

ORIGINAL

IN THE COURT OF CLAIMS FOR THE STATE OF OHIO

FILED
COURT OF CLAIMS
OF OHIO

MATTHEW RIES, Admr., et al.,

Plaintiff,

2014 NOV 12 PM 12:17

Case No. 2010-10335

vs.

Judge Joseph T. Clark

**THE OHIO STATE UNIVERSITY
MEDICAL CENTER,**

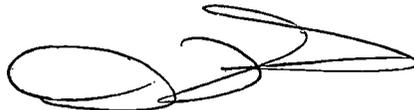
Defendant.

NOTICE OF TAKING VIDEOTAPE DEPOSITION
DUCES TECUM

Please take notice that Plaintiff, by and through counsel, will take the discovery deposition duces tecum of defense expert, Stephan Payne, M.D., by videotape on *Wednesday, December 17, 2014, beginning at 4:00 p.m.*, to be held in a conference room as yet determined at *the Marriot Courtyard Cincinnati Airport, 3990 Olympic Blvd., Erlanger KY 41018*. 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 11th 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