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

MEMBER WILLIAMS, et al.,

Plaintiffs,

vs.

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

Defendants.

Case No. CV-2016-09-3928

Judge James A. Brogan

Plaintiffs' Motion for Extension of Time to Respond to Defendant Sam Ghoubrial M.D.'s Motion to Quash Subpoena Served to Julie Ghoubrial

Plaintiffs hereby respectfully request an extension, to June 3, 2024, of the deadline by which to respond to *Defendant Sam Ghoubrial*, *M.D.'s Motion to Quash Subpoena Served to Julie Ghoubrial*, filed on May 10, 2024. While Sam's motion was pending, Julie Ghoubrial retained new counsel, and on May 20, 2024, she filed her own motion to quash the same subpoena. Plaintiffs' response to Julie's motion to quash is currently due on or before June 3, 2024. Both motions to quash raise similar issues, and allowing Plaintiffs to respond to both in a combined response would promote judicial economy. No previous extension has been requested or granted, and Plaintiffs submit that the extension requested herein will not prejudice any party to this case.

Respectfully submitted,

/s/ Peter Pattakos

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## **Certificate of Service**

The foregoing document was filed on May 24, 2024, using the Court's e-filing system, which will serve copies on all necessary parties.

/s/ Peter Pattakos Attorney for Plaintiffs