

FILED
COURT OF CLAIMS
OF OHIO

IN THE COURT OF CLAIMS OF OHIO

2014 JUN -2 AM 11: 21

LAURA A. MARTIN, Etc.,)
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)
)
Plaintiff,)
)
)
-vs-)
)
)
OHIO DEPARTMENT OF)
TRANSPORTATION,)
)
)
)
Defendants.)

CASE NO. 2013-00432

Judge Patrick M. McGrath

ORIGINAL

JOINT MOTION TO EXTEND DEADLINES

The parties jointly move this Honorable Court to extend the deadlines in the within matter as the parties wish to explore mediation after plaintiff provided a demand to defendant. Additional time will be necessary to schedule a mediation and to provide expert reports hereafter if mediation does not resolve the matter. To date, significant paper discovery has been exchanged, seven (7) ODOT employees and three (3) Ohio State Highway Patrol Officers, including the OSHP Crash Reconstructionist, have been deposed. The parents of Sarah Martin, who was gravely injured in the collision, have also been deposed. Sarah Martin met informally with defense counsel following her parents' depositions. The parties believe all fact discovery has been completed. The next phase is expert discovery which the parties wish to delay pending a possible mediation.

Accordingly, for the foregoing reasons, the parties jointly move this Honorable Court to extend the deadlines in accordance with the Joint Stipulation filed simultaneous herewith and attached hereto as Exhibit 1.

ON COMPUTER

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CERTIFICATE OF SERVICE

On May 28, 2014, a copy of the Joint Motion to Extend Deadlines was served via

Ordinary U.S. Mail to:

Peter E. DeMarco, Esq.
Stacy Hannan, Esq.
Assistant Attorneys General
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150 East Gay Street, 18th Floor
Columbus, Ohio 43215

Counsel for Defendant, Ohio
Department of Transportation



Ellen M. McCarthy, Esq.

Attorney for Plaintiff

IN THE COURT OF CLAIMS OF OHIO

LAURA A. MARTIN, Etc.

CASE NO. 2013-00432

Plaintiffs,

Judge Patrick M. McGrath

-vs-

OHIO DEPARTMENT OF
TRANSPORTATION

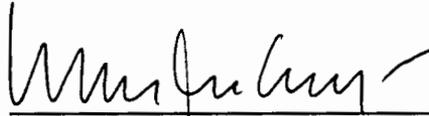
**PROPOSED STIPULATION AMONG THE
PARTIES**

Defendants.

The parties hereby propose to stipulate to the following NEW dates:

1. Plaintiff's expert reports due September 2, 2014;
2. Defendant's expert reports due October 2, 2014;
3. Trial date in the second week of December 2014

and that the Court may enter an Order accordingly, notice by the Clerk being hereby waived.



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Judge

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2014 JUN -2 AM 11:21

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May 28, 2014

Court of Claims of Ohio
The Ohio Judicial Center, Clerk of Courts
65 South Front Street, Third Floor
Columbus, Ohio 43215

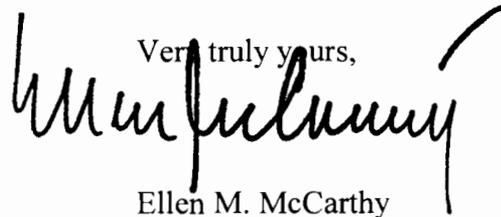
Re: Laura A Martin, Guardian of Sarah E. Martin, et al. v. Ohio Department
of Transportation
Court of Claims of Ohio, Case Number: 2013-00432
Our File Number: 76976

Dear Sir or Madam:

Enclosed herein please find the original and two copies of the **Joint Motion to Extend Deadlines** with the **Proposed Stipulation Among the Parties**, which we ask that you please file with the Court upon receipt and return to us a time-stamped copy in the envelope provided. 

Thank you for your attention and should you have any questions, please feel free to contact the undersigned

Very truly yours,



Ellen M. McCarthy

EMM/jkg
Enclosures

cc: Peter E. DeMarco, Esq.
Stacy Hannan, Esq.