IN THE COURT OF COMMON PLEAS STARK COUNTY, OHIO

MEMBER WILLIAMS, et al.

CASE NO: CV-2016-09-3928

Plaintiffs,

JUDGE JAMES BROGAN

THIRD PARTY JULIE GHOUBRIAL'S

MFET

vs.

KISLING, NESTICO & REDICK, LLC, et al.

MOTION FOR EXTENSION FOR POST-HEARING BRIEF

Defendants.

Now comes third party Julie Ghoubrial, and respectfully requests that this Honorable Court extend the time in which she has to file her post-hearing brief until **July 11, 2024.**

For cause, on Thursday, June 20th, Ms. Ghoubrial's counsel received communication from court reporter Ms. Jacey Samic that the transcript for the June 10, 2024 hearing was ready. Ms. Ghoubrial's portion of the court reporter fees was promptly paid.

The undersigned followed up with Ms. Samic today regarding whether the transcript could be released so that Ms. Ghoubrial's post-hearing brief could be filed tomorrow, but was informed that no other party has yet paid the transcript fee and the transcript cannot be made available until all do so.

The undersigned leaves for an international vacation flying out tomorrow evening, June 25, 2024 and returning Sunday, July 7, 2024. This potential conflict was mentioned during the June 10th hearing.

Accordingly, Ms. Ghoubrial requests an extension to file her post-hearing brief on or before **July 11, 2024.** A proposed order is attached for the Court's convenience.

DATED: June 24, 2024

Respectfully Submitted,

PLAKAS MANNOS

/s/ Kristen S. Moore

Kristen S. Moore (0084050) 200 Market Avenue North Suite 300

Canton, OH 44718 Tele: (330) 455-6112 Fax: (330) 455-2108

E-Mail: kmoore@lawlion.com

Attorney for Third-Party Julie Ghoubrial

NOTICE OF SERVICE

A copy of the foregoing was filed and served electronically on the 24th day of June, 2024 through the Clerk's electronic filing system.

/s/ Kristen S. Moore

Kristen S. Moore (0084050) Attorney for Third-Party Julie Ghoubrial