

# EXHIBIT F

REID, THERA  
07/03/2018

Page 1

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

12                    - - - - -  
13                    THE VIDEOTAPE DEPOSITION OF  
14                    THERA REID  
15                    TUESDAY, JULY 3, 2018  
16                    - - - - -

17           The deposition of THERA REID, called by the  
18   Defendants for examination pursuant to the Ohio  
19   Rules of Civil Procedure, taken before me, the  
20   undersigned, Margaret A. Trombetta, RMR and Notary  
21   Public within and for the State of Ohio, taken at  
22   the offices of Kisling, Nestico & Redick, LLC, 3412  
23   W. Market Street, Fairlawn, Ohio, commencing at  
24   10:30 a.m., the day and date above set forth.  
25

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<p style="text-align: right;">Page 101</p> <p>1 Q And you went to those visits with the 2 chiropractor because you believed you needed 3 that treatment, true? 4 <b>A True.</b> 5 Q You're not complaining about the treatment the 6 chiropractor gave you, are you? 7 <b>A No.</b> 8 Q Okay. When you went to the chiropractor the 9 first day, who did you see? 10 <b>A I believe his name was Mike.</b> 11 Q Mike what? Do you know? 12 <b>A No, I do not.</b> 13 Q Was it an assistant? Was it a chiropractor? 14 <b>A He was a chiropractor.</b> 15 Q Tell me about that visit. 16 <b>A It was just an initial visit. I went in and</b> 17 <b>signed some papers and we talked about what was</b> 18 <b>going to happen, about what my treatment plan</b> 19 <b>would be, about possible lawyer. And I said</b> 20 <b>"Okay, who would be the lawyer?"</b> 21 <b>And they said, "Well, our lawyer. Here's</b> 22 <b>the phone." And they called KNR.</b> 23 Q Before we get to the lawyer issue, had you ever 24 treated with a chiropractor in the past? 25 <b>A No.</b></p>	<p style="text-align: right;">Page 103</p> <p>1 chiropractor were you on the phone with an 2 attorney? 3 <b>A Within at least an hour, hour and a half maybe.</b> 4 Q Okay. Did they treat you first? 5 <b>A No, I didn't get treated that day.</b> 6 Q Talked to you first? 7 <b>A I got talked to, yes.</b> 8 Q And how long into the conversation was it 9 before discussion regarding an attorney came 10 up? 11 <b>A I would say probably about a half an hour</b> 12 <b>anyway. We were talking and he said something</b> 13 <b>about an attorney and we just kept talking a</b> 14 <b>little bit and then, like I said, probably</b> 15 <b>about an hour, hour and a half into it is when</b> 16 <b>he picked up the phone and called here.</b> 17 Q And you already knew that attorneys had already 18 been calling you, is that fair at that time? 19 <b>A Yeah, yes.</b> 20 Q And did you intend even before you went to the 21 chiropractor to try to retain an attorney to 22 help you with this accident? 23 <b>A Yes, I was thinking about it, yes.</b> 24 Q So the chiropractor didn't talk you into 25 getting an attorney in the abstract, but</p>
<p style="text-align: right;">Page 102</p> <p>1 Q They talked to you about what the treatment 2 plan would be though? 3 <b>A Yes.</b> 4 Q What did they say? 5 <b>A They said that there would be like a massage</b> 6 <b>table. There would be some kind of like a</b> 7 <b>shock, like a little electric shock, ice</b> 8 <b>treatment, heat treatment.</b> 9 Q Did it seem to help when you got that? 10 <b>A Somewhat, you know, a little bit it did.</b> 11 Q I mean, you would have stopped going if it 12 didn't help, true? 13 <b>A Correct.</b> 14 Q The reason you continued to go was because the 15 chiropractic treatment was effective for you? 16 <b>A Yes.</b> 17 Q The discussion regarding an attorney, how did 18 that come about? 19 <b>A They -- I don't know really. We were just</b> 20 <b>sitting there talking and he said something</b> 21 <b>about an attorney and had some papers on the</b> 22 <b>desk and said something about here, picked up</b> 23 <b>the phone, and said "talk to our attorney," and</b> 24 <b>had KNR on the phone.</b> 25 Q Within how long of first talking to Mike the</p>	<p style="text-align: right;">Page 104</p> <p>1 there's somebody that they recommended and that 2 was KNR? 3 <b>A Correct.</b> 4 Q Regardless of whether you went to the 5 chiropractor that day, your intention was to 6 talk with an attorney about taking your case? 7 <b>A Eventually, yes.</b> 8 Q Okay. And how many options were you provided? 9 <b>A Just the one.</b> 10 Q Okay. Did you ask whether they knew anybody 11 else? 12 <b>A No, I didn't.</b> 13 Q Did you ask -- 14 <b>A Because --</b> 15 Q Go ahead. 16 <b>A -- they had just picked up the phone and said</b> 17 <b>"here."</b> 18 Q Was this in the exam room, was this in a 19 conference room? 20 <b>A It was in his office.</b> 21 Q Okay. Did he talk with the lawyers from KNR 22 first before he handed you the phone? 23 <b>A Yes.</b> 24 Q Okay. What did you hear from his end of the 25 conversation?</p>

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Pages 101 to 104

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<p style="text-align: right;">Page 237</p> <p>1 sit here, you don't recall the date, correct?</p> <p>2 <b>A Not the exact date.</b></p> <p>3 Q Okay. What's your best estimate of the date as</p> <p>4 you sit here?</p> <p>5 <b>A I don't remember.</b></p> <p>6 Q Okay. If you turn the page, it says "Ms. Reid</p> <p>7 first contacted plaintiffs' counsel on March</p> <p>8 27, 2017 by telephone after having read about</p> <p>9 the case in the news."</p> <p>10 Did I read that correctly?</p> <p>11 <b>A Where are you?</b></p> <p>12 Q The answer to Interrogatory Number 26.</p> <p>13 <b>A I was just there.</b></p> <p>14 <b>Oh, yeah, yes.</b></p> <p>15 Q Okay. And by reading about the case in the</p> <p>16 news, what you mean is going to the Chandra</p> <p>17 link that then took you to the newspaper</p> <p>18 article?</p> <p>19 <b>A Yes.</b></p> <p>20 Q And if it wasn't for that link being on</p> <p>21 Facebook and you clicking on it, you would not</p> <p>22 be here as a plaintiff against my clients right</p> <p>23 now, fair?</p> <p>24 <b>A Probably not. I don't think I would have found</b></p> <p>25 <b>it.</b></p>	<p style="text-align: right;">Page 239</p> <p>1 Q You don't know one way or another?</p> <p>2 <b>A Exactly, and I never will.</b></p> <p>3 Q And you never had to give a deposition in the</p> <p>4 underlying case, did you, the accident case</p> <p>5 where Allstate paid you?</p> <p>6 <b>A No, I did not.</b></p> <p>7 Q Okay. A lawsuit wasn't even filed, was it?</p> <p>8 <b>A No.</b></p> <p>9 Q You were able to get that recovery without any</p> <p>10 of the things that are happening in this case</p> <p>11 like video discovery and complaints and all</p> <p>12 that, correct?</p> <p>13 <b>A Right.</b></p> <p>14 Q And you're glad for that, aren't you?</p> <p>15 <b>A Yeah.</b></p> <p>16 Q I mean, do you know if Allstate had hired a</p> <p>17 lawyer to defend the case against you that they</p> <p>18 would have looked into all the care and</p> <p>19 treatment and your background? Do you know</p> <p>20 that?</p> <p>21 <b>A Yes.</b></p> <p>22 Q And if they did all that, do you know whether</p> <p>23 they would have agreed to pay 45,000?</p> <p>24 <b>A I don't know.</b></p> <p>25 Q Okay. Now, KNR, and when I say "KNR," I'm</p>
<p style="text-align: right;">Page 238</p> <p>1 Q And you would have gone on and not had any</p> <p>2 stress at all about this \$150, true?</p> <p>3 <b>A Probably not.</b></p> <p>4 Q So would you have rather have had KNR pay the</p> <p>5 150 out of their own pocket, but not waive the</p> <p>6 \$333 from the thousand dollar MedPay?</p> <p>7 <b>A No.</b></p> <p>8 Q They treated you fairly, didn't they, ma'am?</p> <p>9 <b>A I guess to an extent.</b></p> <p>10 Q Well, other than the \$150 fee that you think</p> <p>11 should have been 85, was there anything else</p> <p>12 that KNR or their attorney did that you think</p> <p>13 was unfair to you?</p> <p>14 <b>A No.</b></p> <p>15 Q Okay. Are you claiming that some other lawyer</p> <p>16 somehow could have got more money for you?</p> <p>17 <b>A You know, I don't even know.</b></p> <p>18 Q Okay. So you're not making that claim, are</p> <p>19 you?</p> <p>20 <b>A No, I'm not because I don't even know. I never</b></p> <p>21 <b>went to another lawyer and talked to them.</b></p> <p>22 Q Okay.</p> <p>23 <b>A I should have, but I didn't.</b></p> <p>24 Q They may not have got as much for you?</p> <p>25 <b>A It's a possibility.</b></p>	<p style="text-align: right;">Page 240</p> <p>1 including the lawyers there, Matt Walker or any</p> <p>2 of the others, they never pressured you into</p> <p>3 unwanted medical care, did they?</p> <p>4 <b>A No.</b></p> <p>5 Q They never pressured you into unwanted</p> <p>6 chiropractic care, did they?</p> <p>7 <b>A No.</b></p> <p>8 Q Okay. So if we look at your answer to</p> <p>9 Interrogatory Number 29, and before you told me</p> <p>10 that the conflicted legal representation was</p> <p>11 your own internal conflict because you were</p> <p>12 vulnerable or whatever the words are you used,</p> <p>13 but that's not the answer you gave when you</p> <p>14 were under oath answering these</p> <p>15 interrogatories, is it? Would you agree your</p> <p>16 answer to Interrogatory Number 29 is completely</p> <p>17 different from what you told me before about</p> <p>18 conflicted local representation?</p> <p>19 <b>A Yes.</b></p> <p>20 Q And your answer to Interrogatory Number 29, it</p> <p>21 indicates "pressuring clients into unwanted and</p> <p>22 unneeded chiropractic care."</p> <p>23 And you've already told us they didn't do</p> <p>24 that to you. Do you know anybody they did do</p> <p>25 that too?</p>

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Pages 237 to 240

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<p style="text-align: right;">Page 241</p> <p>1 <b>A I'm unsure.</b></p> <p>2 Q Why would you sign something saying that they</p> <p>3 pressured clients into unwanted and unneeded</p> <p>4 chiropractic care if you didn't know?</p> <p>5 <b>A I was talking to my attorney.</b></p> <p>6 Q Okay. Then it says "Failing to advise clients</p> <p>7 of fraud lawsuits by major insurance companies</p> <p>8 against certain chiropractors."</p> <p>9 What "fraud lawsuits" are you referring</p> <p>10 to?</p> <p>11 <b>A I was talking to my attorney.</b></p> <p>12 Q No, but which fraud lawsuits are you referring</p> <p>13 to?</p> <p>14 <b>A This one here.</b></p> <p>15 Q This says "by major insurance companies."</p> <p>16 Are there any insurance companies who are</p> <p>17 party to this case? You can look at the</p> <p>18 complaint again if you want. That's the</p> <p>19 discovery. You can look at Exhibit 4 is the</p> <p>20 Third Amended Complaint and tell me if you see</p> <p>21 any insurance companies who are parties.</p> <p>22 <b>A Oh, for heaven's sake. There's so many in here</b></p> <p>23 <b>now.</b></p> <p>24 Q Okay. Go take a look.</p> <p>25 <b>A No. Third parties.</b></p>	<p style="text-align: right;">Page 243</p> <p>1 Q I'm sorry?</p> <p>2 <b>A Claiming the kick-backs.</b></p> <p>3 Q That's what the fraud lawsuits are against the</p> <p>4 certain chiropractors?</p> <p>5 <b>A I believe, yes.</b></p> <p>6 Q Okay. Where were these lawsuits at?</p> <p>7 <b>A I do not know.</b></p> <p>8 Q What about which insurance companies filed</p> <p>9 them? Do you know?</p> <p>10 <b>A I'm not sure.</b></p> <p>11 Q Would that have made any difference to your</p> <p>12 case?</p> <p>13 <b>A I'm unsure.</b></p> <p>14 Q At the top of your answer there, you say "The</p> <p>15 defendants maintain unlawful quid pro quo</p> <p>16 relationships with chiropractors."</p> <p>17 What do you mean by that?</p> <p>18 <b>A Just seems like they have the my-hand-washes-</b></p> <p>19 <b>your-hand-type relationship.</b></p> <p>20 Q That's pretty general. What specifically --</p> <p>21 <b>A Okay.</b></p> <p>22 Q -- is the quid pro quo relationship?</p> <p>23 <b>A I will give you -- I will give you -- oh, my</b></p> <p>24 <b>goodness gracious.</b></p> <p>25 Q You understand you're suing my clients and</p>
<p style="text-align: right;">Page 242</p> <p>1 Q Are there any insurance companies listed as</p> <p>2 plaintiffs in that case, in your case?</p> <p>3 <b>A No.</b></p> <p>4 Q So what fraud lawsuits by major insurance</p> <p>5 companies against certain chiropractors are you</p> <p>6 referring to?</p> <p>7 <b>A I said I was talking to my attorney.</b></p> <p>8 Q Well, I'm not asking where you got the</p> <p>9 information from. I'm saying what fraud</p> <p>10 lawsuits are you talking about?</p> <p>11 <b>A I don't know.</b></p> <p>12 Q Do you know of any fraud lawsuits against</p> <p>13 certain chiropractors?</p> <p>14 The answer is no, isn't it?</p> <p>15 <b>A Yes.</b></p> <p>16 Q Okay. Which "certain chiropractors" are you</p> <p>17 referring to? Do you even know?</p> <p>18 <b>A The only one I would be referring to would be</b></p> <p>19 <b>the one I'm -- Akron Square.</b></p> <p>20 Q Okay. And do you have any idea as you sit here</p> <p>21 now what these fraud lawsuits allegedly claim?</p> <p>22 <b>A Oh, my word.</b></p> <p>23 Q Ma'am, these are your answers. I'm asking what</p> <p>24 you meant by them.</p> <p>25 <b>A Claiming the kick-backs.</b></p>	<p style="text-align: right;">Page 244</p> <p>1 asking them for money, correct?</p> <p>2 Ma'am?</p> <p>3 <b>A Yes.</b></p> <p>4 Q In fact, you're asking them for money for all</p> <p>5 sorts of different people that we don't even</p> <p>6 know their names yet, correct?</p> <p>7 <b>A And I am trying my best, okay, I have medical</b></p> <p>8 <b>conditions and I am trying my best to fight</b></p> <p>9 <b>through this right now.</b></p> <p>10 Q Okay. What medical conditions do you have that</p> <p>11 are preventing you or causing you to have to</p> <p>12 fight through this?</p> <p>13 <b>A I don't want to bring that. Just let me deal</b></p> <p>14 <b>with this, please.</b></p> <p>15 Q Well, if I was a potential member of the class,</p> <p>16 do you think I'd have a right to know whether</p> <p>17 you have any medical conditions that might</p> <p>18 impact your ability to be my representative?</p> <p>19 THE WITNESS: You might want</p> <p>20 to get another head of the class, Peter.</p> <p>21 Seriously, I'm done.</p> <p>22 MR. PATTAKOS: There are</p> <p>23 plenty of them out there so okay.</p> <p>24 THE WITNESS: I'm done.</p> <p>25 MR. MANNION: Move to strike</p>

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