

# EXHIBIT W

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, et al.,	)	Case No. CV-2016-09-3928
	)	
Plaintiffs,	)	Judge James A. Brogan
	)	
vs.	)	<b><u>AFFIDAVIT OF JOSHUA R.</u></b>
	)	<b><u>ANGELOTTA</u></b>
KISLING, NESTICO, & REDICK,	)	
LLC, et al.,	)	
	)	
Defendants.	)	

Now comes Affiant, Joshua R. Angelotta, having first been sworn upon his oath, and attests as follows:

- 1) That I am of legal age, sound mind, and otherwise competent to testify.
- 2) That this affidavit is based on my personal knowledge.
- 3) That I am a licensed attorney and was admitted to the Ohio Bar in 2005.
- 4) That the primary focus of my practice has been and is personal injury law and I have represented defendants and plaintiffs with respect to claims and litigation.
- 5) I have been employed at Kisling, Nestico & Redick, LLC since 2011 and I am a Senior Partner of the firm.
- 6) A significant number of my clients do not have health insurance coverage.
- 7) From time to time, clients that have health insurance coverage have advised me that they do not want medical bills related to the accident submitted to their health insurance carriers and/or have instructed me to seek payment of these bills solely from the tortfeasor.

- 8) On various and numerous occasions, as part of my negotiation of my clients' claims, I have negotiated reduction of medical bills directly with medical providers including but not limited to Dr. Sam Ghoubrial.
- 9) On various and numerous occasions, as part of my negotiation of my clients' claims, I have recommended to management that KNR reduce its agreed-on contingency fee and had my recommendations approved.
- 10) The amount of medical bill and attorney fee reductions depends on the facts and circumstances of each case.

FURTHERMORE AFFIANT SAYETH NAUGHT.

  
JOSHUA R. ANGELOTTA

STATE OF OHIO

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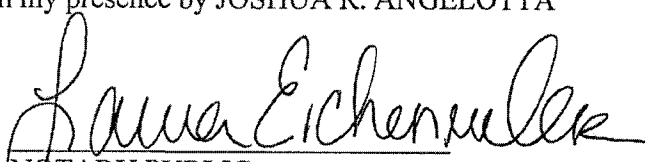
) SS:

COUNTY OF CUYAHOGA

)

SWORN TO AND SUBSCRIBED in my presence by JOSHUA R. ANGELOTTA  
this 6 day of June, 2019.

  
**LAURA EICHENMILLER**  
NOTARY PUBLIC • STATE OF OHIO  
My commission expires June 24, 2023

  
NOTARY PUBLIC