

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

2013 APR 30 AM 10:48

IN THE COURT OF CLAIMS OF OHIO

DARLENE LANE FERRARO, etc.)	CASE NO. 2011-10371
)	
Plaintiff)	JUDGE ALAN C. TRAVIS
)	
v.)	
)	PLAINTIFF'S MOTION FOR
THE OHIO STATE UNIVERSITY)	EXTENSION OF EXPERT
MEDICAL CENTER)	REPORT DEADLINE
)	
Defendant)	

Now comes the Plaintiff, by and through her counsel of record, and moves this Honorable Court for an Order granting Plaintiff until May 20, 2013 to provide her expert reports. The granting of this motion will not affect the dispositive motion deadline or trial date scheduled on December 9, 2013. Plaintiff is in the process of having their crash reconstruction expert provide a report. Plaintiff also intends to call an assistant from the Cuyahoga County Coroner's office on decedent's cause of death.

In light of the above, Plaintiff moves this Honorable Court for an order granting her until May 20, 2013 to provide her expert reports.

RESPECTFULLY SUBMITTED,

W. Craig Bashein

W. CRAIG BASHEIN (0034591)
 BASHEIN & BASHEIN Co., LPA
 Attorney for Plaintiffs
 35th Floor, Terminal Tower
 50 Public Square
 Cleveland, Ohio 44113
 (216) 771-3239 / (216) 781-5876 (fax)
cbashein@basheinlaw.com

ON COMPUTER

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was sent this 26th day of April, 2013 via fax and first-class mail, postage pre-paid and e-mail upon the following:

Christopher P. Conomy, Esq.
150 East Gay Street, Floor 18
Columbus, Ohio 43215

W. Craig Bashein

W. CRAIG BASHEIN (0034591)
BASHEIN & BASHEIN CO., LPA

Bashein & Bashein

COMPANY, L.P.A.

R. William Bashein
(1919-1991)

W. Craig Bashein

Richard W. Bashein

Thomas J. Sheehan

John P. Hurst, Of Counsel

Anthony N. Palombo, Of Counsel

35th Floor, Terminal Tower
50 Public Square
Cleveland, Ohio 44113
Phone (216) 771-3239
Facsimile (216) 781-5876
www.basheinlaw.com

April 26, 2013

Court of Claims
65 South Front Street, 3rd Floor
Columbus, Ohio 43215

Attention: Civil Filing Clerk

RE: *Darlene Lane Ferraro, etc., v. The Ohio State University Medical Center*
Date of Incident: September 10, 2009

Dear Sir/Madam:

I am enclosing Plaintiff's Motion for Extension of Expert Report Deadline. Please file the original and return a time-stamped copy in the envelope provided. *WCB*

Thank you for your kind cooperation.

Very truly yours,



W. CRAIG BASHEIN

WCB/kmk
Enclosures

cc: Christopher Conomy, Esq.

FILED
COURT OF CLAIMS
OF OHIO
2013 APR 30 AM 10:48

Please file the original and return a time-stamped copy in the envelope provided.
I am enclosing Plaintiff's motion for extension of expert report deadline.