

ORIGINAL

FILED  
COURT OF CLAIMS  
OF OHIO

IN THE COURT OF CLAIMS OF OHIO

2014 AUG 13 PM 3: 16

JAMES DANIEL HUGHES, et. al.	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	Case No. 2012-09059
	:	
THE OHIO STATE UNIVERSITY	:	Judge Patrick M. McGrath
	:	
Defendant.	:	

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Ohio Rules of Civil Procedure, counsel for defendant The Ohio State University will take the following deposition:

<u>Name</u>	<u>Date &amp; Time</u>	<u>Location</u>
Robert Reed	Friday, September 5, 2014 10:00 a.m.	Carpenter Lipps & Leland 280 N. High Street Suite 1300 Columbus, Ohio 43215 (614) 365-4130

The deponent should bring with him the following:

- All documents, records, depositions, files, photographs, videotapes, medical records, investigative reports, other written materials, and/or electronic storage mediums relied upon, created or utilized by him in forming his opinions in the above captioned matter;
- All books, articles, treatise, tests, reports, studies, manuals or periodicals or documents of any other kind on which he may rely, cite or consult for any opinions he holds in the above captioned matter;
- All reports, tests, test results, graphs, models or other things prepared or used by him and which form the basis for his opinions or testimony;
- All work notes dealing with the above captioned matter;
- All documents relating to his fee arrangement in the above captioned matter;

ON COMPUTER

- All of his time sheets, billing statements, or invoices relating to the above captioned matter;
- His current curriculum vitae;
- A list of all lawsuits in which he has provided testimony at hearing or trial;
- A list of all lawsuits in which he has given deposition testimony;
- All films, videos or photographs he reviewed or created in relation to the above captioned matter;
- All Ohio State University documents he relied upon in forming his opinions in the above captioned matter, whether obtained in the above captioned matter or from other sources; and
- All exhibits he intends to use at the trial of this matter.

The examination will be taken by stenographic means before a notary public or other officer authorized by law to administer oaths. The deposition will continue thereafter from day to day until completed.

Respectfully submitted,

MICHAEL DeWINE  
Attorney General of Ohio



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Attorneys for Defendant The Ohio State University

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice Of Deposition was served this 13th day of

August 2014, by ordinary U.S. mail, postage prepaid, upon:

Stephen S. Crandall  
Marc G. Pera  
15 ½ Franklin Street  
Chagrin Falls, Ohio 44022

  
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One of the Attorneys for The Ohio State University

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