

**IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO**

MEMBER WILLIAMS, <i>et al.</i> , Plaintiff, vs. KISLING, NESTICO & REDICK, LLC, <i>et al.</i> , Defendants.	Case No. CV-2016-09-3928 Judge James A. Brogan Motion for Protective Order to Enforce the Established April 15, 2019 Class-Discovery Deadline
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Since the expiration of the April 15, 2019 class-discovery deadline established by the Court, Defendants have served various discovery requests to Plaintiffs and subpoenas for depositions and documents on non-party witnesses. Thus, Plaintiffs hereby seek a protective order against these discovery requests and subpoenas and any others served in violation of the April 15 deadline.

If the Defendants are really in need of any post-deadline discovery in advance of the Court's determination of class-certification, they should be required petition the Court for an order providing for it. Given the extensive evidence Plaintiffs have submitted to date supporting their Motion for Class Certification, it is extremely doubtful that the Defendants could explain how the additional discovery they seek would accomplish anything but create issues of fact on the merits to be decided by the jury. If the Court finds to the contrary after reviewing the parties' class-certification briefs, it could stay its determination of class-certification pending any additional discovery that it deems necessary or appropriate.

Respectfully submitted,

/s/ Peter Pattakos

Peter Pattakos (0082884)
Rachel Hazelet (00097855)
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 24, 2019, using the Court's e-filing system, which will serve copies on all necessary parties.

/s/ Peter Pattakos

Attorney for Plaintiffs