

EXHIBIT J

WILLIAMS, MEMBER
04/18/2018

Page 1

1 State of Ohio,)
County of Summit.) SS:

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IN THE COURT OF COMMON PLEAS

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MEMBER WILLIAMS, ET AL.,)

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Plaintiffs,)

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vs.)

Case No. CV-2016-09-3928

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KISLING, NESTICO & REDICK))

LLC, ET AL.,)

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Defendants.)

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- - - - -
THE VIDEOTAPE DEPOSITION OF MEMBER WILLIAMS
WEDNESDAY, APRIL 18, 2018
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The videotape deposition of MEMBER WILLIAMS,

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called by the Defendants for examination pursuant

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to the Ohio Rules of Civil Procedure, taken before

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me, the undersigned, Aimee N. Szinte, Notary Public

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within and for the State of Ohio, taken at

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Sutter O'Connell, 1301 East Ninth Street,

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3600 Erievue Tower, Cleveland, Ohio, commencing

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at 10:38 a.m., the day and date above set forth.

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WILLIAMS, MEMBER
04/18/2018

Page 65

1 retained by KNR have ever gone out and taken
2 pictures of damaged vehicles?
3 A Concerning me or just anybody?
4 Q Concerning anybody.
5 A No.
6 Q Do you know whether they've gone out and taken
7 pictures of clients to be used in the case?
8 A I have no clue.
9 Q Do you know whether they ever go and get
10 statements from witnesses?
11 A I have no idea.
12 Q All right. How did you come to retain KNR in
13 the first place for your initial case right
14 back at the beginning?
15 A Mike Mallis and Rob Horton had worked for
16 Perantinides & Nolan and did my mother's
17 lawsuit. And Jill Gardner worked there, who is
18 my daughter's mother-in-law, and so that's why
19 I went to them. I was in this little car
20 accident. I don't know if you guys want it.
21 It's nothing like my mother's was, but, you
22 know, I asked them.
23 Q All right. So the secretary there, that is
24 your --
25 A Well, she doesn't work there now.