FILED
COURT OF CLAIMS
OF OHIO

2011 MAY 20 AM 10: 44

IN THE COURT OF CLAIMS OF OHIO

ORIGINAL

Eugene Wrinn, Jr.,	Case No. 2006-05934
Plaintiff,	Judge Joseph T. Clark
v.	**PLAINTIFF MOTION TO EXCEED PAGE LIMITATION**
Ohio State Highway Patrol,	
Defendant.	Cary R. Cooper (0013062) Sarah K. Skow (0081468) COOPER & WALINSKI, L.P.A. 900 Adams Street Toledo, Ohio 43604 Phone: (419) 241-1200 Fax: (419) 242-5675 cooper@cooperwalinski.com skow@cooperwalinski.com *Counsel for Plaintiff*

Plaintiff Eugene Wrinn, Jr. moves the Court under L.C.C.R. 4(E) for leave to exceed the 15-page limit for his Proposed Findings of Fact and Conclusions of Law by 24 pages.

The immunity determination involves fact-intensive scrutiny of two OSHP officers' conduct under OSHP policies and generally accepted police practices and procedures. The record of the four-day immunity hearing includes: testimony from multiple fact witnesses and two experts; a 700+-page transcript; and many exhibits (including deposition transcripts, police reports, administrative investigations, and videos).

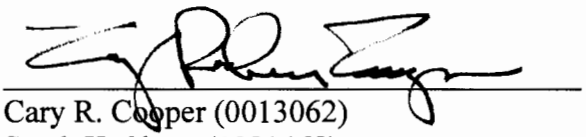
Wrinn respectfully requests the additional 24 pages in order to fully brief the factual and legal issues before the Court. Plaintiff's Proposed Findings of Fact and Conclusions of Law is filed contemporaneously with this Motion.

COOPER & WALINSKI
A LEGAL PROFESSIONAL
ASSOCIATION
900 ADAMS STREET
TOLEDO, OHIO 43604

ON COMPUTER

Dated: May 19, 2011

Respectfully submitted,

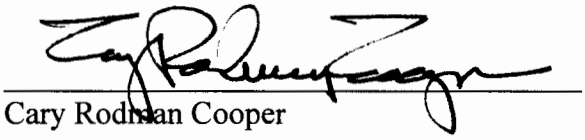


Cary R. Cooper (0013062)
Sarah K. Skow (0081468)
COOPER & WALINSKI, L.P.A.
900 Adams Street
Toledo, Ohio 43604
Phone: (419) 241-1200
Fax: (419) 242-5675
cooper@cooperwalinski.com
skow@cooperwalinski.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 19th day of May, 2011 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.



Cary Rodman Cooper

COOPER & WALINSKI LPA

A Legal Professional Association

Cary Rodman Cooper
Attorney at Law
Licensed in Ohio & Michigan
419.249.0245 Direct Dial
419.720.3406 Direct Fax
cooper@cooperwalinski.com

900 Adams Street
Toledo, OH 43604

419.241.1200
419.242.5675 Fax
toledo@cooperwalinski.com

May 19, 2011

VIA UPS EXPRESS

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

FILED
COURT OF CLAIMS
OF OHIO
2011 MAY 20 AM 10:44

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. Plaintiff's Motion to Exceed Page Limitation; and

2. Plaintiff's Proposed Findings of Fact and Conclusions of Law.

Please file these items 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.

VDS 05/20/11

Sincerely,

Cary Rodman Cooper

CRC/lmk
Enclosures

cc: James P. Dinsmore, Esq. w/encl.
Eugene M. Wrinn, Sr. w/encl.