

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

MEMBER WILLIAMS, *et al*,

Case No. 2016-CV-09-3928

Plaintiffs,

Judge James A. Brogan

vs.

KISLING, NESTICO & REDICK, LLC, *et al.*,

**DEFENDANTS' JOINT MOTION FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' SUPPLEMENT TO
MOTION FOR CLASS ACTION
CERTIFICATION OF CLASS A**

Defendants

Now come Defendants, Kisling, Nestico & Redick, Alberto Nestico, Robert Redick, and Samuel Ghoubrial, and hereby move this Court for a day extension of time to respond to Plaintiffs' Supplement to Motion for Class Action Certification of Class A ("Supplement"). The Court initially allowed Plaintiffs 14 days from the date of the Court's most recent hearing on November 9, 2022, to submit its Supplement. Plaintiffs sought and received two additional extensions of time ultimately permitting Plaintiffs until December 9, 2022, or 30 days, to submit their Supplement. Due to preparations now occurring over the holiday season and the need to research and analyze new case law raised in Plaintiffs' Supplement, Defendants respectfully request a 14-day extension (until January 6, 2023) to respond to Plaintiffs' Supplement. Defense counsel contacted Plaintiffs' counsel regarding this request prior to filing the instant motion. Plaintiffs' counsel stated he had no objection to Defendants' Motion. Thus, no parties will be prejudiced by the granting of this extension of time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The foregoing motion was filed electronically with the Court this 12th day of December, 2022. The parties may access this document through the Court's electronic docket system.

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