**EXTO** 

## **EXHIBIT T**

CV-2016-09-3928

## AFFIDAVIT OF PAUL S. HILLENBRAND

STATE OF OHIO	)
COUNTY OF FYONKLIN	) ss )

NOW COMES AFFIANT, Paul S. Hillenbrand, having first been sworn upon his oath, and states for his Affidavit as follows:

- 1. I am over 18 years of age, of sound mind, and otherwise competent to testify.
- 2. In 1998, I retired from the Columbus Police Department ("CPD") in Columbus, Ohio, where I was employed for twenty-five (25) years. As part of my training with the CPD, I attended and graduated from the Columbus Police Academy. I served in various roles during my tenure at the CPD including work as a Patrolman on local and highway patrol assignments, investigating traffic fatalities and hit/skip incidents as an Accident Investigator, and supervising patrol shifts as a Patrol Sergeant.
- 3. In the course of my time with the CPD I investigated, or assisted in the investigation of, approximately six thousand to seven thousand (6,000-7,000) motor vehicle collisions.
- 4. Following my retirement from the CPD in 1998, I worked in private security for approximately ten (10) years.
- 5. Since 2012, I have performed investigative services for the law firm Kisling, Nestico and Redick ("KNR") as an independent contractor, and I am paid a flat rate for all services requested by KNR on a given case assigned to me.
- 6. In addition to my work for KNR, I have continued to provide security services for another client on a part time basis.
- 7. When I am assigned a case to investigate on behalf of KNR, in addition to meeting with a prospective client to obtain a signature on the KNR contingency fee agreement, I also obtain signatures on patient authorizations or Medicare "Proof of Representation" forms, interview clients about the collision, obtain any correspondence from the insurance company in the possession of the client, review the applicable Ohio Traffic Crash Report and any related investigation materials, identify any potential witnesses to the crash, identify the party responsible for the crash, obtain copies of any medical insurance

information in the possession of the client, take photos of the client's vehicle when available and photos of any visible physical injuries, and collect and document any further information to pass along to the assigned attorney at KNR.

8. After the original investigation is completed, from time to time I will be asked to meet with clients or witnesses to obtain additional information, travel to salvage yards to photograph vehicles, pick up medical records or other documents, photograph the crash scene, canvas the crash scene to determine if any video surveillance is available, or perform additional services.

FURTHER AFFIANT SAITH NAUGHT.

STATE OF OHIO

COUNTY OF WANUE

On this \_\_\_\_\_\_ day of May, 2019, Affiant Paul S. Hillenbrand, came before me and, having first been sworn upon his oath, attested that the fact set forth in this Affidavit are true and accurate to the best of his knowledge.