

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

IN THE COURT OF CLAIMS OF OHIO

2014 AUG 26 PM 3:03

DARLENE LANE FERRARO

Plaintiff

v.

THE OHIO STATE UNIVERSITY
MEDICAL CENTER

Defendant

CASE NO. 2011-10371

JUDGE PATRICK M. McGRATH

MAGISTRATE
ROBERT VAN SCHOYCK

**DEFENDANT'S AMENDED MOTION TO MARK TRANSCRIPT OF
DEPOSITION OF CHAD MEEKS AS AN EXHIBIT**

Defendant, The Ohio State University Medical Center, respectfully asks this Court to allow the transcript of the deposition of Chad Meeks to be marked as Defendant's Exhibit L.¹

The transcript was filed with this Court on December 5, 2013, in anticipation that Mr. Meeks would testify at the trial then scheduled for the next week. The trial was twice continued and Mr. Meeks subsequently refused to respond to efforts to obtain his appearance. At trial the parties agreed to submit numerous deposition transcripts in lieu of live testimony, including the transcript of Mr. Meeks' deposition. Tr. at 8-9. The parties had agreed to mark the transcript of Mr. Meeks' deposition as an exhibit at the outset, but counsel neglected to carry through with actually marking it as an exhibit. Tr. at 8.

Wherefore, in accordance with the agreement made on the record of this matter, Defendant asks that the transcript of Mr. Meeks' deposition be marked as Exhibit L and admitted as agreed by the parties.

¹ Defendant inadvertently requested that the deposition be marked as Exhibit F, although another exhibit has been so marked.

ON COMPUTER

Respectfully submitted,

MICHAEL DE WINE
Ohio Attorney General



JEFFREY L. MALOON (0007003)
Jeffrey.Maloon@OhioAttorneyGeneral.gov
CHRISTOPHER P. CONOMY (0072094)
Christopher.Conomy@OhioAttorneyGeneral.gov
Assistant Attorneys General
Court of Claims Defense
150 East Gay Street, 18th Floor
Columbus, Ohio 43215-3130
Telephone: 614-466-7447
Facsimile: 866-452-9957
COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

On August 25, 2014, a copy of this document was served via regular mail on the following:

W. Craig Bashein
Thomas J. Sheehan
Terminal Tower, 35th Floor
50 Public Square
Cleveland, Ohio 44113

Counsel for Plaintiff



CHRISTOPHER P. CONOMY (0072094)
Assistant Attorney General