

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

2014 JUL -9 PM 3:10

IN THE COURT OF CLAIMS OF THE STATE OF OHIO

**ANN M. HIGGS**

Plaintiff,

-vs-

**UNIVERSITY OF TOLEDO  
MEDICAL CENTER**

Defendant.

Case No.: 2013-00576

Judge Patrick M. McGrath

**JOINT MOTION FOR  
EXTENSION OF TIME FOR  
EXPERT IDENTIFICATION AND  
REPORTS**

Trial Counsel:

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Attorney for Plaintiff

Now come the parties and hereby respectfully request that this Court grant an extension of time for identification of experts and submission of expert reports. Currently, the Plaintiff is scheduled to identify experts and submit expert reports on July 18, 2014. The Defendant is presently scheduled to identify experts and submit expert reports on August 29, 2014.

Depositions of the Plaintiff and Defendant are presently scheduled for August 19<sup>th</sup> and August 20<sup>th</sup>. Experts for both parties will need the depositions in order to

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complete detailed and meaningful reports in this matter. Therefore, the parties respectfully request that the Court revise the expert schedule as follows:

- 1) Plaintiff to identify experts and submit expert reports November 3, 2014; and
- 2) Defendant to identify experts and submit expert reports December 15, 2014.

The parties have agreed to the above schedule and submit that revision of the schedule as proposed will not pose any delay in this matter.

Respectfully submitted,

*Robert M Scott by Anne*  
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Attorney for Plaintiff  
*Strait*  
*per auth.*

*Anne Berry Strait*  
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