

# EXHIBIT H

NORRIS, MONIQUE  
01/28/2019

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1                   COMMON PLEAS COURT OF THE STATE OF OHIO  
2                   IN AND FOR THE COUNTY OF SUMMIT  
3  
4   MEMBER WILLIAMS, et al.,  
5                   Plaintiffs,  
6                   vs.                                   JUDGE JAMES A. BROGAN  
7   CASE NO. CV-2016-09-3928  
8  
9   KISLING, NESTICO & REDICK  
10   LLC, et al.,  
11                   Defendants.

12  
13                   VIDEOTAPED DEPOSITION OF MONIQUE NORRIS  
14                   MONDAY, JANUARY 28, 2019  
15                   9:52 A.M.  
16                   DoubleTree by Hilton Hotel  
17                   3150 West Market Street  
18                   Fairlawn, Ohio

19  
20  
21   REPORTED BY:  
22   Sarah R. Drown

MONIQUE NORRIS  
January 28, 2019

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|--|---|
| <p style="text-align: right;">Page 13</p> <p>1 Q I'm sorry. Who said that?</p> <p>2 <b>A The investigator.</b></p> <p>3 Q You mean before he would talk to you --</p> <p>4 <b>A Yes.</b></p> <p>5 Q -- he wanted you to sign it?</p> <p>6 <b>A Yes. He told us we had to sign all of our</b></p> <p>7 <b>papers before we would discuss any of the</b></p> <p>8 <b>information.</b></p> <p>9 Q Any of what information?</p> <p>10 <b>A About our case.</b></p> <p>11 Q Okay.</p> <p>12 <b>A About anything that happened with the accident.</b></p> <p>13 Q You knew he was not a lawyer, correct, the one</p> <p>14 who came out to your house?</p> <p>15 <b>A Yes, but when I talked to the KNR</b></p> <p>16 <b>representative, Mr. Horton, he's the one who</b></p> <p>17 <b>told me that they would be sending someone to</b></p> <p>18 <b>our house --</b></p> <p>19 Q Okay.</p> <p>20 <b>A -- from their law firm. So I just thought</b></p> <p>21 <b>everybody was all together.</b></p> <p>22 Q Okay. I understand what you're saying on that,</p> <p>23 but --</p> <p>24 <b>A But as far as why I didn't feel comfortable</b></p> <p>25 <b>there is with everything with the case that's</b></p>   | <p style="text-align: right;">Page 15</p> <p>1 contingency fee agreement and you had agreed to</p> <p>2 it, correct, verbally?</p> <p>3 <b>A Yes.</b></p> <p>4 Q So you already -- they already knew once you</p> <p>5 signed they were going to represent you and you</p> <p>6 already knew you wanted them to represent you</p> <p>7 at the time the investigator came out, correct?</p> <p>8 <b>A Well, I told him -- what my exact words were, I</b></p> <p>9 <b>wanted to discuss if I wanted them to represent</b></p> <p>10 <b>us, but it ended up that's what happened.</b></p> <p>11 Q Okay. You're saying that you told Rob Horton</p> <p>12 that when the investigator came out to see</p> <p>13 you --</p> <p>14 <b>A Yes.</b></p> <p>15 Q -- that you wanted to talk to the investigator</p> <p>16 about whether KNR should represent you?</p> <p>17 <b>A Yes, because they were the ones that were</b></p> <p>18 <b>supposed to discuss what was going on with our</b></p> <p>19 <b>case, to find out if we had needed a lawyer, if</b></p> <p>20 <b>I wanted them to actually represent us. I was</b></p> <p>21 <b>under the impression that they were from KNR.</b></p> <p>22 Q Okay. That's a separate issue.</p> <p>23 Regardless of where they were from, my</p> <p>24 question to you is: You thought that the</p> <p>25 investigator who was going to come out was the</p> |
| <p style="text-align: right;">Page 14</p> <p>1 <b>going on currently. I just didn't want that,</b></p> <p>2 <b>that air. I just felt uncomfortable.</b></p> <p>3 Q When you first talked to the KNR representative</p> <p>4 who you believe was Rob Horton --</p> <p>5 <b>A Yes.</b></p> <p>6 Q And that would have been when you first called</p> <p>7 KNR?</p> <p>8 <b>A Yes.</b></p> <p>9 Q Anything about the conversation with Mr. Horton</p> <p>10 that made you feel uncomfortable?</p> <p>11 <b>A No.</b></p> <p>12 Q And he told you an investigator was coming out,</p> <p>13 correct?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Now, he didn't tell you it was a KNR employee</p> <p>16 or not a KNR employee, fair?</p> <p>17 <b>A No. He say it would be someone -- they would</b></p> <p>18 <b>send someone from their office out that evening</b></p> <p>19 <b>to come and talk to us about if we wanted them</b></p> <p>20 <b>to represent us.</b></p> <p>21 Q Okay. Now, he told you specifically that he</p> <p>22 was sending an investigator, correct?</p> <p>23 <b>A Yes.</b></p> <p>24 Q Okay. And you had already agreed on the phone</p> <p>25 with Mr. Horton -- he had gone over the</p> | <p style="text-align: right;">Page 16</p> <p>1 person who was going to talk to you about</p> <p>2 whether you should be represented by an</p> <p>3 attorney --</p> <p>4 <b>A Yes.</b></p> <p>5 Q -- and by KNR?</p> <p>6 <b>A Yes.</b></p> <p>7 Q And you didn't make that decision already when</p> <p>8 you talked to Rob Horton?</p> <p>9 <b>A No. I hadn't fully made the decision. I had</b></p> <p>10 <b>told him that.</b></p> <p>11 Q Okay. Why did you agree to have somebody come</p> <p>12 out, then?</p> <p>13 <b>A To discuss our accident.</b></p> <p>14 Q Okay. So I was going to start somewhere else,</p> <p>15 but let me just ask you this. I mean, tell me</p> <p>16 everything you remember about that first</p> <p>17 conversation with Rob Horton.</p> <p>18 <b>A As far as what?</b></p> <p>19 Q How it came about, who you talked to first,</p> <p>20 what was said, when it was.</p> <p>21 <b>A How it came about?</b></p> <p>22 Q Sure.</p> <p>23 <b>A My auntie recommended him to us.</b></p> <p>24 Q Who's your aunt?</p> <p>25 <b>A Carolyn Holsey.</b></p>  |