

# EXHIBIT P

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.                         | ) | <u>AFFIDAVIT OF</u>      |
|                             | ) | <u>MINAS FLOROS</u>      |
| KISLING, NESTICO, & REDICK, | ) |                          |
| LLC, et al.,                | ) |                          |
|                             | ) |                          |
| Defendants.                 | ) |                          |

Now comes Affiant, Minas Floros, a Chiropractic Physician, having first been sworn upon his oath, and attests as follows:

- 1) I am of legal age, sound mind, and otherwise competent to testify.
- 2) This affidavit is based on my personal knowledge.
- 3) I am a licensed Chiropractic Physician in the State of Ohio and I am in good standing.
- 4) In the course of my practice, I have treated patients injured in automobile accidents represented by attorneys employed by Kisling, Nestico & Redick and other law firms.
- 5) That all patients, including patients represented by Kisling, Nestico and Redick at Akron Square Chiropractic clinic have their care determined solely by the chiropractor in charge.
- 6) Akron Square Chiropractic currently employs two chiropractors.
- 7) Based upon my professional chiropractic judgment, and only if I determine it is in the best interest of a given patient, I refer a small percentage of my patients to Dr. Sam Ghoubril or another medical doctor for medical consultation because the services a medical doctor can provide to help the patient heal faster are out of my professional scope of practice.

- 8) The reason for referring patients to Dr. Sam Ghoubril depended solely on the patient's medical conditions and needs.
- 9) At various times, based upon the medical condition of the clients, I would refer patients to one of a multitude of medical providers.
- 10) That the care provided by me, and/or my associates to the Member Williams et al. class members was different for each, to his own medical needs, based upon my education, training, and my professional judgment that such care was in their best interest.

FURTHER AFFIANT SAYETH NAUGHT.

  
Minas Floros, Chiropractic Physician

STATE OF OHIO )  
 ) SS:  
COUNTY OF \_\_\_\_\_ )

SWORN TO AND SUBSCRIBED in my presence by MINAS FLOROS,  
Chiropractic Physician this 12<sup>th</sup> day of June, 2019.

  
NOTARY PUBLIC



**SHAUN H. KEDIR**  
Attorney At Law  
**NOTARY PUBLIC**  
**STATE OF OHIO**  
My Commission Has  
No Expiration Date  
Section 147.03 O.R.C.