

2009 APR 27 AM 9:47

IN THE COURT OF CLAIMS OF OHIO

ORIGINAL

Eugene Wrinn, Jr.,

Plaintiff,

v.

Ohio State Highway Patrol,

Defendant.

) Case No. 2006-05934
)
) Judge J. Craig Wright
)
) **NOTICE OF DEPOSITION UNDER CIVIL**
) **RULE 30(B)(5)**
)
)
)

PLEASE TAKE NOTICE that on **Monday, June 8, 2009, at 9:00 a.m.**, counsel for Plaintiff will take the deposition of designee(s) 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, Ohio 43211.** The deposition will be taken in accordance with the Ohio Rules of Civil Procedure. See Schedule A (attached) 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.

Dated: April 23, 2009

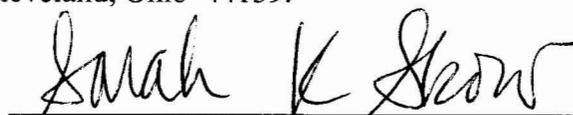
Respectfully submitted,



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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served this 23rd day of April, 2009, by ordinary U.S. mail, postage prepaid, upon: **James P. Dinsmore**, OFFICE OF THE OHIO ATTORNEY GENERAL, Court of Claims Defense Section, 150 East Gay St., 18th Floor, Columbus, Ohio 43215; **Anthony Geiger**, Law Director, CITY OF LIMA, 209 N. Main St., 6th Floor, Lima, Ohio 45901; and upon **Todd M. Raskin** and **Carl E. Cormany**, MAZANEC, RASKIN, RYDER & KELLER, 100 Franklin's Row, 34305 Solon Road, Cleveland, Ohio 44139.



Sarah K. Skow
Counsel for Plaintiff

SCHEDULE A

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

- The Response Resistance Committee, investigating, and reporting
- The scope of officers' duties;
- Excessive force investigations and determinations;
- Standards for internal review of officers' conduct, including excessive force investigations or complaints;
- Referring or requiring officers to attend Anger Management or counseling (i.e., through Human Resources and/or the Administrative Investigation Unit);
- Anger Management Courses and Curriculums;
- "Early Intervention" programs standards, application, and follow-up;
- Employee Incident Response program;
- Policies regarding workplace violence;
- Administrative Investigation Unit Role(s), Policies, and Procedures; MATT teams after critical incidents; and
- Response to Resistance Committee Reporting, Guides, Procedures, and Investigations.

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April 23, 2009

Miles C. Durfey, Clerk
COURT OF CLAIMS OF OHIO
The Ohio Judicial Center
65 S. Front Street, 3rd Floor
Columbus, Ohio 43215

RE: *Eugene Wrinn, Jr. v. Ohio State Highway Patrol*
Court of Claims of Ohio Case No. 2006-05934

Dear Mr. Durfey:

I enclose an original and two copies of a Notice of Deposition under Civil Rule 30(B)(5). Please file with the Court and return at least one, file-stamped copy to our office in the enclosed, self-addressed, stamped envelope. Thank you for your assistance in this matter. *ja*

Sincerely,

Sarah K. Skow
Sarah K. Skow

SKS/lmk
Enclosures

cc: James P. Dinsmore, Esq. w/encl.
Anthony Geiger, Esq. w/encl.
Todd M. Raskin, Esq. w/encl.
Carl E. Cormany, Esq. w/encl.
Eugene M. Wrinn, Sr. w/encl.