

**IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO**

MEMBER WILLIAMS, et al.,  Plaintiffs,  vs.  KISLING, NESTICO & REDICK, LLC, <i>et al.</i> ,  Defendants.	Case No. CV-2016-09-3928  Judge James A. Brogan  <b>Notice and Motion re: July 30, 2019 Hearing re: Defendants' Improper Communications with Represented Third Parties</b>
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Former KNR client Taijuan Carter—Defendants' improper contact with whom is the subject of Plaintiffs' April 18, 2019 motion for a protective order and sanctions—has recently relocated to Memphis, Tennessee, where he is currently employed full-time by the Memphis Area Transit Authority in a position that he recently obtained.

Mr. Carter has recently informed Plaintiffs' counsel that due to his need to remain in Memphis for his job, it is not practicable for him to travel to Akron to participate in person at the hearing on Plaintiffs' motion that is currently scheduled for 10:00 AM on July 30, 2019. Further, due to a scheduled training session at his job, Mr. Carter is only able to participate in the hearing by telephone or a video call from between 1PM and 2PM Eastern Standard Time (noon to 1PM Memphis time) on the scheduled date.

Because Mr. Carter is willing and able to participate by telephone or a video call at 1PM on the scheduled date, and because Plaintiffs are unable to otherwise compel his appearance, Plaintiffs hereby request that the hearing be postponed by 3 hours until 1PM on July 30, with Mr. Carter to participate remotely in the presence of a notary public authorized to administer oaths in Tennessee who will administer and certify his oath and separately record his personal participation in the hearing, with such certification and record to be filed with this Court immediately after the hearing.

Respectfully submitted,

/s/ Peter Pattakos

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### **Certificate of Service**

The foregoing document was filed on July 24, 2019, using the Court's e-filing system, which will serve copies on all necessary parties.

/s/ Peter Pattakos

*Attorney for Plaintiffs*