

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

IN THE COURT OF CLAIMS OF OHIO

2014 OCT 15 PM 3:12

WILLIAM RUSSELL

Plaintiff

vs.

CLEVELAND STATE UNIVERSITY

Defendant

Case No. 2013-00138

Judge Patrick M. McGrath
Magistrate Holly True Shaver

NOTICE OF FILING ORIGINAL AFFIDAVIT

Now comes the Defendant, Cleveland State University, by and through counsel, and provides notice of filing the original affidavit of Sonali B. Wilson in support of its motion for summary judgment and in opposition to Plaintiff's motion for partial summary judgment.

MICHAEL DEWINE

Ohio Attorney General



RANDALL W. KNUTTI (0022388)

AMY S. BROWN (0079650)

EMILY M. SIMMONS (0082519)

Assistant Attorneys General

Ohio Attorney General's Office

Court of Claims Defense Section

150 East Gay Street, Floor 18

Columbus, OH 43215

T: (614) 466-7447 | F: (614) 644-9185

Randall.Knutti@OhioAttorneyGeneral.gov

Amy.Brown@OhioAttorneyGeneral.gov

Emily.Simmons@OhioAttorneyGeneral.gov

Counsel for Defendant, Cleveland State University

ON COMPUTER

CERTIFICATE OF SERVICE

On October 15, 2014, we sent a copy of this document via electronic mail to

Plaintiff's Counsel:

Mark Griffin (mgriffin@tpgfirm.com)

Sara Verespej (SVerespej@tpgfirm.com)



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EMILY M. SIMMONS (0082519)

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**AFFIDAVIT OF
SONALI B. WILSON**

STATE OF OHIO)
) ss
COUNTY OF CUYAHOGA)

Sonali B. Wilson, after first being cautioned and sworn, states as follows:

1. I have personal knowledge of and I am competent to testify to the facts contained in this Affidavit. I have personally reviewed the pleadings, motions and memorandums filed in this lawsuit and am familiar with the underlying facts of this lawsuit.
2. I am employed as the General Counsel for Cleveland State University (CSU) and have held that at all times relevant to this lawsuit.
3. A true and accurate copy of the collective bargaining agreement that governed Mr. Russell's employment at the time of his termination can be viewed online at <http://www.csuohio.edu/organizations/seiu1199/docs/SEIU2011-2014.pdf>.
4. A true and accurate copy of my September 9, 2012 email to Mr. Russell is attached to Cleveland State University's Memorandum in Opposition to William Russell's Motion for Partial Summary Judgment that filed with this Court on October 3, 2014.

Further, Affiant sayeth naught.

Sonali B. Wilson

Sonali B. Wilson, General Counsel
Cleveland State University

Sworn to and subscribed in my presence this 6th day of October, 2014.

Heidi Szeltner

Notary Public



HEIDI SZELTNER
NOTARY PUBLIC - OHIO
MY COMMISSION EXPIRES 11-1-18