

ORIGINAL

IN THE COURT OF CLAIMS FOR THE STATE OF OHIO

FILED  
COURT OF CLAIMS  
OF OHIO

MATTHEW RIES, Admr., et al.,

2014 DEC -2 PM 12: 53

Plaintiff,

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, Mark Fialk, M.D., by videotape on *Friday, December 12, 2014, beginning at 1:00 p.m.*, to be held at *the court reporting firm of Dalco Reporting, 170 Hamilton Ave., Suite 303, White Plains NY 10601*. 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,



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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 2<sup>nd</sup> day of December 2014:

Daniel R. Forsythe, Esq.  
Jeffrey L. Maloon, Esq.  
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