

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

2014 OCT -9 PM 3: 02

IN THE COURT OF CLAIMS OF OHIO

MATTHEW RIES, Admr., et al., :  
 :  
 Plaintiffs :  
 :  
 v. : Case No. 2010-10335  
 :  
 THE OHIO STATE UNIVERSITY : Judge Patrick M. McGrath  
 MEDICAL CENTER, :  
 :  
 Defendant :

**NOTICE OF DEPOSITION**

Please take notice that commencing at 1:00 P.M. on Wednesday, October 22, 2014, and continuing until completed, at the offices of Primary Health Group, 1471 Johnston-Willis Drive, Richmond, Virginia 23235; Telephone (804) 320-1333, Defendant will take the deposition of Jerome M. Daniel, M.D., upon oral examination, pursuant to the Ohio Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths.

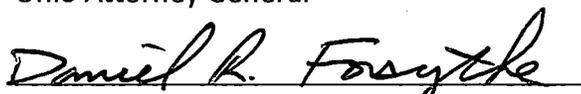
Deponent is requested to bring with her to said deposition the following items:

1. All records pertaining to Matthew McNew in the witness' custody or control.
2. All materials or documents which the witness has reviewed or relied upon for the opinions she holds and intends to express as an expert witness in this case.

3. All materials, reports, or documents prepared by the witness which reflect or summarize any of the opinions he holds and intends to express as an expert witness in this case.
4. All materials or documents which reflect any compensation made by the witness for the time spent or devoted to his review of this case as an expert witness.
5. All materials or documents provided to the witness by plaintiff's attorney which identify facts or data that the witness considered in forming the opinions to be expressed.
6. All materials or documents provided to the witness by plaintiff's attorney which identify assumptions that the witness relied upon on in forming the opinions to be expressed.
7. A current Curriculum Vitae and bibliography.

Respectfully submitted,

MIKE DeWINE  
Ohio Attorney General

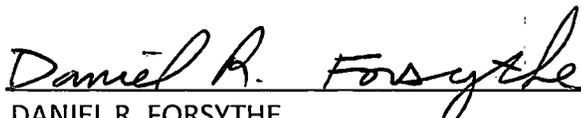


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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Notice of Deposition was sent by regular U.S. Mail,  
postage prepaid, this 9<sup>th</sup> day of October, 2014 to:

David I. Shroyer  
536 South High Street  
Columbus, Ohio 43215  
Attorney for Plaintiff

  
DANIEL R. FORSYTHE  
Assistant Attorney General