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COURT OF CLAIMS
OF OHIO

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IN THE COURT OF CLAIMS OF OHIO

YONG HUI SHEFFIELD, Plaintiff, v. THE OHIO STATE UNIVERSITY WEXNER MEDICAL CENTER, Defendant, v. OHIO HEALTHCARE PURCHASING, INC., dba OHA SOLUTIONS STAFFING PROGRAM, et al., Third-Party Defendants.	:	Case No. 2013-00013

NOTICE OF DEPOSITION

Please take notice that counsel for Defendant The Ohio State University Wexner Medical Center will take the discovery deposition *duces tecum* of Carolyn Cassutt, RN on Monday, September 22, 2014 at 9:00 a.m. local (Mountain) time at Patterson Reporting, 2170 South Parker Road, Suite 263, Denver, Colorado.

The witness shall testify as if on cross-examination and the deposition will continue until completed.

Further, it is requested that the witness bring to the deposition the following documents:

1. Any notes, timelines, summaries, or narrative statements prepared by the witness regarding this case.

2. Any notes, timelines, summaries, or narrative statements provided to the witness regarding this case.

3. Any and all correspondence to and from the witness from any person regarding this case.

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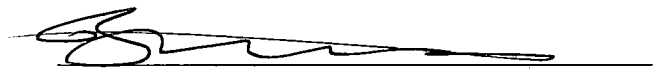
4. Any and all medical records and other materials, including images and slides, reviewed by the witness in regard to this case.

5. Any and all documents identifying or listing all litigation proceedings in which the witness has been involved as a medical expert, including any Rule 26 lists.

6. Any and all medical literature the witness has reviewed in connection with this case.

7. Any and all documents reflecting or recording the time spent by the witness reviewing and working on this case, and/or the amount invoiced by the witness in connection with services rendered in this case.



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Special Counsel for Ohio Attorney General

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and complete copy of the foregoing Notice of Deposition was served by regular U.S. mail, postage prepaid, this 5th day of September, 2014.upon the following:

Michael Rourke, Esq.
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Co-counsel for Defendant

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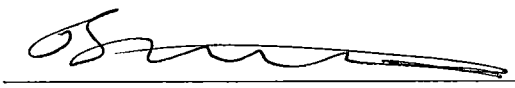
Counsel for Third-Party Defendant, Medical Staffing Options, Inc.



Theodore P. Mattis