

EXHIBIT N

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.)	<i>Affidavit of Alberto Nestico, Esq.</i>
)	
KISLING, NESTICO, & REDICK,)	
LLC, et al.,)	
)	
Defendants.)	

Now comes Affiant Alberto Nestico, 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. I am a licensed Attorney in Ohio in Good Standing.
3. I am licensed to practice in all Ohio courts, the Sixth Circuit Court of Appeals, the Northern Federal District of Ohio and the United States Supreme Court.
4. This affidavit is based on my personal knowledge.
5. Kisling, Nestico and Redick rarely refers clients to Dr. Sam Ghoubrial. In fact, KNR refers on average two or less (2) cases per year to Dr. Sam Ghoubrial.
6. Kisling, Nestico and Redick refers clients to over a dozen chiropractors who refer patients to Dr. Sam Ghoubrial.
7. Kisling, Nestico and Redick plays no role in the decision as to whether a chiropractor refers a patient to Dr. Ghoubrial.
8. During the class period, less than fifteen percent (15%) of Kisling, Nestico and Redick's clients were treated by Dr. Sam Ghoubrial.
9. The vast majority of Dr. Sam Ghoubrial's medical billings regarding Kisling, Nestico and Redick clients are negotiated and discounted between 0% to 98% by the attorneys handling the cases.
10. During certain times the reimbursement determination and negotiation with Dr. Sam Ghoubrial was made by individual Kisling, Nestico and Redick lawyers. At other

times, negotiations were done by me after consultation and input from the lawyers handling those cases.

11. To my knowledge, Dr. Sam Ghoubril had formed his personal injury practice and accepted chiropractor referrals long before Kisling, Nestico and Redick ever referred him a patient.
12. Approximately one-third (1/3) of Kisling Nestico and Redick's business derives from chiropractors, one-third (1/3) from direct marketing and one-third (1/3) from client referrals.
13. During the class period, Kisling Nestico and Redick has referred cases to over one hundred (100) different chiropractic offices.
14. Referrals are made to chiropractic physicians by KNR lawyers for a variety of reasons, including but not limited to: (a) some clients do not have principal care physicians; (b) many clients have principal care physicians that choose not to treat injury victims; (c) chiropractors are readily willing to author report(s) and/or give trial testimony; (d) chiropractors are more apt to find proximate cause between a trauma and the treatment and support the care as it relates to an automobile accident; (e) some clients prefer a holistic non-invasive approach, (f) chiropractors will often not harass clients for payment until the case is resolved; (g) chiropractors are generally faster to begin treatment, as p c p's sometimes require weeks to get appointments; (h) chiropractors are more likely to negotiate their bills to facilitate settlement; (i) some clients are not interested in pain pills or anti-inflammatory pills as treatment; (j) chiropractors are good to refer to appropriate specialists when necessary; (i) chiropractors more often understand the claims process; (j) better documentation of injuries and pain and suffering; (k) some lawyers find chiropractic treatment personally beneficial and thus advocate it for clients; (l) past chiropractic success with this client; (m) client requested a chiropractor; (n) traditional medicine has not been beneficial for this client in past; (o) client did not want to pay copays for treatment or bill their own health insurance; (p) more reasonable testimony rates beneficial to soft tissue clients; (q) better bedside manners; (r) more convenient location to client; (s) chiropractors keep unconventional hours that benefit many clients; (t) for clients with transportation issues, many

- chiropractors will accommodate; (u) some attorneys at KNR believe client satisfaction is higher with chiropractic treatment.
15. Kisling, Nestico and Redick's attorneys refer clients to a large number of physicians, in addition to chiropractors, including but not limited to family doctors, rehabilitation specialists, physical therapists, orthopedic surgeons, plastic surgeons, podiatrists, neurologists, neurosurgeons, psychologists and psychiatrists.
16. A review of the class representatives' individual medical reports and medical records indicate no attorney ordered medical narrative reports until the client was finished treating.
17. At various times, between ten (10) and twelve (12) investigators have provided services to Kisling, Nestico and Redick. Four of the investigators are retired police officers.
18. The investigator fees paid by KNR to the investigators is a pass through expense.
19. A review of the records of class representatives shows Dr. Floros provided no care in five (5) of the seven (7) personal injury cases Kisling, Nestico and Redick pursued on behalf of the four (4) class representatives.
20. Kisling, Nestico and Redick reduces its fee in 75% to 80% of all of its personal injury cases.
21. Some class members had had their cases tried before a jury where Dr. Sam Ghoubril testified live or by deposition.
22. It is my estimate that a significant number of individuals we have represented since 2010 have no health insurance.
23. Some clients voluntarily forego billing their own medical insurance coverage for fear it will affect their premiums and other reasons.

FURTHER AFFIANT SAYETH NAUGHT.

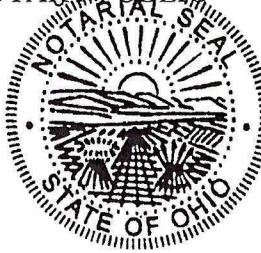


Alberto Nestico

STATE OF OHIO)
) SS:
 COUNTY OF Summit)

14th SWORN TO AND SUBSCRIBED in my presence by, Alberto Nestico, Esq. this
 day of June, 2019.

Angela Simonyi

 NOTARY PUBLIC

 ANGELA SIMONYI
 NOTARY PUBLIC
 FOR THE
 STATE OF OHIO
 My Commission Expires
 May 26, 2024