

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

2014 AUG 26 PM 2:13

IN THE COURT OF CLAIMS
STATE OF OHIO

Tina Carroll

Plaintiff

v.

University of Toledo Medical Center,
et al.

Defendants

Case No.

JUDGE

**MOTION FOR EXTENSION OF TIME
TO FILE AFFIDAVITS OF MERIT**

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Counsel for Plaintiff

Now comes Plaintiff, by and through counsel, and moves the Court for an extension of time of ninety (90) days from the filing of this action to provide an Affidavit of Merit, pursuant to Civ. R. 10, relative to University of Toledo Medical Center, John Geisler, MD, Samay Jain, MD, and Ronica Neuhoff, MD.

As basis for Plaintiff's Motion, counsel for Plaintiff advises the Court that they have been unable to obtain the appropriate Affidavit of Merit in time to attach to the Complaint filed with this Court. The Statute of Limitations, pursuant to "180 day" letters, will expire September 2, 2014. The Plaintiff must file her cause of action to preserve

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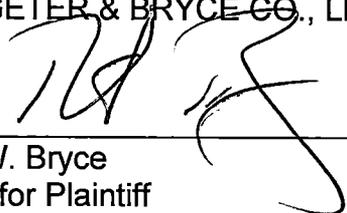
her rights. This matter is currently being reviewed by a physician of appropriate qualification to render an opinion as to the named Defendants. No one will be prejudiced and no harm can come by the granting of said motion.

Plaintiff requests and extension not to exceed ninety (90) days from the date of filing within which to file an Affidavit of Merit as to Defendants, University of Toledo Medical Center, John Geisler, MD, Samay Jain, MD, and Ronica Neuhoff, MD.

A proposed Order is attached for the Court's convenience.

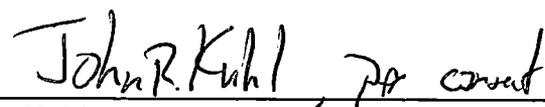
Respectfully submitted,

SCHLAGETER & BRYCE CO., LPA



Robert W. Bryce
Counsel for Plaintiff

LAW OFFICE OF JOHN R. KUHL



John R. Kuhl
Co-counsel for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was mailed this 25 day of

August, 2014 to the following:

University of Toledo Medical Center
3000 Arlington Avenue
Toledo, OH 43614

John Geisler, MD
Athens Regional Medical Center
c/o Eric Quirion, Director of Graduate
Medical Education
1911 Prince Avenue
Athens, GA 30606

Samay Jain, MD
Medical Pavilion
1125 Hospital Drive
Toledo, OH 43614

Ronica Neuhoff, MD
Rupert Health Center
3125 Transverse Drive
Toledo, OH 43614



Robert W. Bryce
Counsel for Plaintiff

IN THE COURT OF CLAIMS
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v.

JOURNAL ENTRY

University of Toledo Medical Center,
et al.

Defendants

Upon Motion of Plaintiff, after due consideration and for good cause shown, it is hereby

ORDERED, ADJUDGED AND DECREED that Plaintiff is granted ninety (90) days from the filing of this action, until and including the ____ day of _____, 2014 within which to file her Affidavit of Merit(s), pursuant to Civ. R. 10.

All until further Order of Court.

Date

JUDGE