

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

Member Williams, et al.	:	
	:	
Plaintiffs,	:	Case No. 2016 CV 3928
	:	
v.	:	
	:	Judge Brogan
Kisling, Nestico & Redick, LLC <i>et al.</i> ,	:	
	:	
Defendants.	:	

**NON-PARTY NAZREEN KHAN AND STEPHEN RENDEK’S MEMORANDUM IN  
OPPOSITION TO PLAINTIFFS’ MOTION TO FILE A SIXTH AMENDED  
COMPLAINT**

**I. INTRODUCTION**

This matter is before the Court on Plaintiffs Member Williams, Thera Reid, Monique Norris, and Richard Harbour’s (collectively “Plaintiffs”) motion to file a sixth amended complaint. In Plaintiffs’ latest motion to amend their complaint, they seek to add five new parties including Nazreen Khan and Stephen Rendek who are shareholders of a corporation named Town & Country Chiropractic, Inc. (“Town & Country”) simply because it has made patient referrals to Kisling, Nestico & Redick, LLC (“KNR”) when its clients are looking for a lawyer and Dr. Sam Ghoubril (“Ghourbril”), when its patients need treatment that exceeds a chiropractor’s scope of practice.

According to Plaintiffs, Town & Country’s practice of referring patients to KNR and/or Ghoubril is allegedly part of an elaborate scheme to enrich KNR and Ghoubril to Town & Country’s detriment. Setting aside the readily apparent contradiction of Plaintiffs’ imaginary scheme, Plaintiffs lack standing to bring any claims against Khan and Rendek. Moreover, and even if Plaintiffs did have standing to bring the claims raised in the Sixth Amended Complaint against Khan and Rendek (which they do not), the allegations in the proposed complaint fail as a

matter of law. As such, Plaintiffs' motion to file a sixth amended complaint seeking to add Khan and Rendek as defendants to the pending action must be denied.

## II. STATEMENT OF THE CASE PERTINENT TO THIS MOTION

### Procedural History

This matter was originally filed on September 16, 2016. Since that original filing, the complaint has since been amended five times (as recently as November 27, 2018), the parties have conducted extensive discovery including exchanging both written and document discovery, completed eighteen (18) party and non-party depositions, completed class discovery, attended numerous court hearings and conferences, and filed numerous motions and briefs on a wide-variety of issues. In fact, in the almost three years that this matter has been pending, the Summit County Clerk of Courts has already entered hundreds of items on the Court's docket, which only provides a partial glimpse of the significant financial resources and time that the parties and the Court have already devoted to this matter. All of these efforts resulted in the Plaintiffs preparing and filing a motion seeking certification of three class actions based upon the purported conduct of KNR, Ghoubrial, and Minas Floros, a chiropractor in the Akron area. Only after Plaintiffs' motion for class certification was filed, did Plaintiffs seek to add Nazreen Khan, Stephen Rendek, and three other Ohio chiropractors as defendants to this lawsuit.

### Plaintiffs' Motion for leave to file a Sixth Amended Complaint

On May 23, 2019, Plaintiffs filed a motion seeking leave to file a sixth amended complaint pursuant to Ohio Civil Rule 15(A) and (B). Plaintiffs claim that: (1) their motion to amend will not impede the Court's decision on class certification; (2) defendants suffer no undue prejudice from the proposed amended complaint; (3) little to no discovery is necessary for the

new party defendants; and (4) the new defendants can proceed on a separate track from the parties that are already defendants in the pending action. Plaintiffs' assertions are unfounded.

### *The Sixth Amended Complaint*

In its proposed sixth amended complaint, Plaintiffs brings claims for fraud, unjust enrichment, and violations of Ohio's Corrupt Practices Act against Nazreen Khan and Stephen Rendek.<sup>1</sup> The named Plaintiffs Williams, Reid, Norris, and Harbour never treated with Town & County, Khan, or Rendek, never paid anything to Town & Country, Khan, or Rendek or interacted with Town & County, Khan, or Rendek in any manner. *See* Affidavit of Stephen Rendek, attached as Exhibit A.

### *Count 1-Fraud*

Count 1 of Plaintiffs' proposed sixth amended complaint seeks a class on behalf of all current and former KNR clients who have had deducted from their settlements any fees paid to Ghoubrial's personal injury clinic for trigger point injections, TENS units, back braces, kenalog, or office visits from 2010 to the present. Proposed Sixth Amended Complaint at ¶157. Plaintiffs have identified this group as the "Price-Gouging Class" and seek relief from all defendants including Khan and Rendek. The theory behind this cause of action is fraud. In pleading this claim, Plaintiffs lump all defendants together and note that "where any of the Defendants-in-particular the chiropractor Defendants-did not have any direct involvement or contact with any particular Plaintiff or Class A member, these Defendants are jointly and severally liable both for aiding and abetting fraud and conspiring to commit fraud." *Id.* at ¶¶156-170.

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<sup>1</sup> There are additional defendants and other causes of action in Plaintiffs' proposed sixth amended complaint, but those claims are not against Khan and Rendek so they will not be addressed here.

Count 3-Unjust Enrichment

Count 3 of Plaintiffs' proposed sixth amended complaint asserts a cause of action for unjust enrichment against all defendants (including Khan and Rendek) on behalf of the proposed Price Gouging Class. Proposed Sixth Amended Complaint at ¶¶177-181.

Count 5-Ohio Corrupt Practices Act

Count 5 of Plaintiffs' proposed sixth amended complaint asserts a claim that defendants (including Khan and Rendek) allegedly conspired together to drive patients to Ghoubrial in order for them to recover higher settlement amounts. Plaintiffs assert their claims on behalf of the proposed Price Gouging Class. Proposed Sixth Amended Complaint at ¶¶187-195.

### III. LAW & ARGUMENT

#### A. Plaintiffs' motion for leave to file a sixth amended complaint must be denied.

The Ohio Supreme Court has found that the language of Ohio Civil Rule 15(A) provides for a liberal amendment policy unless the deciding court determines that granting a party leave to amend would result in bad faith, undue delay, or undue prejudice.<sup>2</sup> *Current Source, Inc. v. Elyria City Sch. Dist.*, 157 Ohio App.3d 765, 2004-Ohio-3422, ¶12 (9th Dist.). The US Supreme Court has previously held that leave to amend should not be freely given when the amendment is futile, *i.e.* fails to state a claim. *Id.*; *See also Wilmington Steel Prod., Inc. v. Cleveland Elec. Illuminating Co.*, 60 Ohio St.3d 120, *syllabus* (1991)(“Where a plaintiff fails to make a *prima facie* showing of support for new matters sought to be pleaded, a trial court acts within its discretion to deny a motion to amend the pleading.”)(emphasis in the original).

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<sup>2</sup> Plaintiffs also seek leave to amend their complaint under Ohio Civil Rule 15(B). However, Ohio Civil Rule 15(B) has no application in matters that have not proceeded to trial. *Thomas v. Reserves Network*, 9th Dist. Lorain No. 10CA009886, 2011-Ohio-5857, ¶8 (“Civ.R. 15(B) governs the amendment of a complaint to conform to the evidence at trial and has no application in a case where there has been no trial.”).

In determining what constitutes prejudice, the court considers whether the assertion of the new claim or defense would require the opponent to expend significant resources to conduct discovery and prepare for trial or significantly delays the resolution of the dispute. *Hendricks v. Wessell*, Case No. 2:11-cv-399, 2012 WL 395067, \*2 (S.D. Ohio Feb. 7, 2012). Other factors the court must take into consideration in ruling upon a motion for leave to file an amended complaint is whether there have been repeated failures to cure deficiencies in the pleadings and whether the matters contained in the proposed amended complaint could have been advanced earlier such that the disposition of the case would not have been disrupted by a later, untimely amendment. It is against this backdrop that Plaintiffs' motion to amend must be viewed.

1. *Allowing amendment of the complaint for a sixth time at this stage of the proceedings will cause significant delay and will be highly prejudicial to the parties.*

Plaintiffs' motion to amend their complaint for a sixth time will impact the Court's decision on class certification. The reason for this is simple, Plaintiffs are seeking to add Khan and Rendek as defendants to the proposed Price Gouging Class in which extensive discovery has already been completed and Plaintiffs' motion for class certification has already been filed. If, as Plaintiffs propose, Khan and Rendek are added as defendants to the proposed Price Gouging Class, Khan and Rendek first must be provided an opportunity to conduct all necessary discovery before a determination regarding the legitimacy of such a class is determined by the Court. This discovery would include exchanging written discovery with the current parties to the lawsuit and also conducting party and third party depositions. In addition, Khan and Rendek would also need sufficient time to review the entirety of the filings in this matter, the transcripts of depositions that have already been completed, and all documents already produced in discovery. There is no chance that all of this discovery can be completed prior to the Court's current June

15, 2019 deadline to respond to Plaintiffs' motion for class certification. Instead, briefing on class certification will have to be delayed a minimum of 9 months.

Plaintiffs' assertion that their claims against Khan and Rendek can proceed on a separate track is meritless. If Khan and Rendek are defendants in the proposed Price Gouging Class, they must first have the opportunity to conduct discovery on the appropriateness of such a class. It should be clear that Khan's and Rendek's due process rights would be violated by adding them as defendants to a certified class action without first affording them an opportunity to contest the merits of that class.

On a related note, permitting amendment of Plaintiffs' complaint for a sixth time will cause undue prejudice to Defendants. The undue prejudice in adding Khan and Rendek to these proceedings will cause the parties to be subject to new discovery requests, require the parties to be deposed a second time, and also require the parties to sit through third party depositions again. All of these new expenses would not have to be incurred if Khan and Rendek were parties at the outset of this litigation, instead of being added now almost three years later.

2. Plaintiffs' motion for leave to file a sixth amended complaint is not timely.

Courts routinely hold that a motion requesting leave to file an amended complaint two years after the filing of the original complaint and after discovery has been completed is not timely. *Lipchak v. Chevington Woods Civil Ass'n*, 5th Dist. Fairfield No. 14-CA-40, 2015-Ohio-263, ¶46 (denying motion to amend due to undue prejudice and delay because two amended complaints had already been filed and discovery had already been completed); *Enyart v. Karnes*, Case No. 2:09-CV-687, 2011 WL 4367352, \*3 (S.D. Ohio Sept. 19, 2011)(denying motion to amend because three amended complaints had already been filed and the matter had been pending for over two years); *Adams v. Lucent Tech., Inc.*, Case No. 2:03-cv-300, 2005 WL

8162173, \*2 (S.D. Ohio Aug., 19, 2005)(denying motion to amend because the matter had been pending for over two years, and an amendment would only further delay the proceedings by the increased costs of additional discovery); *Radio Parts Co. v. Invacare Corp.*, 178 Ohio App.3d 198, 2008-Ohio-4777, ¶11 (10th Dist.)(holding the same); *Lundeen v. Graff*, 46 N.E.3d 236, 2015-Ohio-4462, ¶30 (10th Dist.) (holding the same); *Bachtel v. Jackson*, 10th Dist. Franklin No. 08AP-714, 2009-Ohio-1554, ¶27 (holding the same); *Brown v. First Energy Corp.*, 159 Ohio App.3d 696, 2005-Ohio-712, ¶7 (9th Dist.) (denying motion to amend because the matter had been pending for over three years).

Similarly, the Court should deny Plaintiffs' motion for leave to file a sixth amended complaint because the matter has been pending for over two and a half years, and Plaintiffs through five previous amendments have already had ample time to amend their complaint. Simply put, Plaintiffs' motion for leave to file an amended complaint is not timely.

3. *Plaintiffs' sixth amended complaint fails to state a claim against Khan and Rendek.*

a. *Plaintiffs Williams, Reid, Norris, and Harbour lack standing to bring any causes of action against Khan and Rendek.*

It is elementary that a plaintiff may not sue a defendant who has caused him no legal injury. *Leonard v. Merrill, Lynch, Pierce, Fener & Smith, Inc.*, 64 F.R.D. 432, 434 (S.D. N.Y. Sept. 30, 1974). Individual standing is necessary in order to pursue a class action on behalf a group of plaintiffs. *Paoletti v. The Travelers Indem. Co.*, 6th Dist. Lucas No. L-75-196, 1977 WL 198462, \*3, (May 6, 1977)(“Appellant’s lack of individual standing is fatal to her right to maintain a class action as to all defendants except Travelers.”).

Here, Khan, Rendek, and Town & Country never treated Williams, Reid, Norris, and Harbour, never received any payments and/or benefits from Williams, Reid, Norris, and

Harbour, or ever communicated with Williams, Reid, Norris, and Harbour. Rendek Aff. at ¶¶2-13. Hence, Williams, Reid, Norris, and Harbour lack standing to pursue any claims against Khan and Rendek. Without proof of standing by the named Plaintiffs, they similarly lack standing to be representatives of the proposed Price Gouging Class and any other class against Khan and Rendek. *6803 Bolevard East, LLC v. Directv, LLC*, 17 F.Supp.3d 427, 432 (D. NJ Apr. 9, 2014)(“Because the parties agree that no named plaintiff has suffered injury at the hands of DirecTech, no named plaintiff has standing to pursue claims against DirecTech. The named Plaintiffs may not represent a class against DirecTech.”); *Leonard.*, 64 F.R.D. at 434-35 (S.D. N.Y. Sept. 30, 1974)(granting summary judgment to defendants because “the named plaintiffs have sued defendants with whom they have had no dealings whatsoever and perforce who have caused them no legal injury.”); *Godec v. Bayer Corp.*, Case No. 1:10-CV-224, 2011 WL 5513202, \*2 (N.D. Ohio Nov. 11, 2011)(“Because Godec never purchased Men’s 50+ Advantage, he has suffered no injury from any breach of any warranty with regard to that product. Accordingly, he lacks standing to makes claims regarding the Men’s 50+ Advantage vitamins, and the Court DENIES the motion to certify a class containing persons who purchased only Men’s 50+ Advantage vitamins.”). As such, all causes of action proposed in the sixth amended complaint as against Khan and Rendek fail as a matter of law.

***b. Ohio does not recognize a cause of action for aiding and abetting fraud.***

Implicitly acknowledging that Plaintiffs lack standing to pursue claims against Khan and Rendek, Plaintiffs sixth amended complaint alleges that the chiropractic defendants, who never treated Plaintiffs (like Khan and Rendek), nonetheless are still responsible for Plaintiffs’ damages because they allegedly aided and abetted others who purportedly committed fraud. Proposed Sixth Amended Complaint at ¶167. Problematic with Plaintiffs’ claim is Ohio law



does not recognize a tort of aiding and abetting fraud. *Collins v. Nat'l City Bank*, 2nd Dist. Montgomery No. 19884, 2003-Ohio-6893, ¶ 32 (“the court correctly held that aiding and abetting common law fraud is not cognizable in law.”); *Childs v. Charske*, 129 Ohio Misc.2d 50, 2004-Ohio-7331, ¶36 (“...Ohio does not recognize claims for aiding and abetting common law fraud. One who engages in any way in fraudulent behavior is liable for the fraud itself, not as an aider and abettor to fraud.”).

In fact, Ohio law does not recognize a cause of action for aiding and abetting any tortious act by a third party. *Wells Fargo Bank v. Smith*, 12th Dist. Brown No. CA2012-04-006, 20013-Ohio-855, ¶36. A person is only liable if he or she engages in behavior that is unlawful and not simply because he or she aided or abetted wrongful conduct. *Id.* Hence, Khan and Rendek cannot be liable as a matter of law to the Price Gouging Class for their purported fraud damages.

***c. Plaintiffs' claim that Defendants conspired to commit fraud cannot stand independently without an underlying tort claim.***

Without the underlying claim of fraud, Plaintiffs' civil conspiracy claim to commit fraud also fails. *Marriott Corp.. v. Lerew*, 8th Dist. Cuyahoga No. 85551, 2005-Ohio-5336, ¶24. There can be no cause of action for conspiracy to commit fraud because there is no underlying unlawful act. *Marriott Corp.*, 2005-Ohio-5336 at ¶24 (“Marriott cannot prove conspiracy to commit fraud without first proving fraud, the underlying unlawful act.”).

***d. There is no legal basis to pierce Town & Country's corporate veil in order to hold Khan and Rendek personally liable.***

The principle that shareholders, officers, and directors of a corporation are generally not liable for the debts of a corporation is ingrained in Ohio law. *Dombrowski v. Wellpoint, Inc.*, 199 Ohio St.3d 506, 2008-Ohio-4827, ¶16. Piercing the corporate veil remains a rare exception to be applied only in the case of fraud or certain other exceptional circumstances. *Id.* at 17. Yet,

Plaintiffs make no effort to even allege that Town & Country's corporate veil should be pierced in order to hold Khan and Rendek personally responsible for acts they purportedly performed as agents of the company. Such allegations are necessary for the Court to weigh in considering whether to add Khan and Rendek personally as defendants to this action. Absent allegations that Town & Country's corporate veil should be pierced, Plaintiffs' proposed amended complaint seeking to add Khan and Rendek personally as defendants fails.

***e. Plaintiffs' allegations of fraud regarding Khan and Rendek lack specificity/particularity under Ohio Civil Rule 9(B).***

Ohio Civil Rule 9(B) requires a plaintiff to plead fraud with particularity, meaning that the plaintiff must allege the time, place, and content of the alleged misrepresentation upon which the fraud claim is based. *Moran II v. A/C Fin., Inc.*, Case No. 3:05CV071, 2006 WL 8441932, \*4 (S.D. Ohio Aug. 29, 2006). In addition, a complaint may not rely upon blanket references to acts or omissions by all of the defendants, for each defendant named in the complaint, is entitled to be apprised of the circumstances surrounding the fraudulent conduct which he or she is individually charged. *Id.*

Here, Plaintiffs make no effort identifying what statements and/or misrepresentations Khan and/or Rendek allegedly made to them. This makes sense as Khan and Rendek have never communicated with the named Plaintiffs. Rendek Aff. at ¶¶10-13. Without any detail of the specific statements and/or conduct that forms the basis of Plaintiffs' fraud claim regarding Khan and Rendek, Plaintiffs' proposed amended complaint fails as a matter of law.

***f. The purported scheme among defendants is self contradictory and cannot satisfy Ohio's Corrupt Practices Act.***

There are numerous problems with Plaintiffs' claim that defendants acted in concert within the meaning of Ohio's Corrupt Practices Act to the detriment of Plaintiffs' proposed Price

Gouging Class. But one of the most glaring issues as it relates to Khan and Rendek demonstrates on the face of the proposed complaint that there was no enterprise and/or conspiracy at all. According to Plaintiffs, Khan, Rendek, KNR, and Ghoubrial (along with the other defendants) purportedly agreed that Town & Country would send patients to Ghoubrial in order for Ghoubrial to provide treatments at allegedly exorbitant costs. The alleged purpose of Ghoubrial's purportedly inflated charges was for KNR to recover higher settlement amounts from the tortfeasors' insurance companies. As a result of these allegedly above average medical bills, Khan, Rendek, KNR, and Ghoubrial theoretically would receive more money than if Ghoubrial did not treat these patients.

However, Plaintiffs, in preparing their motion to amend, admitted Ghoubrial's treatment of Town & County's patients resulted in Town & Country's bills being cut dramatically more than if Ghoubrial simply had not treated Town & Country's patients at all. Hence, Khan and Rendek purportedly conspired with the other defendants to get paid less than if Ghoubrial did not treat any of Town & Country's patients. As should be readily apparent, there is no financial incentive for Khan and Rendek to participate in such a conspiracy. In fact, there is a disincentive for Khan and Rendek to participate in such a conspiracy, which simply demonstrates that there is no conspiracy or enterprise at all within the meaning of the Ohio Corrupt Practices Act.

#### **IV. CONCLUSION**

Plaintiffs' motion for leave to file a sixth amended complaint must be denied. First, Plaintiffs lack standing to bring any claims against Khan and Rendek. Second, allowing Plaintiffs to file a sixth amended complaint will cause undue delay and prejudice to defendants. Finally, Plaintiffs' proposed causes of action against Khan and Rendek fail as a matter of law. As such, it is futile to allow Plaintiffs to file a sixth amended complaint.

Respectfully submitted,

/s/ Damion M. Clifford

James E. Arnold (0037712)  
Damion M. Clifford (0077777)  
JAMES E. ARNOLD & ASSOCIATES, LPA  
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*Counsel for Nazreen Khan and Stephen  
Rendek*

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of Nazreen Khan and Stephen Rendek's Memorandum in Opposition was filed again on this 4th day of June 2019 via the Court's electronic filing system. Parties may access the filing through the Court's system.<sup>3</sup>

/s/ Damion M. Clifford

Damion M. Clifford

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<sup>3</sup> This matter was originally filed with the Summit County Clerk of Courts on June 3, 2019 and served upon Plaintiffs' counsel by electronic mail that same day. The Summit County E-File system would not accept the filing because Nazreen Khan and Stephen Rendek are not parties to this action. In order to add Nazreen Khan and Stephen Rendek as persons of interest in this action, a blank cover page was submitted with the memorandum in opposition and notice of appearance. According to the Summit County Clerk, persons of interests can only be added manually by telephone and not electronically. Copies of proof of the original filings are attached hereto as Exhibits B and C.

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

Member Williams, et al.	:	
	:	
Plaintiffs,	:	Case No. 2016 CV 3928
	:	
v.	:	
	:	Judge Brogan
Kisling, Nestico & Redick, LLC <i>et al.</i> ,	:	
	:	
Defendants.	:	

**AFFIDAVIT OF STEPHEN M. RENDEK, III**

Franklin County :  
: ss  
State of Ohio :

I, Stephen M. Rendek, III being duly cautioned and sworn do hereby state based upon personal knowledge the following:

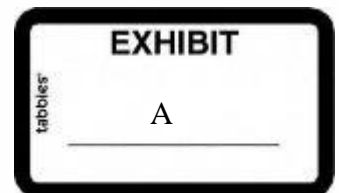
1. I, along with Nazreen Khan, are shareholders in Town & Country Chiropractic, Inc. ("Town & Country"). Town & Country is an Ohio corporation that provides chiropractic services to patients in Columbus, Ohio.

2. I, Nazreen Khan, and Town & Country have never provided any chiropractic services to Member Williams.

3. I, Nazreen Khan, and Town & Country have never provided any chiropractic services to Thera Reid.

4. I, Nazreen Khan, and Town & Country have never provided any chiropractic services to Monique Norris.

5. I, Nazreen Khan, and Town & Country have never provided any chiropractic services to Richard Harbour.



6. I, Nazreen Khan, and Town & Country have never received any payment and/or benefit from Member Williams.

7. I, Nazreen Khan, and Town & Country have never received any payment and/or benefit from Thera Reid.

8. I, Nazreen Khan, and Town & Country have never received any payment and/or benefit from Monique Norris.

9. I, Nazreen Khan, and Town & Country have never received any payment and/or benefit from Richard Harbour.

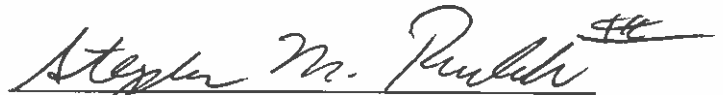
10. I, Nazreen Khan, and Town & Country have never communicated with Member Williams.

11. I, Nazreen Khan, and Town & Country have never communicated with Thera Reid.

12. I, Nazreen Khan, and Town & Country have never communicated with Monique Norris.

13. I, Nazreen Khan, and Town & Country have never communicated with Richard Harbour.

**FURTHER AFFIANT SAYETH NOT.**

  
Steven M. Rendek III

On June 3, 2019 appeared Steven M. Rendek III and he swore to and subscribed in my presence.

Notary Public

Zachary Bias



Zachary Bias, Attorney At Law  
NOTARY PUBLIC - STATE OF OHIO  
My commission has no expiration date  
Sec. 147.03 R.C.

**Terrilynn Ashby**

**From:** noreply@summitoh.net  
**Sent:** Monday, June 03, 2019 10:19 PM  
**To:** Damion Clifford  
**Subject:** Efiling - Secondary Case Filing Submitted

## Summit County Clerk of Courts

### Secondary Filing Submission Confirmation

The Summit County Clerk of Courts has received your secondary electronic filing. Review the details below and retain for your records. Please note that although we may have received your submission, it is not effective until accepted. If accepted, the filing date will be the date indicated below.

#### Case Details

**Caption:** MEMBER WILLIAMS vs KISLING NESTICO & REDICK LLC  
**Case Number:** CV-2016-09-3928  
**Assigned Judge:** Judge KATHRYN MICHAEL  
**Filed By:** DAMION M CLIFFORD (0077777)  
**Filed on Behalf of:** STEPHEN RENDEK  
**File Date:** 6/3/2019 10:16:21 PM  
**Transaction ID:** 535697

#### Parties Added

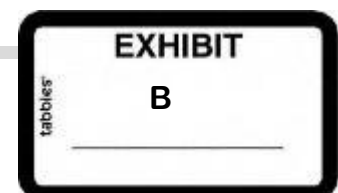
Party Type	Party Name	Address
Attorney	DAMION CLIFFORD	115 W. Main Street 4th Floor Columbus, OH 43215
Party Of Interest	STEPHEN RENDEK	3894 E. Broad Street Columbus, OH 43213

#### Documents Filed

Document ID	Document Name
-745961	MEMORANDUM IN OPPOSITION
-745960	NOTICE OF APPEARANCE
-745959	INSTRUCTIONS TO CLERK FOR SERVICE
-745958	AMENDED COMPLAINT

#### Proposed Orders Filed

#### Service of Process





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**Payment Information**

<b>Fee Type</b>	<b>Fee Amount</b>	<b>Transaction Information</b>
Filing Fee	\$25.00	Authorization Number: 07335P
Service Fee	\$0.00	
Transaction Fee	\$0.75	
<b>Total Fees Charged</b>	<b>\$25.75</b>	

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If you have any questions, please contact the Summit County Clerk of Courts at 330-643-2211.  
Please have your case number handy.

**Terrilynn Ashby**

**From:** noreply@summitoh.net  
**Sent:** Monday, June 03, 2019 10:15 PM  
**To:** Damion Clifford  
**Subject:** Efiling - Secondary Case Filing Submitted

## Summit County Clerk of Courts

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**Case Number:** CV-2016-09-3928  
**Assigned Judge:** Judge KATHRYN MICHAEL  
**Filed By:** DAMION M CLIFFORD (00777777)  
**Filed on Behalf of:** NAZREEN KHAN  
**File Date:** 6/3/2019 10:09:18 PM  
**Transaction ID:** 535693

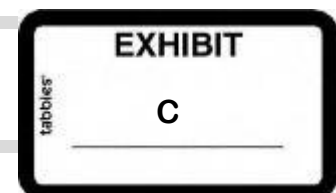
#### Parties Added

Party Type	Party Name	Address
Attorney	DAMION CLIFFORD	115 W. Main Street 4th Floor Columbus, OH 43215
Attorney	DAMION CLIFFORD	115 W. Main Street Suite 400 Columbus, OH 43215
Party Of Interest	STEPHEN RENDEK	3894 E. Broad Street Columbus, OH 43213
Party Of Interest	NAZREEN KHAN	3894 E. Broad Street Columbus, OH 43213

#### Documents Filed

Document ID	Document Name
-745957	MEMORANDUM IN OPPOSITION
-745956	NOTICE OF APPEARANCE
-745955	INSTRUCTIONS TO CLERK FOR SERVICE
-745954	AMENDED COMPLAINT

#### Proposed Orders Filed



## Service of Process

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## Payment Information

Fee Type	Fee Amount	Transaction Information
Filing Fee	\$25.00	Authorization Number: 03796P
Service Fee	\$0.00	
Transaction Fee	\$0.75	
<b>Total Fees Charged</b>	<b>\$25.75</b>	

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If you have any questions, please contact the Summit County Clerk of Courts at 330-643-2211.  
Please have your case number handy.