

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

**MEMBER WILLIAMS, et al.**

**Plaintiffs,**

**vs.**

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

**Defendants.**

**CASE NO: CV-2016-09-3928**

**JUDGE JAMES BROGAN**

**MOTION FOR LEAVE TO FILE MOTION  
TO QUASH ON BEHALF OF THIRD-  
PARTY JULIE GHOUBRIAL**

Third-party Julie Ghoubrial respectfully requests leave to file the attached Motion to Quash Plaintiff's Subpoena.

For cause, the undersigned was only recently retained more than 14 days after Julie Ghoubrial was served with a subpoena on April 25, 2025. The history of the discovery dispute spanned more than five years, and the undersigned was required to review years of docket entries and analyze over 80 separate filings in order to become adequately familiar with the dispute surrounding Plaintiffs' subpoena of Julie.

Furthermore, Civ.R. 45 requires the undersigned to contact Plaintiff in an attempt to meet and confer surrounding the subpoena issues. The undersigned left a message for Attorney Pattakos today, May 16<sup>th</sup>, but has not received a return call as of this filing. Julie is prepared to immediately file a Motion to Quash without delay following the meet and confer if unsuccessful.

No party will be prejudiced by this very brief delay. Julie's response to the subpoena is not yet due, the hearing is not scheduled until June 10<sup>th</sup>, the undersigned will not seek to delay

the hearing, and Sam Ghoubril has already filed a Motion to Quash Julie's subpoena based upon the assertion of his own spousal privilege.

For all of these reasons, Julie Ghoubril requests leave to file a slightly delayed Motion to Quash *instantly* in the event she is unable to reach a compromise with Plaintiff's counsel.

Respectfully Submitted,

**PLAKAS MANNOS**

/s/ Kristen S. Moore

Kristen S. Moore (0084050)

200 Market Avenue North

Suite 300

Canton, OH 44702

Tele: (330) 455-6112

Fax: (330) 455-2108

E-Mail: [kmoore@lawlion.com](mailto:kmoore@lawlion.com)

*Attorney for Third-Party Julie Ghoubril*

**NOTICE OF SERVICE**

A copy of the foregoing was filed and served electronically on the 16th day of May, 2024 through the Clerk's electronic filing system.

/s/ Kristen S. Moore

Kristen S. Moore (0084050)

*Attorney for Third-Party Julie Ghoubril*