

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

2014 JUL 14 AM 10:55

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

**NOTICE TO TAKE DEPOSITION OF  
JIANLIN TANG, M.D.**

Trial Counsel:

Robert M. Scott (0006643)  
Lafferty, Gallagher & Scott, LLC  
416 North Erie Street, Suite 400  
Toledo, OH 43604-5622  
(419) 241-5500  
(419) 245-3849 (Facsimile)

Attorney for Plaintiff

Please take notice that on Wednesday, August 20, 2014, Plaintiff, by and through her counsel, will take the deposition of Jianlin Tang, M.D., concerning the subject matter of this action. The deposition will take place in Room 306 on the 3<sup>rd</sup> Floor of the Mulford Library at UTMC, 3025 Library Circle, Toledo, Ohio, and will begin at 9:00 a.m.

Said deposition will be taken upon oral examination for all purposes proper and under the Ohio Rules of Civil Procedure and the statutes of Ohio, including use at trial, before a notary public or before some other person authorized by law to administer oath, and said deposition will continue from day to day until completed.

Respectfully submitted,

LAFFERTY GALLAGHER & SCOTT, LLC

  
Robert M. Scott  
Attorney for Plaintiff

**ON COMPUTER**

**LAFFERTY,  
GALLAGHER &  
SCOTT, LLC**

ATTORNEYS AT LAW  
Toledo Legal Building,  
Suite 400  
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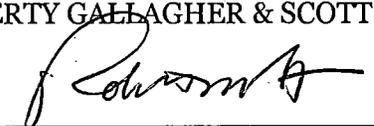
**CERTIFICATE OF SERVICE**

This will certify that the foregoing Notice to Take Deposition of Jianlin Tang, M.D.,  
was served by ordinary U.S. Mail this 10<sup>th</sup> day of July 2014, upon the following:

Anne Berry Strait  
Assistant Attorney General  
Court of Claims Defense Section  
150 East Gay Street, Floor 18  
Columbus, OH 43215  
Attorney for Defendant

Respectfully submitted,

LAFFERTY GALLAGHER & SCOTT, LLC

By 

Robert M. Scott  
Attorney for Plaintiff

**LAFFERTY,  
GALLAGHER &  
SCOTT, LLC**

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Jon A. Lafferty  
Thomas W. Gallagher  
Robert M. Scott  
Joseph S. Hartle  
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July 10, 2014

Clerk of Courts  
Court of Claims of Ohio  
The Ohio Judicial Center  
65 S. Front, Third Floor  
Columbus, OH 43215

Re: *Ann M. Higgs v. UTMC*  
Case No.: 2013-00576  
Our File No.: 4689

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Dear Clerk:

Please find enclosed the original and several copies of the *Notice to Take Deposition of Jianlin Tang, M.D.*

Please file in your usual manner and return any unused file-stamped copies in the enclosed self-addressed, postage-paid envelope. *lcs*

Thank you for your assistance in this matter.

Sincerely,

LAFFERTY, GALLAGHER & SCOTT, LLC

By *Robert M. Scott*

Robert M. Scott  
(419) 241-5500, Ext. 113

RMS/nmp  
Enclosures  
cc: Ann Berry Strait, Esq.