

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al

Plaintiffs,

v.

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

Defendants.

Case No. CV-2016-09-3928

Judge James Brogan

**Non-Party Julie Ghoubrial's Motion  
To Stay the Court's May 14, 2019 Decision**

Now comes non-party witness Julie Ghoubrial, by and through counsel, and respectfully moves this Court to stay the May 14, 2019 Decision with regards to the *in camera* presentation of her deposition transcript as follows:

This Court ruled on May 14, 2019 that non-party witness Julie Ghoubrial's deposition transcript from her domestic relations case (Summit County Domestic Relations Court Case No.: DR-2018-04-1027) should be delivered to this Court *in camera* and only reviewed by the Court and not by the parties or counsel until further order of the Court.

As noted earlier with filings with this Court, the presiding judge in non-party witness Julie Ghoubrial's and Defendant Sameh Ghoubrial's divorce case, Judge John Quinn, has previously ruled that the deposition transcript from Ms. Ghoubrial's deposition would be held as a confidential document and not disclosed to any parties without further order of the Summit County Domestic Relations Court.

This Court has now ruled that the deposition transcript of Ms. Ghoubrial should be produced as part of this civil matter.

However, this Court has also indicated that the contents of the deposition transcript are not relevant to the immediate matters pending with this case and would not be reviewed or otherwise utilized until immediate pending matters with regards to class certification are resolved by the Court.

As indicated earlier, Ms. Ghoubrial has been placed in an untenable situation as the result of two conflicting judicial orders.

Allowing this Court's Order with regards to the presentation of the deposition transcript *in camera*, to be delayed or otherwise held in abeyance until other matters for this Court are resolved, may allow sufficient time for the deposition transcript to become a moot issue with this Court or for other issues to resolve such that Ms. Ghoubrial is not placed in a situation where she must choose the validity of one court order versus another.

Therefore, Ms. Ghoubrial strongly endorses the request that has been made by other parties to stay the execution of the May 14, 2019 decision in order to allow further time to pass to determine if the deposition transcript is truly necessary for this Court's review of this matter.

Respectfully Submitted,

/s/ Gary M. Rosen

**GARY M. ROSEN**

Supreme Ct. #0009414

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was filed electronically with the Court and sent via e-mail to the below parties on this 23<sup>rd</sup> day of May, 2019. The parties, through counsel, may also access this document through the Court's electronic docket system:

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*/s/ Gary M. Rosen*

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