

IN THE COURT OF CLAIMS OF OHIO

COURT OF CLAIMS OF OHIO  
2009 AUG 28 PM 4:02

Eugene Wrinn, Jr.,

Plaintiff,

v.

Ohio State Highway Patrol,

Defendant.

) Case No. 2006-05934

)

) Judge J. Craig Wright

)

) AMENDED NOTICE OF DEPOSITION UNDER  
) CIVIL RULE 30(B)(5)

)

)

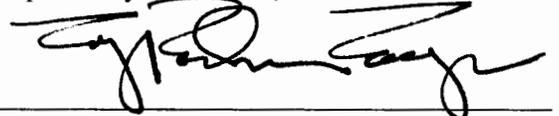
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PLEASE TAKE NOTICE that on Wednesday, September 2, 2009, beginning at 9:00 a.m., counsel for Plaintiff will take the deposition of designee(s) with the authority to testify on behalf of the Ohio State Highway Patrol as to matters known or available 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: August 25, 2009

Respectfully submitted,



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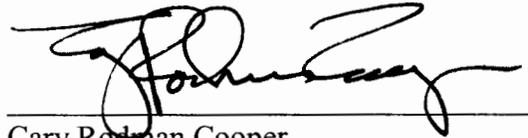
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Counsel for Plaintiff

ON COMPUTER

**CERTIFICATE OF SERVICE**

I here certify that a copy of the foregoing was served this 25th day of August, 2009 by ordinary U.S. mail, postage prepaid, upon: **James P. Dinsmore**, Assistant Attorney General, Court of Claims Defense Section, 150 East Gay St., 18th Floor, Columbus, Ohio 43215-3130; **Anthony Geiger**, Law Director, CITY OF LIMA, 209 N. Main St., 6<sup>th</sup> Floor, Lima, Ohio 45901; upon **Todd M. Raskin** and **Carl E. Cormany**, MAZANEC, RASKIN, RYDER & KELLER CO., L.P.A., 100 Franklin's Row, 34305 Solon Road, Cleveland, Ohio 44139; and upon **Michael S. Loughry**, MAZANEC, RASKIN, RYDER & KELLER CO., L.P.A., 250 Civic Center Drive, Suite 400, Columbus, Ohio 43215.



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Cary Rodman Cooper  
*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.