

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

IN THE OHIO COURT OF CLAIMS

2014 NOV 13 PM 12:03

YONG HUI SHEFFIELD, et al.,

Plaintiffs,

-v-

THE OHIO STATE UNIVERSITY
MEDICAL CENTER,

Defendant.

Case No. 2013-00013

Judge Patrick McGrath

PLAINTIFFS' NOTICE TO TAKE DEPOSITION
DUCES TECUM OF BRUCE FARBER, M.D.

Pursuant to the Ohio Rules of Civil Procedure, Plaintiffs will take the deposition of **Bruce Farber, M. D.** on **Thursday, December 11, 2014** beginning at **10:30 a.m.** the office of Dr. Farber, North Shore University Hospital, 400 Community Drive, Manhasset, New York. The deposition will be recorded by stenographic and/or video means, and will be taken before a notary public or some other officer authorized by law to administer oaths. You are invited to attend and examine.

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 limited to:
 - (A) all documents furnished to the deponent by anyone; (B) all documents obtained or created by the deponent, including notes; (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 e-mail transmissions either created or received by the deponent regarding this lawsuit; and

ON COMPUTER

(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 original report, as well as any and all previous drafts of the report, prepared by deponent with regard to this litigation.

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

5. All medical literature that deponent intends to cite as authoritative at the time of trial.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served upon the following counsel of record via facsimile and/or electronic mail this 12th day of November, 2014:

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