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IN THE COURT OF CLAIMS OF OHIO

ORIGINAL

**Eugene Wrinn, Jr.,** ) Case No. 2006-05934  
 )  
Plaintiff, ) Judge Alan C. Travis  
 )  
v. ) **STIPULATION**  
 )  
**Ohio State Highway Patrol,** )  
 )  
Defendant. )

The parties hereby stipulate to the admission of the following at the immunity hearing before this Court, scheduled to begin on March 29, 2011:

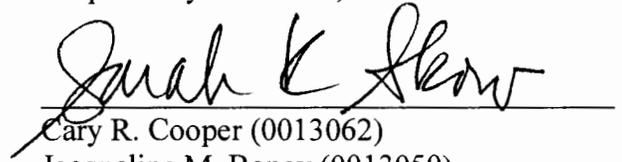
- June 5, 2009 deposition of Lt. Thomas Myers, Allen County Sherriff's Department;
- June 5, 2009 deposition of Deputy Robert Tomasi, Allen County Sherriff's Department;
- August 27, 2007 and November 30, 2007 30(b)(5) deposition of Ohio State Highway Patrol Lt. Steven Rine;
- April 5, 2006 Citizen Complaint Fact Finding Investigation by Lima Police Department;
- September 16, 2005 Lima Police Department Report;
- OSHP disciplinary records regarding Sgt. Darren Johnson:
  - Ohio State Highway Patrol records pertaining to Darren L. Johnson AI 2004-4127;
  - Ohio State Highway Patrol records pertaining to Darren L. Johnson AI 2004-4669;
  - Ohio State Highway Patrol records pertaining to Darren L. Johnson AI 2004-4145;

ON COMPUTER

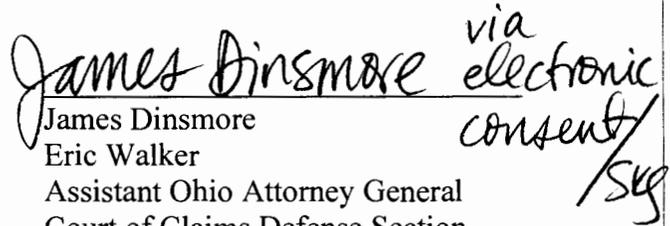
- Ohio State Highway Patrol Inter-Office communication regarding Darren L. Johnson, June 9, 2005;
- Ohio State Highway Patrol records pertaining to Darren L. Johnson AI 2004-4265;
- Ohio State Highway Patrol records pertaining to Darren L. Johnson AI 2005-6245;
- Lima City Police Department video from Lima Police Department Car 41, 38 September 16, 2005 (digitally and audio enhanced DVD);
- Lima Police Department's video 9/16/2005, Eugene Wrinn Jr. Resisting (digitally and audio enhanced DVD);
- Ohio State Highway Patrol video labeled Case #05-010134-0102 Sgt. Johnson DashCam (digitally and audio enhanced DVD);
- Ohio State Highway Patrol Policies and Procedures:
  - Policy No. OSP-203.20 Response to Resistance;
    - Policy No. 203.20-02 Response to Resistance – Less-Lethal Weapons;
    - Policy No. 203.20-03 Response to Resistance – Foot Pursuits;
  - Policy No. 203.03 Powers/Duties/Authority/Code of Ethics/Oath/Rules and Regulations;
  - Policy No. 103.19 Administrative Investigations;
  - Policy No. DPS-505.55 Workplace Violence Prevention;
- Ohio Highway State Patrol Investigation dated 9/16/05.

Dated: March 17, 2011

Respectfully submitted,



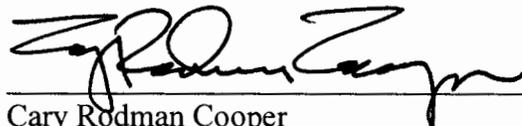
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 *via electronic consent / SKG*

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*Counsel for Defendant Ohio State  
Highway Patrol*

**CERTIFICATE OF SERVICE**

I here certify that a copy of the foregoing was served this 17th day of March, 2011 by ordinary U.S. mail, postage prepaid, upon: **James P. Dinsmore**, Assistant Attorney General, Court of Claims Defense Section, 150 East Gay Street, 18th Floor, Columbus, Ohio 43215-3130; **Anthony Geiger**, Law Director, CITY OF LIMA, 209 N. Main Street, 6th Floor, Lima, Ohio 45901; **Carl E. Cormany** and **Todd M. Raskin**, MAZANEC, RASKIN, RYDER & KELLER CO., L.P.A., 100 Franklin's Row, 34305 Solon Road, Cleveland, Ohio 44139; **Michael S. Loughry**, MAZANEC, RASKIN, RYDER & KELLER CO., L.P.A., 250 Civic Center Drive, Suite 400, Columbus, Ohio 43215; and upon **Jane M. Lynch** and **Jared A. Wagner**, GREEN & GREEN, LAWYERS, 800 Performance Place, 109 North Main Street, Dayton, Ohio 45402-1290.



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March 17, 2011

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 three copies of a proposed Stipulation in the above-referenced matter. Please submit the Stipulation to the Judge for approval, file the approved Stipulation 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. R.D.

Sincerely,



Cary Rodman Cooper

CRC/lmk  
Enclosures

cc: James P. Dinsmore, Esq. w/encl.  
Anthony L. Geiger, Esq. w/encl.  
Carl E. Cormany, Esq. and Todd M. Raskin, Esq. w/encl.  
Jane M. Lynch, Esq. and Jared A. Wagner, Esq. w/encl.  
Michael S. Loughry, Esq. w/encl.  
Eugene M. Wrinn, Sr. w/encl.