

2009 JUL 30 PM 8:53

**IN THE COURT OF CLAIMS OF OHIO**

<b>Eugene Wrinn, Jr.,</b>	)	Case No. 2006-05934
	)	
Plaintiff,	)	Judge J. Craig Wright
	)	
v.	)	<b>NOTICE OF DEPOSITION UNDER CIVIL</b>
	)	<b>RULE 30(B)(5)</b>
<b>Ohio State Highway Patrol,</b>	)	
	)	
Defendant.	)	

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PLEASE TAKE NOTICE that on **Monday, August 24, 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 (Grand Jury Room), 333 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: July 28, 2009

Respectfully submitted,




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Cary Rodman Cooper (0013062)  
 Sarah K. Skow (0081468)  
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*Counsel for Plaintiff*

**ON COMPUTER**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served this 28th day of July, 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.

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July 28, 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; and
2. Subpoena addressed to Bath Township Fire Department.

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.

*P.S.*

Sincerely,



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.