

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

<p>MEMBER WILLIAMS, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>KISLING, NESTICO & REDICK, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 2016-CV-09-3928</p> <p>Judge James A. Brogan</p> <p>DEFENDANT MINAS FLOROS' BRIEF IN RESPONSE TO THE COURT'S MAY 22, 2019 SHOW CAUSE ORDER</p>
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Now Comes Defendant Minas Floros, through counsel, in response to this Court's May 22, 2019 Order directing the parties to show cause why prior depositions that have been filed in this matter should not be unsealed.

Floros has only requested that a limited amount of testimony be sealed, which involves his private financial information. Specifically, Floros has requested that his testimony on pages 220-232 of transcript and the corresponding Exhibits (ASC's W-2s) be sealed. Floros' counsel requested that this testimony would be sealed at the time of the questioning and in follow-up email. At no time has Plaintiff opposed this request.

Moreover, the Ohio Supreme has previously recognized the expectations of privacy that people have with respect to their tax returns and personal financial information. *State ex rel. Fisher v. Cleveland*, 109 Ohio St.3d 33, 2006-Ohio-1827, 845 N.E.2d 500, ¶ 27, 32. ("tax returns reflect intimate, private details of an individual's life," and citizens have an expectation of privacy with respect to their tax returns.). *Mezatasta v. Ent. Hill Farm*, 6th Dist. Erie No. E-15-037, 2016-Ohio-3371, ¶ 18.

In the end, a private individual should not have to disclose to the public his salary and tax returns. This information is private and personal. Floros, therefore, respectfully requests that this Court keep this information sealed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Counsel served a copy of DEFENDANT MINAS FLOROS' BRIEF IN RESPONSE TO THE COURT'S MAY 22, 2019 SHOW CAUSE ORDER was electronically filed on this 17th day of June, 2019. The parties will receive notice of this filing Notice of this filing by operation of the Court's electronic filing system.

/s/ Shaun H. Kedir
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