

**ORIGINAL**

IN THE COURT OF CLAIMS FOR THE STATE OF OHIO

FILED  
COURT OF CLAIMS  
OF OHIO

MATTHEW RIES, Admr., et al.,

Plaintiff,

vs.

THE OHIO STATE UNIVERSITY  
MEDICAL CENTER,

Defendant.

2014 NOV 12 PM 12:17

Case No. 2010-10335

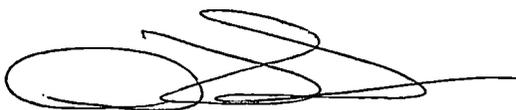
Judge Joseph T. Clark

**NOTICE OF TAKING TELEPHONE DEPOSITION**  
**DUCES TECUM**

Please take notice that Plaintiff, by and through counsel, will take the discovery deposition duces tecum of defense expert, Bruce Jaffee, Ph.D., by phone on *Friday, November 14, 2014, beginning at 1:00 p.m.*, to be held in a conference room at *the law firm of Kelley & Belcher, 301 West 7th Street, Bloomington IN*. The deposition will be taken by an officer duly authorized to administer oaths, pursuant to Rule 30 of the Ohio Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE that the deponent is required to produce a copy of all billing records and notes pertaining to his review of this matter, all documents that were used to prepare him for this deposition and/or otherwise used for rendering opinions, at the time of his deposition.**

Respectfully submitted,



David I. Shroyer (0024099)  
**COLLEY SHROYER & ABRAHAM CO. LPA**  
536 South High Street  
Columbus, Ohio 43215  
(614) 228-6453  
(614) 228-7122 (fax)  
Attorney for Plaintiff

**ON COMPUTER**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing instrument was served upon the following counsel of record via email only, this 11<sup>th</sup> day of November 2014:

Daniel R. Forsythe, Esq.  
Jeffrey L. Maloon, Esq.  
Office of the Ohio Attorney General  
Court of Claims Defense Section  
150 East Gay Street, Suite 1800  
Columbus, OH 43215  
*Attorneys for Defendant*



David I. Shroyer (0024099)  
Attorney for Plaintiff