ORIGINAL

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COURT OF CLAIMS
OF OHIO

2014 OCT 10 PM 3: 12

IN THE COURT OF CLAIMS OF OHIO

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

AMENDED NOTICE OF DEPOSITION

Please take notice that commencing at 1:00 P.M. on Tuesday December 2, 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.

ON COMPUTER

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

Daniel R. Forsythe

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(614) 466-7447
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 10TH day of October, 2014 to:

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

Daniel R. Forsythe
DANIEL R. FORSYTHE
Assistant Attorney General