

FILED

APR 29 2009

COURT OF CLAIMS OF OHIO

IN THE COURT OF CLAIMS OF OHIO

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 18, 2009, at 9:30 a.m., counsel for Plaintiff will take the deposition of designee(s) with the authority to testify on behalf of the Bath Township Fire Department as to matters known or available to the organization, at the Allen County Courthouse, 301 North Main Street, Lima, Ohio 45801. 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 27, 2009

Respectfully submitted,



Cary Rodman Cooper (0013062)

Sarah K. Skow (0081468)

COOPER & WALINSKI, L.P.A.

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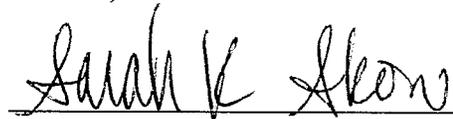
skow@cooperwalinski.com

Counsel for Plaintiff

ON COMPUTER

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served this 27th 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 Bath Township Fire Department, on its policies and procedures regarding:

- any person who administered a shot or other medical assistance to Eugene Wrinn, Jr. from 12:01 a.m. to 7:00 a.m. on September 16, 2005 relating to the traffic crash that occurred on September 16, 2005 in Allen County, Ohio on Interstate 75 involving Eugene Wrinn, Jr.;
- any person who has knowledge and information available respecting any shot or medical assistance given or administered to Eugene Wrinn, Jr. relating to the traffic crash that occurred on September 16, 2005 in Allen County, Ohio on Interstate 75; and
- any person who has knowledge and information available respecting Eugene Wrinn, Jr.'s medical condition relating to the traffic crash that occurred on September 16, 2005 in Allen County, Ohio on Interstate 75 involving Eugene Wrinn, Jr.

Sarah K. Skow
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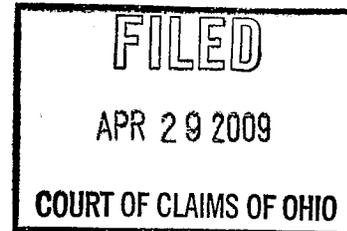
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April 27, 2009

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 the following items:

1. Notice of Deposition under Civil Rule 30(B)(5); and
2. Subpoena addressed to Bath Township Fire Department.

PL (1)
PL (2)

Please file both documents with the Court and return at least one, file-stamped copy of each to our office in the enclosed, self-addressed, stamped envelope. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Sarah K. Skow" followed by a stylized flourish.

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.