

EXHIBIT K

LANTZ, ESQ., AMANDA
03/28/2019

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1 State of Ohio,)
2 County of Summit.) SS:
3 IN THE COURT OF COMMON PLEAS
4 MEMBER WILLIAMS, ET AL.,)
5)
6 Plaintiffs,)
7 vs.) Case No. CV-2016-09-3928
8)
9 KISLING, NESTICO & REDICK)
10 LLC, ET AL.,)
11)
12 Defendants.)
13 - - - - -
14 THE VIDEOTAPED DEPOSITION OF AMANDA LANTZ, ESQ.
15 THURSDAY, MARCH 28, 2019
16 - - - - -
17 The videotaped deposition of AMANDA LANTZ,
18 ESQ., called by the Defendants for examination
19 pursuant to the Ohio Rules of Civil Procedure,
20 taken before me, the undersigned, Aimee N. Szinte,
21 Notary Public within and for the State of Ohio,
22 taken at Kisling, Nestico & Reddick,
23 3412 West Market Street, Fairlawn, Ohio, commencing
24 at 10:14 a.m., the day and date above set forth.
25

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1 Q Do you know if Dave was an independent
2 contractor or an employees of Kurgis?
3 A I have no idea. I wasn't there for very long.
4 Q How long were you there?
5 A I would say maybe four months.
6 Q All right. I'm going to ask you about some of
7 the -- any information you may know about the
8 actual plaintiffs in this case.
9 When you were here at this firm, did you
10 work on a case involving a client named
11 Member Williams?
12 A I did not.
13 Q Are you even aware that she's a plaintiff in
14 this case?
15 A I am just from correspondence I've seen.
16 Q Okay.
17 A I read the KNR complaint from I think -- or the
18 complaint against KNR from I think 2016 and I
19 think I saw some of the names. Some of them
20 that you had asked in your subpoena, they
21 didn't ring a bell.
22 Q All right. So you don't have any personal
23 knowledge as to how she was signed up --
24 A No.
25 Q -- at KNR?

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1 A No.
2 Q You don't know which attorneys were working on
3 her case?
4 A No idea.
5 Q Do you know have any personal knowledge of what
6 work any investigator may have done on her
7 case?
8 A No.
9 Q For example, you wouldn't know who obtained the
10 police report?
11 A I don't.
12 Q You don't know what was said to her by any
13 KNR attorney during her initial consultation?
14 A I don't.
15 Q Or at the disbursement meeting?
16 A None.
17 Q Or any time in between, correct?
18 A Correct.
19 Q You don't know whether she was given a
20 recommendation for a chiropractor or who she
21 was recommended to see?
22 A Correct. I don't know.
23 Q Or whether the attorney discussed Dr. Ghoubrial
24 with her?
25 A Correct.

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1 Q You don't know whether she had a loan on her
2 case, correct?
3 A I don't know.
4 Q Or what loan company information the KNR
5 attorney may have given to Member Williams,
6 correct?
7 A That's correct.
8 Q And if we can do this as quickly as we can, the
9 other -- one of the other plaintiff's names is
10 Thera Reid. Would the answers that you gave me
11 for Member Williams be the same for Thera Reid?
12 Do you have any personal knowledge regarding
13 her case?
14 A No. It sounded familiar, but I think there's a
15 celebrity named Thera Reid. That's all I can
16 relate it to.
17 MR. PATTAKOS: It's Thera.
18 A Absolutely not. Never heard that name before.
19 Q Okay. Do you have any personal knowledge
20 regarding the handling of the case by KNR of a
21 client named Monique Norris?
22 A No.
23 Q Do you have any personal knowledge of the
24 handling of the case of a KNR client by the
25 names of James Harbour?

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1 A No.
2 MR. PATTAKOS: Richard.
3 Q You know why I said James Harbour? Because my
4 stepmother's brother is named James Harbour.
5 A Him either.
6 Q How about that?
7 For example, do you know how Richard
8 Harbor became a patient of Dr. Ghoubrial at any
9 time related to any of his four different
10 lawsuits that he had?
11 A No.
12 Q You do not know if any KNR attorney referred
13 Richard Harbour to Dr. Ghoubrial, do you?
14 A No, I don't.
15 Q In order for us -- in order for anyone to know
16 that, you would have to review the files to
17 know what happened in their individual cases.
18 Do you agree with that?
19 A I do agree.
20 Q We could talk to the chiropractor who may have
21 referred the patient to Dr. Ghoubrial to find
22 out how the person got to Dr. Ghoubrial?
23 A You could.
24 Q We could talk to the lawyers who actually
25 handled the case and find out what they

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<p style="text-align: right;">Page 25</p> <p>1 and tell the chiropractor, "You need to send 2 this client to see Dr. Ghoubrial", did you? 3 A Sometimes we would. Sometimes we would get on 4 the phone with Ann Marie. She was really 5 directed. So we would say, "Hey, this patient 6 won't treat there, but they want to see an 7 M.D." And then she would say, "Okay. Amanda, 8 we'll take care of it." 9 And somehow -- I don't know. I can't 10 remember specifically if they would close them 11 as a client and keep them as a patient going 12 forward. 13 Q That's a little bit different. You would 14 communicate to Town & Country what your client 15 had communicated to you, that they didn't want 16 -- that they told you, even though you had 17 referred them over to Town & Country, they 18 didn't want to see the chiropractor. They 19 wanted to see a doctor, correct? 20 A Right. 21 MR. PATTAKOS: Objection. 22 A Correct. 23 Q So you're communicating to Town & Country the 24 information your client gave you, correct? 25 A Correct.</p>	<p style="text-align: right;">Page 27</p> <p>1 them from doing that, would you? 2 A No. 3 Q And if the client didn't want to treat at 4 Town & Country or didn't want to treat with 5 Dr. Ghoubrial, would you make them an 6 alternative recommendation? 7 A Very coyly, yes. Absolutely. In the Columbus 8 office, yes. 9 Q Go ahead. 10 A I encouraged them to try to get into their own 11 PCP, because that would be continuing care. 12 And I noticed with settling cases, it didn't 13 raise quite a concern if the patients, our 14 clients, went back to their own family doctor 15 to get evaluated. However, the direction at 16 the Columbus firm was if our client wanted an 17 M.D., send them to Gubs. Because Gubs charges 18 a lot more for his treatment, which means it 19 increase the value of the case. 20 So -- and that's where I butted heads 21 sometimes with Paul Steele because he said, 22 "We need to get cases into Gubs. It increase 23 the value, period." 24 So I still -- but I was the one settling 25 the cases and dealing with these adjusters who</p>
<p style="text-align: right;">Page 26</p> <p>1 Q And then, after that, it's up to Town & Country 2 if they're going to send that person to see 3 Dr. Ghoubrial? They may decide they're not 4 going to. 5 A Maybe. Right. They could kick them out if 6 they wanted to. 7 Q Can you name me -- sure. They can do whatever 8 they want. That's their decision, correct? 9 A Right. 10 Q Can you name for me any case, the name of any 11 client where you specifically referred them to 12 Dr. Ghoubrial? 13 A Gosh, no. If you asked me to name two clients 14 that I ever settled a case on or dealt with a 15 case, I couldn't name any off the top of my 16 head right now. 17 Q If your client wanted to see a medical doctor 18 at the emergency room, you wouldn't stop them, 19 would you? 20 A No. 21 Q Or advise them not to? 22 A No. 23 Q Or any other medical doctor -- 24 A Right. 25 Q -- if they wanted to see, you wouldn't stop</p>	<p style="text-align: right;">Page 28</p> <p>1 said, "Well, it's kind of suspicious that 2 Ghoubrial is coming up on all of these cases 3 when these clients have never treated with him 4 in the past." I never had any pushback when 5 clients would go to their own PCP to follow up 6 after an auto accident. 7 So yeah. I would -- typically my phone 8 calls with clients at certain points would be 9 if your injuries are not getting better with 10 just regular chiro treatment, then go to your 11 family doctor. 12 Now, if they had issues getting into 13 their family doctor, there was a place in 14 Columbus on the east side called Lower Lights 15 Christian Center. It's an office of family 16 physicians, but they take Medicaid, Care Source 17 and they will take -- I mean they will take 18 private pay as well, but they will take -- a 19 lot of our clients had Care Source, so they 20 would not have an issue seeing them. 21 Q Okay. If we wanted to know what happened on 22 any individual case as to how the patient ended 23 up seeing Dr. Ghoubrial, we would have to pull 24 that file and look at it? 25 A I would say so.</p>