

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

2014 SEP 19 PM 3:11

IN THE COURT OF CLAIMS OF OHIO

ROY BUCHANAN,

Plaintiff,

v.

OHIO DEPARTMENT OF  
REHABILITATION AND  
CORRECTION,

Defendant.

Case No. 2013-00671

Magistrate Robert Van Schoyck

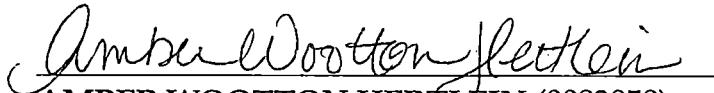
DEFENDANT'S  
PRETRIAL STATEMENT

Defendant may call the following witnesses to testify at trial: Plaintiff Roy Buchanan, as on cross-examination; C.O. James Ward; Health Care Personnel and other employees of Defendant as needed; any witness called or identified by Plaintiff; and others as needed to refute Plaintiff's claims. Defendant may introduce the following exhibits at trial: documents kept by Defendant about Plaintiff, including, but not limited to, classification records, kites, informal complaint resolutions, notifications of grievances, appeals, decisions, conduct reports, incident reports and medical records; relevant institutional rules, policies and procedures; documents attached to Defendant's motion for summary judgment; documents produced by the parties during discovery; documents identified at the depositions taken in this matter; any document identified or introduced by Plaintiff; and others as needed to refute Plaintiff's claims. Defendant reserves the right to amend this pretrial statement to identify additional witnesses and exhibits.

**ON COMPUTER**

Respectfully submitted,

MICHAEL DEWINE  
Ohio Attorney General

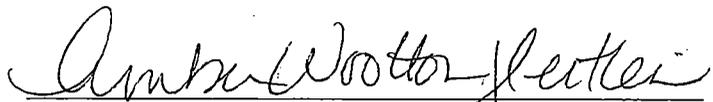


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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served via regular U.S. Mail, postage prepaid, this 19 day of September, 2014, upon the following:

**Richard F. Swope**  
**Swope and Swope – Attorneys at Law**  
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**Reynoldsburg, Ohio 43068**



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