FILED
COURT OF CLAIMS
OF OHIO
2007 OCT 11 AM 9:32

IN THE COURT OF CLAIMS OF OHIO

Eugene Wrinn, Jr.,	)	Case No. 2006-05934
Plaintiff,	)	Judge J. Craig Wright
v.	)	**NOTICE OF DEPOSITION**
Ohio State Highway Patrol	)	
Defendant.	)	ORIGINAL

Please take notice that on Tuesday, October 16, 2007 at 9:00 a.m., counsel for plaintiff will continue to take the deposition of **Lieutenant Steven Rine,** or other designees with the authority to testify on behalf of the Ohio State Highway Patrol as to matters known or available to the organization, at the Ohio State Highway Patrol Academy, 740 E. 17th Avenue, Columbus, OH 43211. The deposition will be taken in accordance with the Ohio Rules of Civil Procedure. See attached Schedule A for a list of the matters on which examination is requested. Civ. R. 30(B)(5).

You are invited to attend and take such part in the examination as you may be advised and shall be fit and proper.

Respectfully submitted,

Cary R. Cooper (0013062)
Sarah K. Skow (0081468)
COOPER & WALINSKI, LPA
900 Adams St.
Toledo, OH 43604
Phone: 419-241-1200
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900 ADAMS STREET
TOLEDO, OHIO 43624

ON COMPUTER

Schedule A

Per Civ. R. 30(B)(5), plaintiff requests to depose Lieutenant Steven Rine, or other designees of the Ohio State Highway Patrol, on its policies and procedures regarding:

- Anger management courses and requirements
- Disciplinary actions and penalties taken against employees
- Rules and regulations about conduct unbecoming an officer
- Citizen complaints
- Internal memoranda and notes taken at crash sites
- Flashlight use
- Taser use
- The Response Resistance Committee, investigating, and reporting
- Foot pursuits; and
- Training courses on:
    - Inservices
    - Self-defense
    - Note-taking
    - Non-violent and hostile accident victims
    - Crash investigations and reports
    - Dealing with difficult people
    - Dealing with injured persons
    - ASP expandable baton use
    - Supervisory skills
    - Subject control techniques
    - Assisting special needs

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing was sent to the parties listed below via ordinary U.S. mail, postage prepaid, this 26th day of September, 2007.

James P. Dinsmore
Assistant Attorney General
Court of Claims Defense Section
150 East Gay St., 23rd Floor
Columbus, OH 43215-3130

A copy of the foregoing was also sent to:

Anthony Geiger, Esq.
Law Director, City of Lima
209 N. Main St., 6th Floor
Lima, Ohio 45901
Counsel for the City of Lima

Todd M. Raskin, Esq.
100 Franklin's Row
34305 Solon Road
Cleveland, OH 44139
Counsel for Allen County

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September 26, 2007

Court of Claims of Ohio
The Ohio Judicial Center
65 South Front St., Third Fl.
Columbus, OH 43215

Re: Eugene Wrinn, Jr. v. Ohio State Highway Patrol

Dear Sir or Madam:

Enclosed for filing are an original and three copies of a Notice of Deposition in the above-captioned case. Please file same and return any unused file-stamped copies to me in the enclosed self-addressed, stamped envelope. If you have any questions, please contact me.

Thank you.

Sincerely,

Sarah Skow

Sarah K. Skow (dk)

SKS/dk

Enc
cc: James P. Dinsmore, Assistant Attorney General (w/enc)
Anthony Geiger, Esq. (w/enc)
Todd Raskin, Esq. (w/enc)

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