

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

**IN THE COURT OF CLAIMS OF OHIO**

2014 NOV -7 PM 3: 08

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

**DEFENDANT'S NOTICE OF DEPOSITION**

To: Christine Reid, R. N.  
c/o David I. Shroyer, Esquire  
Colley Shroyer Abraham Co., L.P.A.  
536 South High Street  
Columbus, Ohio 43215

Please take notice that Jeffrey L. Maloon, co-counsel for Defendant herein, will take the deposition of Christine Reid, R. N., upon oral examination pursuant to the Ohio Rules of Civil Procedure, before a notary public or some other officer authorized by law to administer oaths, on Wednesday, November 19, 2014, beginning at 9:30 a.m., at the offices of Colley Shroyer Abraham, 536 South High Street, Columbus, Ohio. The examination will continue from day to day until completed.

Pursuant to Ohio Rule of Civil Procedure 30(B)(4), the deponent is required to produce at the time of the deposition the described records, documents, and things listed below.

**DOCUMENTS TO BE PRODUCED**

1. The complete, accurate and current curriculum vitae of the deponent.
2. The entire file of the deponent regarding this matter including, but not

**ON COMPUTER**

limited to: (A) all documents furnished to the deponent by counsel for Plaintiffs that (i) relate to compensation for the services provided by the deponent, (ii) identify facts or data provided by counsel that the deponent considered in forming her opinions, and (iii) identify assumptions provided by counsel that the deponent relied upon in forming her opinions; (B) all documents obtained or created by the deponent; (C) all documents reviewed by the deponent, referred to, or relied upon in arriving at any of the deponent's opinions or conclusions concerning the issues involved in this lawsuit and further including, but not limited to, all medical literature reviewed by the deponent; (D) all email transmissions either created or received by the deponent regarding this lawsuit; and (E) all models, illustrations, photographs or other exhibits or documents of any kind which the deponent has created, seen, or from which the deponent intends or contemplates using to explain, illustrate or support the deponent's expected trial testimony.

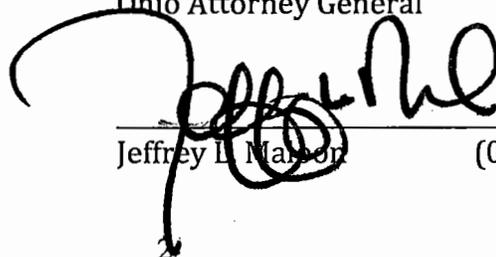
3. The report prepared by the deponent with regard to this litigation.

4. Any and all invoices submitted to Plaintiffs or counsel for Plaintiffs for services rendered by the deponent or an agent of the deponent regarding this litigation.

5. Any and all time records prepared in connection with the deponent's review of this case and preparation of her expert report.

Respectfully submitted,

MIKE DeWINE  
Ohio Attorney General



Jeffrey L. Mahan

(0007003)

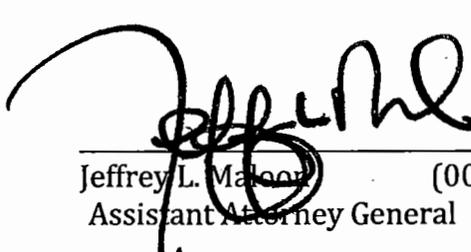
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Counsel for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing Notice of Deposition was served via electronic mail this 7<sup>th</sup> day of November, 2014, upon the following counsel of record:

David I. Shroyer, Esquire  
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kvandoorn@csajustice.com  
Attorney for Plaintiffs

  
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Jeffrey L. Maloon (0007003)  
Assistant Attorney General

ec: Paula Luna Paoletti, Esquire  
Daniel R. Forsythe, Esquire  
Spectrum Court Reporting