clients. If we get a savvy client, we could find ourselves in some trouble. We are playing awful close to the fire. This is especially true when you factor in what Grange is trying to accomplish. Don't make the mistake of assuming that Nationwide and Grange are not in a coordinated effort, or at least having discussions regarding their individual approaches. On the insurance side, I was intimately involved in a coordinated effort to take down a large KY Chiropractic Operation and the firms that were heavily involved with said operation. FYI, Atty. Rob Roby played a bit of a role as well. His role was large enough that he was at least able to garner a blueprint as to how to attack such an operation. It is kind of like a "Raptor" approach....One works the head while the other works the body.

In my experience, when you are running an organization that continues to grow at unprecedented rates, you must regularly stop and take stock in what is happening around you. I am not suggesting that you are not. I am simply saying that given my experience, I am seeing some things that are bringing about concern.

Let me make myself clear, I am a member of your team. I am simply trying to protect you. That is the only reason I am bringing this to your attention. I can only assume you hired me largely because of my Insurance/SIU experience. I am simply trying to convey some of my concerns based on that experience.

Please feel free to disregard this e-mail if you'd like, or call should you want to discuss further.

Respectfully,

Kelly Phillips

Kisling, Nestico & Redick

<image001.jpg>

Attorney

2550 Corporate Exchange Drive, Columbus, Ohio 43231

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron,

Canton,

<Image002.gif><image003.png><image004.gif><image005.gif><image

*Cleveland,
Cincinnati,
Columbus,
Dayton, Toledo &
Youngstown*

Send them but NOT on letterhead if you have too for town & country
Sent from iPhone of Rob Nestico

On Nov 9, 2012, at 9:22 AM, "Megan Jennings" <mjennings@knrlegal.com> wrote:

Town & Country also has us send them our LOP's for clients

From: Nomiki Tsarnas
Sent: Friday, November 09, 2012 9:21 AM
To: Rob Nestico
Cc: Brandy Brewer; Staff
Subject: RE: LOP's

What about for CNS and Ohio Sports and Spine (Dr. Dunne). They have us create LOP's.

From: Rob Nestico
Sent: Friday, November 09, 2012 9:20 AM
To: Nomiki Tsarnas
Cc: Brandy Brewer; Staff
Subject: Re: LOP's

No provider sends them to u

Sent from iPhone of Rob Nestico

On Nov 9, 2012, at 9:14 AM, "Nomiki Tsarnas" <Tsarnas@knrlegal.com> wrote:

Is someone going to create a new LOP? The current medical assignment comes up on our letterhead.

From: Brandy Brewer
Sent: Friday, November 09, 2012 9:04 AM
To: Staff
Cc: Rob Nestico



GMP000047

Subject: LOP's
Importance: High

Absolutely NO LOP's should be sent out of this office on letterhead. Please see me if you have any questions.

<image001.jpg> Brandy Brewer

Kisling, Nestico & Redick

Executive Assistant to Attorney Nestico

3412 W. Market St., Akron, Ohio 44333

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

**Locations: Akron, <image002.jpg><image003.jpg><image004.jpg> <image005.jpg>
Canton,
Cleveland,
Cincinnati,
Columbus,
Dayton, Toledo &
Youngstown**

GMP000048

From: **Brandy Lamtman** brandy@knrlegal.com
 Subject: Chiropractor Referrals
 Date: May 6, 2013 at 6:14 PM
 To: Prelit Attorney PrelitAttorney@knrlegal.com
 Cc: Rob Nestico nestico@knrlegal.com

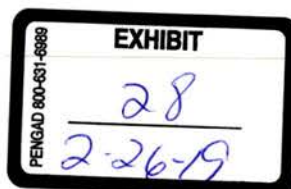


We MUST send an investigator to sign up clients!! We cannot refer to Chiro and have them sign forms there. This is why we have investigators. We are losing too many cases doing this!!!!!!

If a client is already at the chiro's office then of course it is ok. Other than that send an investigator.

No faxing or emailing forms unless it is approved by Rob, Robert or I.

Sent from my iPhone



WILLIAMS000001

10/20/2017

Sign Ups

Sign Ups

Holly Tusko

Sent: Tuesday, June 10, 2014 10:26 AM
To: Wes Steele; Paul Hillenbrand; Tom [tfish878@insight.rr.com]; David French; Gary Monto; JUDANJUDO@aol.com; James Smith; Dennis Rees; Gary Krebs; Glenn Jones; Aaron Czeti; Mike Simpson; Chuck DeRemer
Cc: Predit Attorney; Brandy Brewer; Rob Nestico
Importance: High

Good Morning KNR Investigators. In an effort to get everyone on the same page please and to ensure that we are servicing our clients to be best of our ability please see the below criteria for doing sign ups. Please note that if this criteria is not met you will not be paid. When doing a sign up the following steps need to be taken...

- 1.) The subject line of your email should always contain the client(s) name
- 2.) The contingency fee agreement, patient authorization and proof of representation forms needs to be signed and dated as well as a discharge letter, if applicable. Keep in mind that we do have 1/3 and ¼ fee agreements as well as 1/3 and ¼ Spanish fee agreements. Should you need any of these emailed to you please let me know. The attorney will always advise you if we need ¼ fee agreements signed, otherwise it will always be 1/3
- 3.) Photo(s) of insurance cards
- 4.) Photo of client (from the chest up)
- 5.) Photo(s) of ANY visible injuries (cuts, red marks, bruises, scratches, stiches, braces, casts, etc)
- 6.) Photo(s) of the vehicle
- 7.) Photo of police report (we send out direct mailers so a lot of the time the client will have the police report there with them).

You can use the above numeric format to add to the body of your email when sending the forms. If for any reason these items are not available then just note it accordingly in the body of your email. Again, this must be done by all investigators for all sign ups.

Please contact me with any questions / concerns.

Best Regards,



Holly Tusko

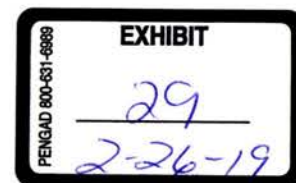
Kisling, Nestico & Redick

Intake Manager

3412 W. Market St., Akron, Ohio 44333

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Locations: Akron, Canton, Cleveland, Cincinnati,
Columbus, Dayton, Toledo & Youngstown



KNR03226

810000SNVITILM

Page 1 of 1

15 Auto (427 so far for October)
1 Other

Table with columns for dates (10/17/14), names (Lisa / Amanda, Wes Steele, etc.), amounts (\$50, \$100), and locations (Red Bag Columbus, etc.).

Holly Tusko
Kisling, Nasticco & Redick
Trustee Manager
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Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



610000SIVVITIM

8 Auto (435 so far for October)

10/18/14	10/18/14	A	Heather / Paul	Wes Steele \$50	Col Inj East
10/18/14	10/18/14	A	Marti / Robert	AMC \$50	TV-Akron / Cleveland
10/18/14	10/18/14	A	Marti / Robert	AMC \$50	TV-Akron / Cleveland
10/18/14	10/18/14	A	Lorenz / Tom	Jeff Allen \$50	Direct Ytown
10/18/14	10/18/14	A	Nicole / Devin	MRS \$50	Devin O
10/18/14	10/18/14	A	Courtney / Josh	AMC \$50	Direct Cleveland
10/18/14	10/18/14	A	Heather / Paul	Hillenbrand \$100	
10/18/14	10/18/14	A	Heather / Paul	Hillenbrand \$50	



Holly Tusko
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Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo
 & Youngstown



WILLIAMSON020000020

37 Auto (471.50 far for October) 1 Dog

10/20/14	10/20/14	A	Courtney / Josh	Wes Steele \$100	YP	
10/16/14	10/16/14	A	Bre / Rob H	MRS \$90	Crossroads Chiro	
10/20/14	10/20/14	A	Lorene / Tom	MRS \$50	Direct Ytown	
10/20/14	10/20/14	A	Courtney / Josh	AMC \$50	Akron Square	
10/20/14	10/20/14	A	Nicole / Devin	MRS \$50	Timber Spine	
10/20/14	10/20/14	A	Lindsay / Brian	Wes Steele \$50	Whitehall Inj	
10/20/14	10/20/14	A	Mallory / Kelly	Hillenbrand \$50	Town & Country	
10/20/14	10/20/14	A	Matt / Josh	MRS \$50	Google	OBJ
10/20/14	10/20/14	A	Courtney / Josh	MRS \$50	Accident Inj	
10/20/14	10/20/14	A	Courtney / Josh	AMC \$50	Akron Square	Comp to
10/20/14	10/20/14	A	Jackie / Jason	MRS \$50	Akron Square	
10/20/14	10/20/14	A	Jackie / Jason	MRS \$50	Akron Square	
10/20/14	10/20/14	A	Jackie / Jason	MRS \$50	Akron Square	
10/20/14	10/20/14	A	Courtney / Josh	AMC \$50	Parma Chiro	
10/20/14	10/20/14	A	Matt / Tom	MRS \$50	DM 06/02/2014 Ytown Red Bag	OBJ
10/20/14	10/20/14	A	Courtney / Josh	MRS \$50	Web Page	
10/20/14	10/20/14	A	Lisa / Amanda	Hillenbrand \$100	Red Bag Columbus	
10/20/14	10/20/14	A	Lisa / Amanda	Wes Steele \$50	Town & Country	Comp to
10/20/14	10/20/14	A	Marti / Robert	MRS \$50	Friend-Unknown	
10/20/14	10/20/14	A	Marti / Robert	MRS \$50	Friend-Unknown	
10/20/14	10/20/14	A	Marti / Robert	MRS \$50	Friend-Unknown	
10/20/14	10/20/14	A	Nicole / Devin	Gary Marro \$100	TV- Toledo	
10/20/14	10/20/14	A	Nicole / Devin	Gary Marro \$100	TV- Toledo	
10/20/14	10/20/14	A	Mallory / Kelly	Wes Steele \$50	Whitehall Inj	
10/20/14	10/20/14	A	Courtney / Josh	AMC \$50	Akron Square	
10/20/14	10/20/14	A	Courtney / Josh	MRS \$50	Akron Square	
10/20/14	10/20/14	A	Jackie / Jason	MRS \$50	Akron Square	Comp to
10/20/14	10/20/14	A	Paige / Ken	AMC \$50	Atlantic Chiro	
10/20/14	10/20/14	A	Paige / Ken	AMC \$50	Atlantic Chiro	
10/20/14	10/20/14	A	Marti / Robert	AMC \$50	Xcell Chiro	
10/20/14	10/20/14	A	Mallory / Kelly	Wes Steele \$50	TV-Columbus	
10/20/14	10/20/14	A	Lindsay / Brian	Wes Steele \$50	DM 09/29/2014 Franklin	
10/20/14	10/20/14	A	Mallory / Kelly	Wes Steele \$50	Old Town Chiro	
10/20/14	10/20/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/20/14	10/20/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/20/14	10/20/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/20/14	10/20/14	A	Courtney / Josh	AMC \$50	YP	
10/20/14	10/20/14	DOG	Courtney / Josh	Hillenbrand \$100	TV-Columbus	



Holly Tusko

Kailing, Nestica & Bealick

Invoice Manager

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Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



10000SMWTHM

Page 1 of 1

31 Auto (503 so far for October)

10/21/14	10/21/14	A	Lindsay / Brian	Wes Steele \$50	Direct Columbus	
10/21/14	10/21/14	A	Courtney / Josh	Wes Steele \$100	Red Bag Columbus	COMB DEF
10/21/14	10/21/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/21/14	10/21/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/21/14	10/21/14	A	Mallory / Kelly	Hillenbrand \$50	Town & Country	
10/21/14	10/21/14	A	Lindsay / Brian	Hillenbrand \$50	Town & Country	
10/21/14	10/21/14	A	Bre / Rob H	AMC \$50	Shaker Blvd	
10/21/14	10/21/14	A	Bre / Rob H	AMC \$50	Shaker Blvd	
10/21/14	10/21/14	A	Lindsay / Brian	Wes Steele \$50	Col Inj - North	Comp to
10/21/14	10/21/14	A	Lindsay / Brian	Wes Steele \$50	Col Inj - North	Comp to
10/21/14	10/21/14	A	Lorene / Tom	AMC \$50		
10/21/14	10/21/14	A	Lorene / Tom	Jeff Allen \$75	Red Bag Ytown	
10/21/14	10/21/14	A	Paige / Ken	MBS \$50		
10/21/14	10/21/14	A	Nicole / Devin	Dave French \$100	YP	
10/21/14	10/21/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/21/14	10/21/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Inj	
10/21/14	10/21/14	A	Mallory / Kelly	Wes Steele \$50	Town & Country	
10/21/14	10/21/14	A	Bre / Rob H	AMC \$50	Red Bag Summit	
10/21/14	10/21/14	A	Nicole / Devin	MBS \$50	Akron Square	
10/21/14	10/21/14	A	Nicole / Devin	MBS \$50	Canton Inj	
10/21/14	10/21/14	A	Jackie / Jason	AMC \$50		
10/21/14	10/21/14	A	Jackie / Jason	AMC \$50		
10/21/14	10/21/14	A	Jackie / Jason	AMC \$50		
10/21/14	10/21/14	A	Lisa / Amanda	Wes Steele \$50	Town & Country	
10/21/14	10/21/14	A	Lindsay / Brian	Wes Steele \$50	Town & Country	
10/21/14	10/21/14	A	Lindsay / Brian	Wes Steele \$50	Town & Country	
10/21/14	10/21/14	A	Lindsay / Brian	Wes Steele \$50	Town & Country	
10/21/14	10/21/14	A	Lorene / Tom	Jeff Allen \$75		
10/21/14	10/21/14	A	Lorene / Tom	Jeff Allen \$25		
10/21/14	10/21/14	A	Lindsay / Brian	Hillenbrand \$100	DM 08/25/2014 Franklin	
10/21/14	10/21/14	A	Courtney / Josh	AMC \$50	Euclid Physical Medicine	

Holly Tusko
 Kistling, Nestico & Redick
 Trustee Manager
 3412 W. Market St., Akron, Ohio 44333
 Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

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 Z2E3D00

Locations: Akron, Canton, Cleveland,
 Cincinnati, Columbus, Dayton, Toledo
 & Youngstown



WILLIAMS00022

37 Auto (599 so far for October)

10/24/14	10/24/14	10/24/14	A	Jackie / Jason	MRS \$50				
10/24/14	10/24/14	10/24/14	A	Paige / Ken	Glenn Jones \$100	YP			
10/24/14	10/24/14	10/24/14	A	Paige / Ken	Glenn Jones \$50	YP			
10/24/14	10/24/14	10/24/14	A	Paige / Ken	Glenn Jones \$50	YP			
10/24/14	10/24/14	10/24/14	A	Bre / Rob H	MRS \$50	Red Bag Portage			
10/24/14	10/24/14	10/24/14	A	Jackie / Jason	AMC \$50	Timber Spine & Rehab			
10/24/14	10/24/14	10/24/14	A	Lisa / Amanda	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Mallory / Kelly	Wes Steele \$50	West Broad Spine & Rehab			
10/24/14	10/24/14	10/24/14	A	Lisa / Amanda	Wes Steele \$50	Town & Country Chiropractic			
10/24/14	10/24/14	10/24/14	A	Nicole / Devin	Jeff Allen \$75	Red Bag Youngstown			
10/24/14	10/24/14	10/24/14	A	Nicole / Devin	Jeff Allen \$25	Red Bag Youngstown			
10/24/14	10/24/14	10/24/14	A	Nicole / Devin	Jeff Allen \$25	Red Bag Youngstown			
10/24/14	10/24/14	10/24/14	A	Hearthier / Paul	Paul Hillenbrand \$50	Town & Country Chiropractic			
10/24/14	10/24/14	10/24/14	A	Hearthier / Paul	Paul Hillenbrand \$100	Town & Country Chiropractic			
10/24/14	10/24/14	10/24/14	A	Courtney / Josh	AMC \$50	TV-Akron/Cleveland			
10/24/14	10/24/14	10/24/14	A	Lisa / Amanda	Wes Steele \$50	Town & Country Chiropractic			
10/24/14	10/24/14	10/24/14	A	Lisa / Amanda	Wes Steele \$50	Town & Country Chiropractic			
10/24/14	10/24/14	10/24/14	A	Jackie / Jason	AMC \$50	Core Chiropractic & Rehab			
10/24/14	10/24/14	10/24/14	A	Courtney / Josh	AMC \$50				
10/24/14	10/24/14	10/24/14	A	Lorene / Tom	Jeff Allen	Friend-Unknown			Comp to
10/24/14	10/24/14	10/24/14	A	Lorene / Tom	Jeff Allen	Friend-Unknown			
10/24/14	10/24/14	10/24/14	A	Lorene / Tom	Jeff Allen	Friend-Unknown			
10/24/14	10/24/14	10/24/14	A	Courtney / Josh	MRS \$50	Word of Mouth			
10/24/14	10/24/14	10/24/14	A	Courtney / Josh	MRS \$50	Word of Mouth			
10/24/14	10/24/14	10/24/14	A	Mallory / Kelly	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Mallory / Kelly	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Jackie / Jason	AMC \$50	United Accident Injury Center			
10/24/14	10/24/14	10/24/14	A	Jackie / Jason	AMC \$50	United Accident Injury Center			
10/24/14	10/24/14	10/24/14	A	Lorene / Tom	MRS \$50	United Accident Injury Center			
10/24/14	10/24/14	10/24/14	A	Paige / Ken	MRS \$50	Friend-Unknown			
10/24/14	10/24/14	10/24/14	A	Nicole / Devin	Jeff Allen \$75	Red Bag Youngstown			Comp to
10/24/14	10/24/14	10/24/14	A	Courtney / Josh	AMC \$50	Timber Spine & Rehab			
10/24/14	10/24/14	10/24/14	A	Lindsay / Brian	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Lindsay / Brian	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Lindsay / Brian	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Lindsay / Brian	Wes Steele \$50	Whitehall Injury Center			
10/24/14	10/24/14	10/24/14	A	Paige / Ken	AMC \$50				

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Locations: Akron, Canton, Cleveland,
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WILLIAMS00023

11 Auto (610 so far for October)

	10/25/14	10/25/14	A	Marti / Robert	MRS \$50	Columbus Injury & Rehab
	10/25/14	10/25/14	A	Marti / Robert	MRS \$50	Columbus Injury & Rehab
	10/25/14	10/25/14	A	Marti / Robert	MRS \$50	Columbus Injury & Rehab
	10/25/14	10/25/14	A	Bre / Rob H	AMC \$50	TV-Akron/Cleveland
	10/25/14	10/25/14	A	Courtney / Josh	MRS \$50	yp
	10/25/14	10/25/14	A	Jackie / Jason	Hillenbrand \$100	TV-Columbus
	10/25/14	10/25/14	A	Mallory / Kelly	Hillenbrand \$100	TV-Columbus
	10/25/14	10/25/14	A	Lindsay / Brian	Hillenbrand \$100	Direct Columbus
	10/25/14	10/25/14	A	Lisa / Amanda	Wes Steele \$50	
	10/25/14	10/25/04	A	Lisa / Amanda	Wes Steele \$50	
	10/25/14	10/25/14	A	Heather / Paul	Hillenbrand \$100	Red Bag Columbus



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WILLIAMS000024

27 Auto [386 so far for October]

10/15/14	10/15/14	A	Lisa / Amanda	Wes Steele \$50					
10/15/14	10/15/14	A	Lisa / Amanda	Wes Steele \$50					
10/15/14	10/15/14	A	Lisa / Amanda	Wes Steele \$50					
10/15/14	10/15/14	A	Bre / Rob H	AMC \$50			West Brood Chiro		
10/15/14	10/15/14	A	Heather / Paul	MRS \$50			Timber Spine		
10/15/14	10/15/14	A	Nicole / Devin	Hillenbrand \$100			DM 10/06/2014 Franklin Red Bag		
10/15/14	10/15/14	A	Marti / Robert	MRS \$50			DM 10/06/2014 Akron		Comp to
10/15/14	10/15/14	A	Jackie / Jason	MRS \$50			North Star Ortho		
10/15/14	10/15/14	A	Lorene / Tom	Jeff Allen \$50			yp		
10/15/14	10/15/14	A	Jackie / Jason	AMC \$50			yp		
10/15/14	10/15/14	A	Majan / Keith	AMC \$50					Only wants Keith as attorney
10/15/14	10/15/14	A	Courtney / Josh	AMC \$50					
10/15/14	10/15/14	A	Lindsay / Brian	Wes Steele \$50			Shaker Blvd		
10/15/14	10/15/14	A	Mallory / Kelly	Hillenbrand \$50			Whitehall Inj		
10/15/14	10/15/14	A	Heather / Paul	Wes Steele \$50			East Broad		
10/15/14	10/15/14	A	Lindsay / Brian	Hillenbrand \$100			Whitehall Inj		
10/15/14	10/15/14	A	Jackie / Jason	MRS \$50			Red Bag Columbus		
10/15/14	10/15/14	A	Heather / Paul	Wes Steele \$50			Friend - Unknown		
10/15/14	10/15/14	A	Heather / Paul	Wes Steele \$50			Cal Inj & Rehab - West		
10/15/14	10/15/14	A	Courtney / Josh	MRS \$50					
10/15/14	10/15/14	A	Bre / Rob H	AMC \$50			DM 08/25/2014 Akron		
10/15/14	10/15/14	A	Bre / Rob H	MRS \$50			Toledo Inj		Comp to
10/15/14	10/15/14	A	Lindsay / Brian	Wes Steele \$50			Red Bag Stark		
10/15/14	10/15/14	A	Nicole / Devin	MRS \$50			Whitehall Inj		
10/15/14	10/15/14	A	Paige / Ken	AMC \$50			Akron Square		
10/15/14	10/15/14	A	Bre / Rob H	AMC \$50			Timber Spine		
10/15/14	10/15/14	A	Nicole / Devin	MRS \$50			Xcell		
10/15/14	10/15/14	A					Red Bag Stark		



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WILLIAMS000025

30 Auto (359 so far for October)
1 Knee

Date	Amount	Payee	Case No.	Case Name	Case Type	Case Description	Case Status	Case Location	Case Notes
10/14/14	\$100	Gary Kreba			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	Wes Steele			A				
10/14/14	\$100	Hillenbrand			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$50	Wes Steele			A				
10/14/14	\$50	Wes Steele			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$100	Hillenbrand			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$50	AMC \$50			A				
10/14/14	\$50	Wes Steele			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$100	Glenn Jones			A				
10/14/14	\$50	Wes Steele			A				
10/14/14	\$50	MRS \$50			A				
10/14/14	\$50	AMC \$50			A				

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Locations: Akron, Canton, Cleveland,
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WILLIAMS00026

35 Auto (687 so far for May)

5/30/14	5/30/14	A	Bobbie / Mark	MRS \$50	Werkmore Chiro	-
5/30/14	5/30/14	A	Paige / Ken	AMC \$50	Town & Country	-
5/30/14	5/30/14	A	Amy / Greg	Wes Steele \$50	Town & Country	-
5/30/14	5/30/14	A	Amy / Greg	Wes Steele \$50	Town & Country	-
5/30/14	5/30/14	A	Matt / Amanda	James Smith \$100	DM 05/26/2014 Cincy	OBJ -
5/30/14	5/30/14	A	Courtney / Jason	MRS \$50	DM 05/26/2014 Stark Red Bag	-
5/30/14	5/30/14	A	Jackie / Josh	AMC \$50	Akron Square	-
5/30/14	5/30/14	A	Lorene / Tom	Wes Steele \$50	Town & Country	comp to
5/30/14	5/30/14	A	Lorene / Tom	Wes Steele \$50	Town & Country	comp to
5/30/14	5/30/14	A	Courtney / Jason	James Smith \$100	DM 06/26/2014 Cincy	-
5/30/14	5/30/14	A	Amy / Greg	James Smith \$100	DM 05/26/2014 Cincy	-
5/30/14	5/30/14	A	Jackie / Josh	Jeff Allen \$75	Yawn Chiro	-
5/30/14	5/30/14	A	Courtney / Jason	AMC \$50	TV-Akron / Cleveland	-
5/30/14	5/30/14	A	Courtney / Jason	AMC \$50	TV-Akron / Cleveland	-
5/30/14	5/30/14	A	Jackie / Josh	MRS \$50	TV-Akron / Cleveland	-
5/30/14	5/30/14	A	Amy / Greg	Wes Steele \$50	Town & Country	-
5/30/14	5/30/14	A	Nicole / Devin	AMC \$50	DM 05/26/2014 Akron Red Bag	-
5/30/14	5/30/14	A	Amy / Greg	Wes Steele \$50	Town & Country	-
5/30/14	5/30/14	A	Courtney / Jason	AMC \$50	DM 05/19/2014 Akron Red Bag	-
5/30/14	5/30/14	A	Paige / Ken	MRS \$50	TV-Akron / Cleveland	-
5/30/14	5/30/14	A	Paige / Ken	AMC \$50	Care Chiro	-
5/30/14	5/30/14	A	Heather / Paul	Wes Steele \$50	Town & Country	-
5/30/14	5/30/14	A	Amy / Greg	Wes Steele \$50	DM 05/26/2014 Franklin Red Bag	-
5/30/14	5/30/14	A	Nicole / Devin	MRS \$50	DM 03/17/2014	-
5/30/14	5/30/14	A	Jimmy / Robert	MRS \$50	Friend - Unknown	-
5/30/14	5/30/14	A	Heather / Paul	Wes Steele \$50	TV-Columbus	-
5/30/14	5/30/14	A	Heather / Paul	Wes Steele \$50	TV-Columbus	-
5/30/14	5/30/14	A	Bobbie / Mark	AMC \$50	Canton Inj	-
5/30/14	5/30/14	A	Bobbie / Mark	AMC \$50	Canton Inj	-
5/30/14	5/30/14	A	Jimmy / Robert	Dave French \$100	DM 04/14/2014 Toledo	-
5/30/14	5/30/14	A	Jackie / Josh	AMC \$50	DM 05/26/2014 Akron Red Bag	-
5/30/14	5/30/14	A	Paige / Ken	MRS \$50	Sycamore Spine	-
5/30/14	5/30/14	A	Paige / Ken	MRS \$50	Sycamore Spine	-
5/30/14	5/30/14	A	Jimmy / Robert	MRS \$50	Detroit Shoreway	-
5/30/14	5/30/14	A	Jimmy / Robert	MRS \$50	Detroit Shoreway	-

Holly Tusko

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WILLIAMS00027

40 Auto (630 so far for May) 1 5/F

5/27/14	5/27/14	A	Jimmy / Robert Courtney / Jason	Jeff Allen \$100	YP	
5/27/14	5/27/14	A	Amy / Greg	MRS \$50		
5/28/14	5/28/14	A	Amy / Greg	Wes Steele \$50		
5/28/14	5/28/14	A	Courtney / Jason	Wes Steele \$50		
5/28/14	5/28/14	A	Courtney / Jason	MRS \$50	North Coast Inj & Spine Akron Square	
5/28/14	5/28/14	A	Heather / Paul	Wes Steele \$50	Town & Country	
5/27/14	5/27/14	A	Courtney / Jason	MRS \$50	TV-Akron/Cleveland	
5/28/14	5/28/14	A	Courtney / Jason	AMC \$50	TV-Akron/Cleveland	Comp to
5/28/14	5/28/14	A	Bobbie / Mark	AMC \$50	DM 01/20/2014 Akron #1	
5/28/14	5/28/14	A	Bobbie / Mark	MRS \$50	Toledo Inj	
5/28/14	5/28/14	A	Bobbie / Mark	MRS \$50	TV-Ytown	
5/28/14	5/28/14	A	Paige / Ken	AMC \$50	Shaker Square	
5/28/14	5/28/14	A	Felipe / Amanda	Wes Steele \$50	Town & Country	OBJ -
5/28/14	5/28/14	A	Felipe / Amanda	N/A	Town & Country	Not OBJ -
5/28/14	5/28/14	A	Bobbie / Mark	Jeff Allen \$75	DM 05/19/2014 Ytown Red Bag	
5/28/14	5/28/14	A	Paige / Ken	MRS \$50	Akron Square	Comp to Ref by
5/28/14	5/28/14	A	Courtney / Jason	AMC \$50		
5/28/14	5/28/14	A	Jimmy / Robert	MRS \$50		
5/28/14	5/28/14	A	Heather / Paul	MRS \$50		
5/28/14	5/28/14	A	Courtney / Jason	AMC \$50	Akron Inj Center	COMMERCIAL DEF
5/28/14	5/28/14	A	Paige / Ken	Gary Monto \$100		
5/28/14	5/28/14	A	Paige / Ken	Gary Monto \$50	DM 05/19/2014 Toledo	
5/28/14	5/28/14	A	Matt / Ken	Gary Monto \$100	DM 05/19/2014 Toledo	
5/28/14	5/28/14	A	Bobbie / Mark	MRS \$50	DM 11/18/2013 Toledo #1	OBJ -
5/28/14	5/28/14	A	Paige / Ken	MRS \$50	YP	
5/28/14	5/28/14	A	Matt / Tom	MRS \$50	Akron Square	
5/28/14	5/28/14	A	Matt / Tom	AMC \$50	TV-Ytown	OBJ -
5/28/14	5/28/14	A	Jackie / Josh	MRS \$50	Shaker Square	OBJ -
5/28/14	5/28/14	A	Amy / Greg	Wes Steele \$50	TV-Columbus	
5/27/14	5/27/14	A	Paige / Ken	Wes Steele \$50	Town & Country	Comp to
5/28/14	5/28/14	A	Courtney / Jason	MRS \$50	Google Bus	
5/28/14	5/28/14	A	Courtney / Jason	MRS \$50	Bus	
5/28/14	5/28/14	A	Heather / Paul	Wes Steele \$50		
5/28/14	5/28/14	A	Heather / Paul	Wes Steele \$50		
5/28/14	5/28/14	A	Heather / Paul	Wes Steele \$50		
5/28/14	5/28/14	A	Amy / Greg	Wes Steele \$50		
5/28/14	5/28/14	A	Amy / Greg	Wes Steele \$50		
5/28/14	5/28/14	A	Courtney / Jason	Glenn Jones \$100		
5/28/14	5/28/14	SF	Jill / John	N/A		

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WILLIAMS000028

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Description
or:
Image
01/03/2014
4:38:10PM
50

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WILLIAMS00029

46 Auto (590 so far for May)

Date	Case No.	Case Name	Amount	Case Type	Case Status	Case Location	Case Description	Case Notes
5/27/14	5/27/14	Amy / Greg	Wes Steele \$50	A		Westgate		Comp to
5/27/14	5/27/14	Amy / Greg	Hillenbrand \$150	A		TV-Akron/Cleveland		
5/27/14	5/27/14	Jimmy / Robert	MRS \$50	A		TV-Akron/Cleveland		
5/27/14	5/27/14	Jimmy / Robert	MRS \$50	A		DM 05/12/2014 Ytown Red Bag		
5/27/14	5/27/14	Courtney / Jason	Jeff Allen \$25	A		DM 05/12/2014 Ytown Red Bag		
5/27/14	5/27/14	Courtney / Jason	Wes Steele \$50	A		Friend - Unknown		
5/27/14	5/27/14	Lacey / Amanda	Wes Steele \$50	A		Col Inj - North		
5/27/14	5/27/14	Amy / Greg	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Amy / Greg	Wes Steele \$50	A		DM 05/19/2014 Summit Red Bag		
5/27/14	5/27/14	Nicole / Devin	AMC \$50	A		Town & Country		
5/27/14	5/27/14	Amy / Greg	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Lacey / Amanda	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Lacey / Amanda	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Lacey / Amanda	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Heather / Paul	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Heather / Paul	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Heather / Paul	Wes Steele \$50	A		Town & Country		
5/23/14	5/23/14	Paige / Ken	AMC \$50	A		United Accident Inj		
5/27/14	5/27/14	Paige / Ken	MRS \$50	A		TV-Akron/Cleveland		
5/27/14	5/27/14	Matt / Tom	AMC \$50	A		Yanek Chiro		
5/27/14	5/27/14	Lorene / Tom	AMC \$50	A		Ytown Chiro		
5/27/14	5/27/14	Lorene / Tom	AMC \$50	A		Ytown Chiro		
5/27/14	5/27/14	Paige / Ken	MRS \$50	A				ref by
5/27/14	5/27/14	Jimmy / Robert	James Smith \$100	A		TV-Columbus		
5/27/14	5/27/14	Jimmy / Robert	James Smith \$50	A		TV-Columbus		
5/27/14	5/27/14	Courtney / Jason	James Smith \$100	A		Toledo Spine		Comp It
5/27/14	5/27/14	Bobbie / Mark	Gary Monto \$100	A				
5/27/14	5/27/14	Lacey / Amanda	Wes Steele \$50	A		DM 05/19/2014 Franklin		
5/27/14	5/27/14	Paige / Ken	AMC \$50	A		TV-Akron/Cleveland		
5/27/14	5/27/14	Courtney / Jason	Stephen Tobias \$100	A		DM 05/19/2014 Dayton		
5/27/14	5/27/14	Marti / Ken	AMC \$50	A				
5/27/14	5/27/14	Marti / Ken	AMC \$50	A				
5/27/14	5/27/14	Bobbie / Mark	James Smith \$100	A		DM 2014-Cincy		Signed at two separate locations / residences
5/27/14	5/27/14	Bobbie / Mark	James Smith \$100	A		DM 2014-Cincy		Signed at two separate locations / residences
5/27/14	5/27/14	Lorene / Tom	Jeff Allen \$75	A		DM 05/05/2014 Ytown Red Bag		
5/27/14	5/27/14	Courtney / Jason	AMC \$50	A		Akron Square		
5/27/14	5/27/14	Courtney / Jason	AMC \$50	A		Akron Square		
5/27/14	5/27/14	Jackie / Josh	AMC \$50	A				
5/27/14	5/27/14	Lacey / Amanda	Wes Steele \$50	A		Town & Country		
5/27/14	5/27/14	Courtney / Jason	Glenn Jones \$100	A		YP		
5/27/14	5/27/14	Jimmy / Robert	AMC \$50	A		TV-Akron/Cleveland		
5/27/14	5/27/14	Jimmy / Robert	Dave French \$100	A		TV-Toledo		
5/27/14	5/27/14	Jimmy / Robert	Dave French \$50	A		TV-Toledo		
5/27/14	5/27/14	Paige / Ken	MRS \$50	A		Google		

WILLIAMS000030

5/27/14	5/27/14	A	Bobbie / Mark	AMC \$50	TV-Akron/Cleveland	-
5/27/14	5/27/14	A	Bobbie / Mark	AMC \$50	TV-Akron/Cleveland	-

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WILLIAMS000031

33 Auto (474 so far for April)
1 Other

Table with columns: Date, Amount, Name, Location, etc. containing financial records for various individuals and locations.

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WILLIAMS000032

31 Auto (420 so far for April)
1 Dog
1 Other

Table with columns for dates (4/21/14), names (e.g., Jimmy / Robert), amounts (e.g., Gary Krebs \$100), and descriptions (e.g., DM 04/14/2014 Cincy). Includes various entries for different individuals and locations.

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Intake Manager
3412 W. Market St., Akron, Ohio 44333
Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007
Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



WILLIAMS00033

27 Auto (47 so far for April)
1 HIP

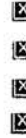
Table with columns for dates (4/2/14), names (Courtney / Jason, Bre / Rob H, Amy / Greg, etc.), amounts (AMC \$50, Wes Steele \$50, etc.), and locations (Akron Square, TV-Akron/Cleveland, etc.).



Holly Tusko
Kisling, Nestico & Redick
Intake Manager

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Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



WILLIAMS000034

28 Auto (234 so far for April)

4/10/14	4/10/14	A	Courtney / Jason	AMC \$50	Toledo Spire	-
4/10/14	4/10/14	A	Jackie / Josh	James Smith \$100	DM 04/07/2014 Cincy	-
4/10/14	4/10/14	A	Jackie / Josh	Gary Morro \$100	Toledo Spire	-
4/10/14	4/10/14	A	Jackie / Josh	Gary Morro \$50	Toledo Spire	-
4/10/14	4/10/14	A	Courtney / Jason	MRS \$50	Toledo Inj	-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50	F	-
4/10/14	4/10/14	A	Bre / Rob H	MRS \$50	Cone Chiro	-
4/10/14	4/10/14	A	Matt / Brian	AMC \$50	Xcell	-
4/10/14	4/10/14	A	Courtney / Jason	MRS \$50		-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50		-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50		-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50		-
4/10/14	4/10/14	A	Jackie / Josh	MRS \$50	Canton Inj	-
4/10/14	4/10/14	A	Jackie / Josh	MRS \$50	Canton Inj	-
4/10/14	4/10/14	A	Lacey / Amanda	Hillenbrand \$50	Town & Country	-
4/10/14	4/10/14	A	Courtney / Jason	MRS \$50	DM 04/07/2014 Akron Red Bag	-
4/10/14	4/10/14	A	Courtney / Jason	AMC \$50	Atlantic Chiro	-
4/10/14	4/10/14	A	Bre / Rob H	MRS \$50	Akron Square	-
4/10/14	4/10/14	A	Bre / Rob H	MRS \$50	Akron Square	-
4/10/14	4/10/14	A	Lonene / Tom	Jeff Allen \$50	Youngstown Chiro	-
4/10/14	4/10/14	A	Marti / Brian	AMC \$50	Rolling Acres	-
4/10/14	4/10/14	A	Marti / Brian	MRS \$50	Rolling Acres	-
4/10/14	4/10/14	A	Lacey / Amanda	Tom Fisher \$50	East Broad	-
4/10/14	4/10/14	A	Heather / Paul	Tom Fisher \$50	DM 04/07/2014 Franklin Red Bag	-
4/10/14	4/10/14	A	Heather / Paul	Tom Fisher \$25	DM 04/07/2014 Franklin Red Bag	-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50	Detroit Shoreway	-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50	Detroit Shoreway	-
4/10/14	4/10/14	A	Bre / Rob H	AMC \$50	Detroit Shoreway	-

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 Kistling, Nezirica & Redick
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Description
 001 002@
 001 002@
 4/30/08
 50

WILLIAMS000035

37 Auto (656 for March)

3/31/14	3/31/14	A	Heather / Paul	Wes Steele \$50	Town & Country Radio	Comp to
3/31/14	3/31/14	A	Marti / Brian	MRS \$50	Town & Country	Comp to
3/31/14	3/31/14	A	Lacey / Amanda	Wes Steele \$50	DM 03/10/2014 Akron	Comp to
3/31/14	3/31/14	A	Paige / Robert	AMC \$50		
3/31/14	3/31/14	A	Megan / Ken	MRS \$50		
3/31/14	3/31/14	A	Amy / Kristen	Wes Steele \$50	Town & Country	
3/31/14	3/31/14	A	Lacey / Amanda	MRS \$50		
3/31/14	3/31/14	A	Lorene / Tom	Tom Fisher \$100	DM 03/24/2014 Akron	
3/31/14	3/31/14	A	Paige / Robert	AMC \$50	YP	
3/31/14	3/31/14	A	Paige / Robert	Wes Steele \$50	Town & Country	
3/31/14	3/31/14	A	Lorene / Tom	AMC \$50		
3/31/14	3/31/14	A	Bre / Rob H	AMC \$50	DM 03/24/2014 Akron	
3/31/14	3/31/14	A	Megan / Ken	MRS \$50	Akron Square	
3/31/14	3/31/14	A	Heather / Paul	Wes Steele \$50	TV-Columbus	
3/31/14	3/31/14	A	Marti / Brian	MRS \$50	TV-Akron/Cleveland	
3/31/14	3/31/14	A	Megan / Ken	AMC \$50	TV-Akron/Cleveland	
3/31/14	3/31/14	A	Megan / Ken	AMC \$50	TV-Akron/Cleveland	
3/31/14	3/31/14	A	Megan / Ken	MRS \$50	NorthCoast Rehab	Comp to
3/31/14	3/31/14	A	Heather / Paul	Ayan Noor \$100	AcadHealth	
3/31/14	3/31/14	A	Marti / Brian	MRS \$50	Akron Square	
3/31/14	3/31/14	A	Marti / Brian	MRS \$50	Akron Square	
3/31/14	3/31/14	A	Marti / Brian	MRS \$50	Akron Square	
3/31/14	3/31/14	A	Heather / Paul	Wes Steele \$50	Town & Country	
3/31/14	3/31/14	A	Heather / Paul	Wes Steele \$50	Town & Country	
3/31/14	3/31/14	A	Megan / Ken	AMC \$50	DM 03/31/2014 Akron Red Bag	
3/31/14	3/31/14	A	Megan / Ken	MRS \$50	TV-Akron/Cleveland	
3/31/14	3/31/14	A	Marti / Brian	AMC \$50		
3/31/14	3/31/14	A	Amy/Greg	Wes Steele \$50		
3/31/14	3/31/14	A	Amy/Greg	Wes Steele \$50		
3/31/14	3/31/14	A	Jackie/Josh	Gary Morro \$100	All Star Chiro	
3/31/14	3/31/14	A	Jackie/Josh	AMC \$50	A Plus Treatment Center	
3/31/14	3/31/14	A	Courtney / Jason	AMC \$50	Akron Square	
3/31/14	3/31/14	A	Jackie/Josh	MRS \$50	TV-Akron/Cleveland	
3/31/14	3/31/14	A	Courtney / Jason	MRS \$50		
3/31/14	3/31/14	A	Courtney / Jason	MRS \$50		
3/31/14	3/31/14	A	Paige / Robert	MRS \$50	Shaker Square	

Holly Tusko

Kisling, Nestico & Redick
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WILLIAMS000036

30 Auto (518 so far for March)

3/28/14	3/28/14	A	Heather / Paul	Wes Steele \$50	Town & Country
3/28/14	3/28/14	A	Heather / Paul	Wes Steele \$50	Town & Country
3/28/14	3/28/14	A	Heather / Paul	Wes Steele \$50	Town & Country
3/28/14	3/28/14	A	Jackie / Josh	AMC \$50	DM 03/17/2014 Akron Red Bug
3/28/14	3/28/14	A	Heather / Paul	Wes Steele \$50	Web Page
3/28/14	3/28/14	A	Megan / Ken	Gary Monto \$100	DM 03/17/2014 Toledo
3/28/14	3/28/14	A	Megan / Ken	Gary Monto \$50	DM 03/17/2014 Toledo
3/28/14	3/28/14	A	Amy / Greg	Wes Steele \$50	Acu-Health
3/28/14	3/28/14	A	Amy / Greg	Wes Steele \$50	Acu-Health
3/28/14	3/28/14	A	Megan / Ken	MRS \$50	Toledo Inj
3/28/14	3/28/14	A	Jackie / Josh	MRS \$50	Carion Inj
3/28/14	3/28/14	A	Lacey / Amanda	Wes Steele \$50	Col Inj - West
3/28/14	3/28/14	A	Megan / Ken	MRS \$50	Akron Square
3/28/14	3/28/14	A	Jackie / Josh	MRS \$50	TV-Akron/Cleveland
3/28/14	3/28/14	A	Amy / Greg	Tom Fisher \$50	Town & Country
3/28/14	3/28/14	A	Lacey / Amanda	Tom Fisher \$50	Town & Country
3/28/14	3/28/14	A	Marti / Brian	MRS \$50	YP
3/28/14	3/28/14	A	Lorene / Tom	AMC \$50	DM ytown 01/06/2014 #1
3/28/14	3/28/14	A	Lorene / Tom	AMC \$50	DM ytown 01/06/2014 #1
3/28/14	3/28/14	A	Lorene / Tom	AMC \$50	DM ytown 01/06/2014 #1
3/28/14	3/28/14	A	Megan / Ken	MRS \$50	TV-Akron/Cleveland
3/28/14	3/28/14	A	Courtney / Jason	AMC \$50	
3/28/14	3/28/14	A	Amy / Greg	Wes Steele \$50	Town & Country
3/28/14	3/28/14	A	Bre / Rob H	AMC \$50	Akron Square
3/28/14	3/28/14	A	Amy / Greg	Wes Steele \$50	Town & Country
3/28/14	3/28/14	A	Megan / Ken	MRS \$50	
3/28/14	3/28/14	A	Megan / Ken	MRS \$50	
3/28/14	3/28/14	A	Megan / Ken	MRS \$50	
3/28/14	3/28/14	A	Amy / Greg	Wes Steele \$50	TV-Columbus
3/28/14	3/28/14	A	Amy / Greg	Wes Steele \$50	TV-Columbus



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← Breanna ▾

CALL MORE

B Fine 9:34 AM

Haha. I get everything second hand. Other former employees talk to current employees and fill me in. 9:34 AM

B The day you first texted me about this, Kevin the paralegal there told me their was a email about investigator fees sent that same day 11:47 AM

11:59 AM An internal email???

12:00 PM Or the emails I sent Paige giving them a hard time?

B I think so. Something went around about how they will only get the fee now if they actually go the the house or something. I don't remember exactly. 12:01 PM

B I don't know about that. 12:02 PM

12:20 PM They're so fucked.

📎 Enter message

EXHIBIT 31 2-26-19

😊 SEND

11/12/2017

Re: Suggested EMail to the staff

Re: Suggested EMail to the staff

Brandy Lamtman

Sent: Friday, December 07, 2012 3:54 PM

To: Robert Redick

Cc: Rob Nestico; Robert Redick

Agree

Sent from my iPhone

On Dec 7, 2012, at 3:33 PM, "Robert Redick" <redick@knrlegal.com> wrote:

Please be advised that if the attorney on the case requests any investigator – WHO IS NOT MIKE OR AARON – to do something for a case that has already been opened.

I.E. – Pick up records – knock on the door to verify address – they CAN be paid on a case by case basis depending on the task performed.

However, no checks for anything other than the SU fee should ever be requested without getting in-writing approval from the handling attorney, myself and/or Brandy.

Under no circumstances should any additional checks to MRS or AMC be requested other than at the time the case is set-up.

Please see me if you have any questions

I think we should send this to the staff today. There were only 5 for Aaron and 2 for Mike and they have been corrected but we need to make sure this does not happen Any more going forward.

<[image001.jpg](#)> Robert W. Redick
 Kisling, Nestico & Redick
 Attorney At Law
 3412 W. Market St., Akron, Ohio 44333
 Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007
 Locations: <[image002.jpg](#)><[image003.jpg](#)> <[image004.jpg](#)> <[image005.jpg](#)>
 Akron,
 Canton,
 Cleveland,
 Cincinnati,
 Columbus,
 Dayton,
 Toledo &
 Youngstown



Robert Horton

From: Paige Soulier [psoulier@knrlegal.com]
Sent: Wednesday, June 29, 2016 4:16 PM
To: Robert Horton
Cc: Ken Zerrusen
Subject: [REDACTED]

Hi Rob,

All is good ☺ Thanks – I just wanted to let you know that I have sent over everything that we have to date. If you need anything further, please contact Ken directly.

Thanks so much!

From: Robert Horton [mailto:rhorton@slaterzurz.com]
Sent: Wednesday, June 29, 2016 4:04 PM
To: Paige Soulier
Subject: [REDACTED]

Hi Paige,

Hope all is well. Getting ready to get things moving on this one, but still need the itemized invoice for the investigator fee that was included in the QM. Get that to me when you can, so I can honor the lien. When you send that over, please include the results of the investigation (e.g. scene and vehicle photographs, witness statements obtained by the investigator, etc.), as I do not see any of those things in the original and supplemented documentation that was sent over.

Thanks!

From: Paige Soulier [mailto:psoulier@knrlegal.com]
Sent: Thursday, April 21, 2016 2:07 PM
To: Robert Horton
Subject: [REDACTED]

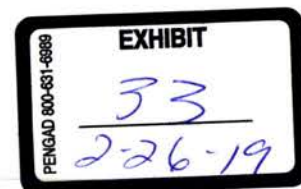
HI HORTON!!!

Hey I have attached all invoices that were paid. The only one I do not have is the investigator fee, which you KNOW exists. Let me know if you want the hard copies as well.

Hope all is well with you!



Paige Soulier | Paralegal
Kisling, Nestico & Redick
 3412 West Market St., Akron, OH 44333
 Main: 330-869-9007 | Fax: 330-869-9008
www.knrlegal.com | Outside Ohio: 800-978-9007



IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, Plaintiff, vs. KISLING, NESTICO & REDICK, LLC, <i>et al.</i> , Defendants.	Case No. CV-2016-09-3928 Judge Alison Breaux
AFFIDAVIT OF GARY PETTI	

I, Gary Petti, having been duly sworn, have personal knowledge of the following matters of fact, and testify as follows:

1. In March of 2012, I became employed as a prelitigation attorney with the law firm of Kisling, Nestico & Redick, LLC ("KNR") in Akron, Ohio. Before my employment with KNR, I had worked since 1997 as a personal-injury lawyer with the Akron-based law firm of Slater & Zurz, primarily on behalf of insurance companies on the defense side, and car-accident victims on the plaintiffs' side. I resigned from my position at Slater & Zurz to join KNR because my practice at Slater & Zurz required me to travel frequently to Columbus, Ohio, and the KNR position would allow me to remain closer to my home in Wadsworth, Ohio while my wife went back to school to obtain her degree as a nurse-anesthetist. My wife and I have three children, who, at the time, were ages 6, 10, and 13. When I left Slater & Zurz to join KNR, I took



approximately 200 cases with me, and continued to represent these clients through KNR.

2. While I was working for Slater & Zurz, I first learned that KNR paid kickbacks to certain chiropractors in the form of a "narrative fee." When I spoke with certain chiropractors from Plambeck-owned clinics who would occasionally refer me cases, they told me that KNR paid them a narrative-report fee every time the chiropractors referred a case to KNR, and asked if I would do the same. I told them that I would not. I did not understand at the time that this was KNR's firm-wide policy, as opposed to a practice followed by certain KNR attorneys, and when I went to work for KNR, I assumed that I would not be required to charge my clients for unnecessary narrative-fee expenses.

3. When I began working at KNR, I primarily worked on the cases that I had brought to the firm, and when I closed these cases, no narrative fee was charged to these clients because I never ordered narrative reports for them. It was always my understanding that the decision as to whether a narrative report is worthwhile in a case is the attorney's to make, upon consultation with the client. I always understood that narrative reports were only properly used to allow a medical professional to explain why the plaintiff's injuries were different or more challenging than they might appear from the contents of the medical records, and in doing so, provide information that was not included in the records.

4. As I began to work on cases from KNR that had been taken in and previously worked on by other KNR attorneys, I would see the narrative fee appear on the client's settlement statement. I assumed that these fees were for narrative reports that were ordered by the previous KNR attorney who worked on the case. I soon learned that these narrative reports ordered by KNR were very different from the narrative reports that I was accustomed to using, and were essentially worthless, containing no information that was not already apparent from the client's medical records. The narrative reports provided by Dr. Minas Floros of Akron Square

Chiropractic, a Plambeck-owned clinic in Akron, were especially bad, and the worst narrative reports I had ever seen. They appeared to follow a basic formula of a few sentences where Floros merely filled in the blanks with information that was readily apparent from the medical records. It was clear that virtually no time or effort could have been expended on his worthless narratives—certainly no effort remotely justifiable by the narrative fees being paid.

5. As I continued to work at KNR, and continued to close the cases that I brought to the firm, I began working on KNR cases that I had taken in while at the firm. On several occasions while I was working at KNR, I took calls from chiropractors from Plambeck-owned clinics who were present on the line with a patient that the chiropractors sought to refer to KNR.

6. In approximately mid-to-late November of 2012, my paralegal Megan Jennings began to collect a package of documentation on a case that was to be submitted to the defendant's insurance company, including police reports, and medical records. When she submitted this package to me for my approval, I noticed a charge for a narrative report in the documents. I immediately expressed my surprise and disapproval that the narrative fee would be included in this package, and asked Jennings why this was the case. I also told her that I am the lawyer, so I'm the one who gets to advise the client as to whether the narrative report is a justifiable expense. In response, Jennings informed me that narrative fees are paid on every case that comes in from Akron Square Chiropractic and other Plambeck-owned clinics, and that the check is made out to the chiropractor personally and sent directly to the chiropractor's house. I then told her that I would not approve of any such fees being charged to my clients without my express approval.

7. Within a few days, I was working with Jennings on another case that was affiliated with Akron Square Chiropractic. On November 28, 2012, I emailed Jennings about this case to instruct her that no narrative fee was to be paid on it. I wrote, "Remember, no reports from

doktor flooroos,” deliberately misspelling his name in an effort to defuse tension with humor. I also wrote, as a follow-up to our previous conversation, “I’ve asked a number of adjusters about the importance of those reports and the most common response is nearly uncontrolled laughter.” This comment, while hyperbolic, referred to the fact that on the occasions when I attempted to refer to Plambeck narrative-reports in negotiating settlements on behalf of KNR clients, the insurance adjusters paid absolutely no regard to these reports.

8. Within approximately two weeks of having sent this email to Jennings, KNR terminated my employment. I was told by KNR attorney John Regan that I was “not a good fit” there. I could not disagree and little else was said in the meeting. I understood that by stating that I was “not a good fit” at KNR, Regan was only referring to my unwillingness to participate in KNR’s schemes to defraud their clients, like with the narrative fees, as there were no other issues of which I was made aware. At that point, I was glad to leave KNR and the practice of law, and have since been working in the construction business.

9. During my time working at KNR, I became aware of the firm’s so-called investigators, including Aaron Czetli and Michael Simpson. I would often witness Czetli and Simpson performing odd jobs around KNR’s Akron office, such as stuffing envelopes and putting up holiday lights. Although I had ample opportunity to observe their activities, comings, goings, and work-product, I never witnessed or became aware of these so-called investigators performing any actual investigations. To my knowledge, their only involvement with client matters was to meet potential clients and sign them to KNR fee agreements.

10. Within a few months before KNR terminated my employment, KNR Managing Partner Rob Nestico criticized me in front of other KNR attorneys for my unwillingness to be dishonest to potential KNR clients. This happened in a meeting where all KNR prelitigation attorneys were present, and Nestico played a recording of a phone call that I had over the firm’s phone line

with a potential client. On this call, a car-accident victim told me that he was an independent contractor and sub-contractor, and was concerned about recovering lost wages for work missed due to his car-accident injuries. I advised this potential client that his status as a contractor would make it more complicated to recover damages because he would have to prove not only that he did not work as a result of the accident, but also that he would have otherwise worked on certain jobs, for a certain amount of money during the same time period. After Nestico played the recording of the phone call for everyone in the room, he asked what I had done wrong on the call. The answer, according to Nestico, was that I was too honest with the client in advising him of the complications in recovering damages due to his status as an independent contractor, and that I did not tell the potential client "what he wanted to hear."

11. On March 23, 2017, I received a phone call from a man who identified himself as Attorney Brian Roof with the law firm of Sutter O'Connell, and said that he represents KNR and Nestico in the above-captioned lawsuit. He asked me if I was familiar with the lawsuit and the recently filed proposed Second Amended Complaint. I told him that I was, and had read a press release about the Second Amended Complaint. He asked me about my time at KNR and what documents I took with me when I left, and he said that it was his clients' position that all such documents were confidential. I interpreted this as a threat, and told Mr. Roof that as far as I'm concerned, everything in the press release is true, and that I was terminated by KNR because of my refusal to participate in their kickback schemes.

12. Every document I have disclosed and all information I have provided to Plaintiffs' counsel in this litigation was and is, to the best of my knowledge and understanding, evidence of fraud and illegal activity by KNR. I do not believe that any of it is confidential or subject to any confidentiality agreement. I can't imagine that my own emails mocking the fraud would be confidential.

I affirm the above to be true and accurate to the best of my knowledge under penalty of perjury.

[Signature] 4/3/17
Signature of Affiant Date

State of Ohio
County of Summit

Sworn to and subscribed before me on 4-3-2017

at Sharon Center, Ohio.

[Signature]
(Signature of Notary Public)



Attorney Peter G. Pattakos
Resident Summit County
Notary Public, State of Ohio
My Commission Has No Expiration Date
Sec 147.03 RC

Peter Pattakos
(Printed Name of Notary Public)

Notary Public, State of Ohio

My commission expires on N/A

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al., Plaintiffs, vs. KISLING, NESTICO & REDICK, LLC, et al., Defendants.	Case No. CV-2016-09-3928 Judge James A. Brogan Affidavit of Amanda J. Lantz, Esq.
--	---

I, Amanda J. Lantz, Esq., having been duly sworn, have personal knowledge of the following matters of fact, and testify as follows:

1. I am a practicing attorney licensed in the State of Ohio. I have never been sanctioned or disciplined for my professional conduct.
2. Upon graduating from The University of Dayton School of Law in 2013 and passing the Ohio bar examination, I obtained a job with the law firm of Kisling Nestico and Redick ("KNR"), working as an attorney in the law firm's Columbus, Ohio office.
3. Shortly upon joining the firm in November of 2013, I retained a caseload of approximately 400 active cases at any given time. The firm imposed quotas on its attorneys, setting a goal for each attorney to bring in \$100,000 in attorneys' fees to the firm each month. Given the relatively low-damage cases that came into the Columbus office, I was required to settle approximately 60 to 70 cases each month to make this number. One month, I settled 89 cases on behalf of KNR clients.
4. During my time working at KNR, it was firm policy to direct clients to treat with certain health-care providers, including Dr. Sam Ghoubril, and various chiropractors who



Attorney Peter G. Pattakos
Resident Summit County
Notary Public, State of Ohio
My Commission Has No Expiration Date
Sec 147.03 RC

Amanda Lantz



maintained mutual referral relationships with the law firm.

5. The decision as to whether to refer a client to Dr. Ghoumbrial depended on the level of property damage the client sustained in the car accident at issue. If the property damage was above a certain minimal level, we were encouraged by our KNR supervisors to direct the client to see Dr. Ghoumbrial to obtain “trigger point” injections of certain medication, including pain-blocking and anti-inflammatory medication. Dr. Ghoumbrial would often administer multiple injections to the client, to different parts of the spine, in the same appointment, charging between \$880 to \$1280 for each injection. He would travel to Columbus on certain days to treat groups of KNR clients on the same day.

6. During my time working at KNR, in or around October of 2014, I became aware that an attorney in the Columbus office, Kelly Phillips, sent an email to the firm’s managing partner Alberto R. (“Rob”) Nestico and the managing partner of the Columbus office, Paul Steele, in which Phillips expressed concerns about the firm’s relationship with Dr. Ghoumbrial and stated that this relationship was improper. I understood that Mr. Phillips communicated in this email that KNR attorneys could not legitimately claim to be acting in our clients’ best interests by sending the clients to treat with Ghoumbrial, knowing that the insurance companies viewed his treatment with skepticism, and knowing that the clients could have obtained the same treatment for a substantially lower cost elsewhere. I recall specifically that Mr. Phillips was especially concerned about the fact that Nestico would ensure that Ghoumbrial was paid substantial amounts out of client settlements even when the Defendants’ insurance company representatives told KNR attorneys that they were not crediting or paying for Ghoumbrial’s treatment in settling the case. I knew that Nestico was upset about this email, and sent an angry response to Phillips. This exchange was a topic of conversation and controversy around the office in the time period after it was sent. To my knowledge, the firm did not change its

Page 2 of 6



Attorney Peter G. Pattalos
Resident Summit County
Notary Public, State of Ohio
My Commission Has No Expiration Date
Sec 147.03 RC

*Amanda
Lantz*

policies regarding Dr. Ghoubrial in response to this email or at any other time.

7. The attorneys in the firm were also instructed by our supervisors to send our clients to a chiropractor as soon as possible. We (attorneys and paralegals) were directed to set up reminders, including through the firm's computer system, Needles, to ensure that the client had treated with a chiropractor within 10 days of contacting the firm, and also to ensure that the client had treated with the chiropractor at least 3 times within a certain period of time.

8. It was understood that the chiropractors would send us referrals in exchange for us doing the same. The chiropractor to whom we sent the most referrals from the Columbus office, and who referred our office the most cases, was Nasreen Khan of Town and Country chiropractic. Dr. Khan, and other chiropractors with whom we worked, employed telemarketers who contacted car accident victims using information contained in publicly available crash reports to solicit them for chiropractic services. When these car-accident victims arrived at the chiropractor's office, they were provided with a KNR fee agreement directly by a representative of the chiropractor, or greeted by a so-called "investigator" from KNR who would obtain the car-accident victim's signature on the KNR fee agreement. Town and Country often would not treat the client until they signed the KNR fee agreement and a form "letter of protection" authorizing the law firm to pay the chiropractic bills out of the client's settlement.

9. On several occasions when I asked my clients how they came to treat at Town and Country, they informed me that a representative of their insurance company called them to instruct them to treat there. I knew that this was not the case, and that Town and Country's telemarketers misrepresented themselves as representatives of the client's insurance company to induce the clients to treat there. Either my supervisor or another attorney at KNR informed me that a telemarketer who was known as "Will" (which was not his real name) worked out of

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Attorney Peter G. Pattakos
Resident Summit County
Notary Public, State of Ohio
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the basement of Dr. Khan's home, and that he did not get paid on a given case unless the client he solicited treated with Town and Country at least three times. I also became aware, during my time working at KNR, that Dr. Khan would retaliate against the firm if she believed the firm was not honoring the quid pro quo relationship, and withhold referrals if she learned that a patient she referred to the firm began treating with another chiropractor.

10. When a potential client communicated with the firm, it was KNR office policy to send an "investigator" to sign that client to a fee agreement within 24 hours. The chiropractic offices followed this policy as well would directly request that a KNR "investigator" come to the offices out to sign patients to KNR fee agreements. On rare occasions involving exceptionally high-valued cases, the attorneys were required meet the client within 24 hours to obtain the signature on the fee agreement and establish the attorney-client relationship. We constantly received emails from KNR management pressuring us to sign-up potential clients within 24 hours, who had communicated with the firm. Our supervisors made it clear to us that the purpose of sending these investigators was to avoid losing the potential client to another law firm and secure the attorney-client relationship.

11. It was also office policy to charge an "investigation fee" on almost every case. This fee was charged as a matter of firm policy whether an "investigator" ever met with a client or not. I settled approximately 1,300 cases on behalf of KNR clients during my time with the firm, and an investigation fee between \$50 to \$200 was charged on approximately 95% of these cases, with the exact amount of the fee depending on the mileage the investigator had to travel. In all of these cases, I never became aware of an investigator doing anything at all for the client apart from obtaining the client's signature on the KNR fee agreement.

12. My immediate supervisor at KNR's Columbus office was Paul Steele, Esq. His father, Wes Steele, was the primary "investigator" who signed up clients for the Columbus office.

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Amanda Janty

13. During my time working at KNR, it was also office policy to recommend to clients that they obtain loans, including from a company called Liberty Capital funding. We were instructed by our KNR supervisors, including Paul Steele, to offer our clients loans whenever they became upset or threatened to terminate the firm, to placate them with the promise of quick cash. The manager at Town & Country also made potential clients aware that KNR attorneys could get cash advances for their clients. On more than one occasion, new clients or potential clients told me that they heard our law firm could get them fast money and asked me to do so for them. During a period of my employment at KNR, we were instructed to send our clients exclusively to Liberty Capital whenever they requested a loan or settlement advance.

14. After approximately one year working there, I no longer wanted to be associated with the KNR firm and began to seek employment elsewhere. In or around March of 2015 I took personal time off to attend a series of job interviews with a local legal recruiting company to obtain a position as a legal recruiter. I no longer wanted to practice law. On the day of my final interview with this company, I returned to the office and was called to meet with Paul Steele, who informed me that my employment with KNR was being terminated because I "wasn't a long-term fit." I was never given any warnings by KNR that my employment status was in jeopardy and was never made aware of any issues that would justify my termination or any reasons why I wasn't a long-term fit. In fact, I had recently been recognized as one of the top performing attorneys in the firm and was rewarded by an invitation to attend a trip with Rob Nestico and other top performing KNR attorneys to Punta Cana in the Dominican Republic that January, less than three months before I was terminated. At the time of my termination, I was exclusively using a mobile phone that was issued by the firm. I believe that KNR was monitoring my communications and/or e-mails on that phone and terminated my



Attorney Peter G. Pattakos
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Amanda Sanbf

employment upon learning, by monitoring my communications, that I was seeking employment elsewhere.

I affirm the above to be true and accurate to the best of my knowledge under penalty of perjury.

Amanda Lamb 9.28.18
Signature of Affiant Date

Sworn to and subscribed before me on 9.28.18 at Springfield, Ohio.

Peter G. Pattakos
Notary Public, State of Ohio



Attorney Peter G. Pattakos
Resident Summit County
Notary Public, State of Ohio
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Amanda Lamb

Monday, June 15, 2015 at 8:33:42 PM Eastern Daylight Time

Subject: Rooms.....

Date: Wednesday, November 6, 2013 at 8:59:12 AM Eastern Standard Time

From: Brandy Brewer

To: Prelit Attorney, Mike Simpson, Mike Simpson (michaelsimpson12@yahoo.com)

Priority: High

Room Arrangements:

- Cawley/Floros
- Tassi/Schneider
- Tony/Waleed
- Rob/Paul
- Sam
- Simpson/Matt
- Horton/Robert
- Zaber/Tom
- Jason/Josh



Brandy Brewer

Kisling, Nestico & Redick

Director of Operations

3412 W. Market St., Akron, Ohio 44333

Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown



Subject: FW: Gotta love our clients!!!

From: gpetti@knrlegal.com
To: pettigary@yahoo.com
Date: Tuesday, November 27, 2012, 3:25:57 PM EST

Gary M. Petti
Kisling, Nestico & Redick
Attorney At Law
3412 W. Market St., Akron, Ohio 44333
Main: 330-869-9007 | Fax: 330-869-9008 | Outside Ohio: 800-978-9007

Locations: Akron, Canton, Cleveland, Cincinnati, Columbus, Dayton, Toledo & Youngstown

-----Original Message-----

From: Rob Nestico
Sent: Tuesday, November 27, 2012 3:25 PM
To: Nomiki Tsarnas
Cc: Attorneys; Brandy Lamtman
Subject: Re: Gotta love our clients!!!

They don't like macaroni grill? Next time get Popeyes chicken.

Sent from iPhone of Rob Nestico

On Nov 27, 2012, at 3:19 PM, "Nomiki Tsarnas" <[tsarnas@knrlegal.com]> wrote:

- > One of our clients sold our gift card to a pawn shop April's friend works at!!! LMAO!!!!
- >
- > From: 3305064473@vzwpx.com [mailto:3305064473@vzwpx.com]
- > Sent: Tuesday, November 27, 2012 3:17 PM
- > To: Nomiki Tsarnas
- > Subject:
- >
- >

> <IMG_6568.jpg>

