

FILED
COURT OF CLAIMS
OF OHIO

2015 JAN 13 PM 2:13

IN THE COURT OF CLAIMS FOR THE STATE OF OHIO

MATTHEW RIES, Admr., et al.,

ORIGINAL

Plaintiff,

Case No. 2010-10335

vs.

Judge Joseph T. Clark

THE OHIO STATE UNIVERSITY
MEDICAL CENTER,

Defendant.

**PLAINTIFF'S MOTION TO DEEM
REQUESTS FOR ADMISSION ADMITTED**

Plaintiff, by and through counsel, hereby moves the Court for an Order, pursuant to Rule 36(A) of the Ohio Rules of Civil Procedure, finding that the Amended Requests for Admission served on counsel for Defendant on December 11, 2014 are admitted. The reasons for this motion are set forth in the supporting memorandum.

Respectfully submitted,



Daniel N. Abraham (0023457)
David I. Shroyer (0024099)
Colley Shroyer & Abraham Co., L.P.A.
536 South High Street
Columbus OH 43215
(614) 228-6453
(614) 228-7122 (fax)
Email: dabraham@csajustice.com
Counsel for Plaintiffs

ON COMPUTER

MEMORANDUM IN SUPPORT

On December 8, 2014, Plaintiff served Plaintiff's Combined First Request for Production of Documents, Requests for Admission and Interrogatories to Defendant on counsel for Defendant.¹ An "Amended" version of Plaintiff's Combined First Request for Production of Documents, Requests for Admission and Interrogatories to Defendant, which corrected dates noted in the original discovery requests, was served on December 11, 2014.² Both requests required that written responses be served on counsel for Plaintiffs within twenty-eight (28) days of service of the requests on counsel for Defendant. Based on the later of these two service dates, Defendant's responses to Plaintiff's requests for admission were due on January 8, 2015.

Civ. R. 36(A) provides in relevant part that:

The matter is admitted unless, within a period designated in the request, not less than twenty-eight days after service thereof or within such shorter or longer time as the court may allow, the party to whom the request is directed serves upon the party requesting the admission a written answer or objection addressed to the matter, signed by the party or by the party's attorney.

Defendant has not answered or objected to the requests for admission served first on December 8, and then again on December 11, 2014, and the time to timely respond has now passed. Plaintiff did not anticipate the admissions requested are disputed given the discovery that had taken place and perhaps is why the requests have not been answered. However, in an effort to narrow the issues for trial, Plaintiff seeks an Order from the Court confirming the Defendant's admissions.

¹ A true and accurate copy of Plaintiff's Combined First Request for Production of Documents, Requests for Admission and Interrogatories to Defendant is attached hereto as Exhibit A.

² A true and accurate copy of Plaintiff's Amended Combined First Request for Production of Documents, Requests for Admission and Interrogatories to Defendant is attached hereto as Exhibit B.

Therefore, Plaintiff respectfully requests that the Court Order that Plaintiff's amended requests for admission served on December 11, 2014 be deemed admitted for the purpose of this action.

Respectfully submitted,



Daniel N. Abraham (0023457)
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

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 13th day of January, 2015:

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



Daniel N. Abraham (0023457)
Attorney for Plaintiff

IN THE COURT OF CLAIMS FOR THE STATE OF OHIO

MATTHEW RIES, Admr., et al.,

Plaintiff,

Case No. 2010-10335

vs.

Judge Joseph T. Clark

**THE OHIO STATE UNIVERSITY
MEDICAL CENTER,**

Defendant.

**PLAINTIFF'S COMBINED FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS, REQUESTS FOR ADMISSION AND
INTERROGATORIES TO DEFENDANT**

Pursuant to the Ohio Rules of Civil Procedure governing discovery requests, Plaintiff hereby requests that the referenced Defendant produce and permit said Plaintiff to inspect, copy or photograph the following documents, admit or deny the following Requests for Admission and answer the following Interrogatories.. As directed by the Ohio Civil Rules Defendant shall serve written responses to this request within twenty eight (28) days of service hereof at the office of David I. Shroyer, Esq., Colley, Shroyer & Abraham Co., LPA. Copies of the requested documents may be attached to the written response.

DEFINITIONS

The term "document" as used herein means all writings of any kind, including, but not limited to, the original and all non-identical copies, whether different from originals by reason of notation made on such copies or otherwise; letters; books; manuals; telegrams; memoranda; tape recordings; records; reports; contracts; analysis; calendar or diary entries; notes; charges; diagrams; lists; minutes and records of meetings and conferences and



telephonic or other communications; and any other items from which information can be received with or without the use of detection devices in the possession, custody or control of Defendant, Defendant's representatives, attorneys or other persons acting for/on Defendant's behalf.

DOCUMENTS REQUESTED

1. Complete copy of all records pertaining to documentation from nurses/medical assistants/staff or other categories of personnel for phone calls from Michael or Cyrelle McNew to an employee or agent of this Defendant (including but not limited to the offices of Dr. Husain and/or Dr. Rothbaum) from August 12 to September 18, 2011, including but not limited to the following:

1. Phone call(s) that lead up to the August 12, 2011 nurse's visit via Dr. Rothbaum's office
2. Phone call(s) that led up to the September 14, 2011 visit with Dr. Rothbaum.
3. Any and all calls received from, or placed to, Michael or Cyrelle McNew on September 17, 2011.
4. Any and all calls received from, or placed to, Michael or Cyrelle McNew on September 18, 2011.

Response:

2. A complete copy of any and all office records, phone records, phone logs, metadata, emails, computer generated records, text messages, pager messages or other recorded or written data associated with any of the above-referenced calls.

Response:

3. A complete copy of any and all office records, phone records, phone logs, metadata, emails, computer generated records, text messages, pager messages or other recorded or written data from August 1 to September 30, 2011 associated with:

1. Dr. Husain's pager identified in his deposition as ending with 1372.
2. Dr. Husain's personal cell phone ending in 8813 as identified in his deposition.
3. Any other pager numbers or personal phone numbers associated with Dr. Husain

Response:

4. Logs, whether handwritten or maintained by computer or other recorded instrument, associated with any and all calls received from, or placed to, Michael or Cyrelle McNew, from August 1 to September 30, 2011.

Response:

5. Copies of any and all policies, procedures, protocols or guidelines in place at OSUMC from 2011 to the present regarding the receiving of or returning of patient related phone calls applicable to the internal medicine department and/or Dr. Rothbaum's office, the surgery department and/or Dr. Husain's office, including but not limited to the documentation/recording of such phone calls, the type of information that should be obtained when receiving or responding to a patient related phone call and what subsequent steps an OSUMC employee should take upon receipt of a patient related phone call, including but not limited to policies, procedures, protocols or guidelines governing medical assistants, receptionists or other medical office staff personnel.

Response:

6. Copies of any and all exhibits Defendant intends to introduce into evidence at the trial of the within matter.

Response:

7. Copies of any and all medical literature which Defendant plans on establishing as "reliable authority" pursuant to Ohio Rules of Evidence 803(18) for use at trial.

Response:

COMBINED REQUESTS FOR ADMISSIONS AND INTERROGATORIES

1. Admit that documentation not otherwise produced herein, pertaining to phone calls placed by Michael or Cyrelle McNew to an employee or agent of this Defendant (including but not limited to the offices of Dr. Husain and/or Dr. Rothbaum) from August 12 to September 18, 2011 was destroyed.

ADMIT

DENY

2. Fully describe by date, author and the content/type/purpose of any and all documentation not otherwise produced herein, pertaining to phone calls placed by Michael or Cyrelle McNew to an employee or agent of this Defendant (including but not limited to the offices of Dr. Husain and/or Dr. Rothbaum) from August 12 to September 18, 2011, and the date such documentation was destroyed.

ANSWER:

3. Admit that Michael McNew placed a phone call to an employee and/or agent of this Defendant on the morning of September 17, 2011 at approximately 8:08 a.m.

ADMIT DENY

4. Admit that an employee and/or agents of this Defendant provided instructions by phone to Michael McNew to stop taking Tramadol due, in part to reporting bruising on September 17, 2011.

ADMIT DENY

5. Admit that Exhibit A is a fair and accurate copy of the telephone records of Michael and Cyrelle McNew and that such records are admissible under Rules of Evidence 803(6) as business records.

ADMIT DENY

6. Admit that telephone number 614-257-2264 was assigned to OSUMC Surgery Department as of September, 2011.

ADMIT DENY

7. Admit that OSUMC received a phone call from the McNews on September 18, 2011 at approximately 8:04 a.m.

ADMIT DENY

8. Admit that OSUMC received a phone call from the McNews on September 18, 2011 at approximately 2:08 p.m.

ADMIT

DENY

9. Admit that Dr. Husain called the McNews back on the afternoon of September 18, 2011 at approximately 2:32 p.m.

ADMIT

DENY

10. Admit that on September 18, 2011, Dr. Husain was told by Cyrelle McNew that Michael McNew was experiencing shortness of breath.

ADMIT

DENY

11. Admit that on September 18, 2011, Dr. Husain was told by Cyrelle McNew that Michael McNew had bruising on his arm.

ADMIT

DENY

Respectfully Submitted,



Daniel N. Abraham (0023457)
David I. Shroyer (0024099)
Colley, Shroyer & Abraham Co., LPA
536 South High Street, 2nd Floor
Columbus, OH 43215
(614) 228-6453
(614) 228-7122 (fax)
dabraham@csajustice.com
dshroyer@csajustice.com
Counsel for Plaintiff

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 8th day of December 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



Daniel N. Abraham (0023457)
David I. Shroyer (0024099)
Counsel for Plaintiff



Call Detail (Continued)

617-780-9641

User Name: MICHAEL MCNEW

Rate Code: RM45=450 Rollover Mins, 5KNW=5000 N&W
 Rate Period (PD): DT=Daytime, NW=Nwtknd

Item	Day	Date	Time	Number Called	Call To	Min	Rate Code	Rate Pd	Feature	Airtime Charge	LD/Add'l Charge	Total Charge
56		09/14	12:51PM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
57		09/14	1:00PM	614-210-7616	DUBLIN OH	5	RM45	DT				0.00
58		09/14	1:08PM	614-791-8450	DUBLIN OH	1	RM45	DT				0.00
59		09/14	1:08PM	614-210-6057	DUBLIN OH	2	RM45	DT				0.00
60		09/14	1:10PM	614-793-5145	DUBLIN OH	1	RM45	DT				0.00
61		09/14	1:11PM	614-791-8450	DUBLIN OH	2	RM45	DT				0.00
62		09/14	1:18PM	617-373-3943	BOSTON MA	1	RM45	DT				0.00
63		09/14	1:20PM	617-780-9641	INCOMI CL	3	RM45	DT				0.00
64		09/14	1:44PM	617-373-3943	BOSTON MA	7	RM45	DT				0.00
65		09/14	5:41PM	614-338-3104	DUBLIN OH	3	RM45	DT				0.00
66		09/14	5:09PM	617-780-9641	INCOMI CL	2	RM45	DT				0.00
67		09/14	9:01PM	508-668-7043	WALPOL MA	18	5KNW	NW				0.00
68	TUE	09/15	11:07AM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
69		09/15	11:08AM	614-793-5145	DUBLIN OH	1	RM45	DT				0.00
70		09/15	1:26PM	617-373-3943	BOSTON MA	4	RM45	DT				0.00
71		09/15	1:39PM	614-311-8067	DUBLIN OH	3	RM45	DT				0.00
72		09/15	5:11PM	614-338-3104	DUBLIN OH	1	RM45	DT				0.00
73		09/15	5:30PM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
74		09/15	5:31PM	614-793-5145	DUBLIN OH	1	RM45	DT				0.00
75		09/15	6:38PM	508-668-7043	WALPOL MA	10	RM45	DT				0.00
76		09/15	6:38PM	508-668-7043	WALPOL MA	10	RM45	DT				0.00
77	WED	09/16	9:11AM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
78		09/16	9:13AM	614-791-8450	DUBLIN OH	9	RM45	DT				0.00
79		09/16	9:22AM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
80		09/16	3:06PM	614-210-6057	DUBLIN OH	2	RM45	DT				0.00
81		09/16	7:19PM	508-668-7043	WALPOL MA	4	RM45	DT				0.00
82		09/16	8:16PM	508-668-7043	WALPOL MA	2	5KNW	NW				0.00
83	THU	09/17	8:33AM	614-257-2264	COLUMB OH	4	RM45	DT				0.00
84		09/17	8:33AM	617-780-9641	INCOMI CL	4	RM45	DT				0.00
85		09/17	12:22PM	617-780-9641	INCOMI CL	3	RM45	DT				0.00
86		09/17	5:41PM	617-373-4056	BOSTON MA	1	RM45	DT				0.00
87	FRI	09/18	8:04AM	614-257-2264	COLUMB OH	2	RM45	DT				0.00
88		09/18	8:37AM	617-373-3943	BOSTON MA	1	RM45	DT				0.00
89		09/18	2:08PM	614-257-2264	COLUMB OH	6	RM45	DT				0.00
90		09/18	2:32PM	617-780-9641	INCOMI CL	10	RM45	DT				0.00
91		09/18	4:18PM	617-780-9641	INCOMI CL	1	RM45	DT				0.00
92		09/18	6:38PM	508-668-7043	WALPOL MA	32	RM45	DT				0.00
93	SAT	09/19	8:27AM	617-780-9641	INCOMI CL	1	5KNW	NW				0.00
94		09/19	12:12PM	617-780-9641	INCOMI CL	4	5KNW	NW				0.00
Subtotal Minutes						307						0.00
Total						307						0.00

Data Detail

617-780-9641

User Name: MICHAEL MCNEW

Rate Code: CMB1=MEDIA MAX UNL MNET, TM1=Text Msg Pay Per Use
 Rate Period (PD): AT=Anytime
 Feature: GPRR=GPRS \$0.00 rate APN002, SMH=SMS per msg \$0.20 MOMT - PPU

Item	Day	Date	Time	To/From	Type	Msg/KB/Min	Rate Code	Rate Pd	Feature	In/Out	Total Charge
1	FRI	09/18	7:18AM	614-883-1000	Text Message	1 Msg	TM1	AT	SMH	In	0.20
2	MON	09/21	6:27PM	617-808-2482	MTM TEXT MESSAGE	1 Msg	TM1	AT	SMH	In	0.20
Subtotal of Msg's						2 Msg					0.40
3	SAT	09/19	7:52AM	Data Transfer	Data	7 KB	CMB1	AT	GPRR	Out	0.00
4		09/19	8:11AM	Data Transfer	Data	42 KB	CMB1	AT	GPRR	Out	0.00

IN THE COURT OF CLAIMS FOR THE STATE OF OHIO

MATTHEW RIES, Admr., et al.,

Plaintiff,

Case No. 2010-10335

vs.

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**THE OHIO STATE UNIVERSITY
MEDICAL CENTER,**

Defendant.

**PLAINTIFF'S (AMENDED) COMBINED FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS, REQUESTS FOR ADMISSION AND
INTERROGATORIES TO DEFENDANT**

Pursuant to the Ohio Rules of Civil Procedure governing discovery requests, Plaintiff hereby requests that the referenced Defendant produce and permit said Plaintiff to inspect, copy or photograph the following documents, admit or deny the following Requests for Admission and answer the following Interrogatories.. As directed by the Ohio Civil Rules Defendant shall serve written responses to this request within twenty eight (28) days of service hereof at the office of David I. Shroyer, Esq., Colley, Shroyer & Abraham Co., LPA. Copies of the requested documents may be attached to the written response.

DEFINITIONS

The term "document" as used herein means all writings of any kind, including, but not limited to, the original and all non-identical copies, whether different from originals by reason of notation made on such copies or otherwise; letters; books; manuals; telegrams; memoranda; tape recordings; records; reports; contracts; analysis; calendar or diary entries; notes; charges; diagrams; lists; minutes and records of meetings and conferences and



telephonic or other communications; and any other items from which information can be received with or without the use of detection devices in the possession, custody or control of Defendant, Defendant's representatives, attorneys or other persons acting for/on Defendant's behalf.

DOCUMENTS REQUESTED

1. Complete copy of all records pertaining to documentation from nurses/medical assistants/staff or other categories of personnel for phone calls from Michael or Cyrelle McNew to an employee or agent of this Defendant (including but not limited to the offices of Dr. Husain and/or Dr. Rothbaum) from August 1 to September 30, 2009, including but not limited to the following:

1. Phone call(s) that lead up to the August 27, 2009 nurse's visit via Dr. Rothbaum's office
2. Phone call(s) that led up to the September 14, 2009 visit with Dr. Rothbaum.
3. Phone call(s) that led up to the September 15, 2009 visit with Dr. Husain.
4. Any and all calls received from, or placed to, Michael or Cyrelle McNew on September 15, 2009
5. Any and all calls received from or placed to, Michael or Cyrelle McNew on September 16, 2009.
6. Any and all calls received from, or placed to, Michael or Cyrelle McNew on September 17, 2009.
7. Any and all calls received from, or placed to, Michael or Cyrelle McNew on September 18, 2009.

Response:

2. A complete copy of any and all office records, phone records, phone logs, metadata, emails, computer generated records, text messages, pager messages or other recorded or written data associated with any of the above-referenced calls.

Response:

3. A complete copy of any and all office records, phone records, phone logs, metadata, emails, computer generated records, text messages, pager messages or other recorded or written data from August 1 to September 30, 2009 associated with:

1. Dr. Husain's pager identified in his deposition as ending with 1372.
2. Dr. Husain's personal cell phone ending in 8813 as identified in his deposition.
3. Any other pager numbers or personal phone numbers associated with Dr. Husain

Response:

4. Logs, whether handwritten or maintained by computer or other recorded instrument, associated with any and all calls received from, or placed to, Michael or Cyrelle McNew, from August 1 to September 30, 2009.

Response:

5. Produce all itemized billing, insurance billing, patient statements, metadata and/or coding information/documentation for all contacts between OSUMC employees and/or agents and Mr. and Mrs. McNew in August/September, 2009, including but not limited to actual office visits or phone contacts, including but not limited to the August 27, 2009 "Nurse Visit".

Response:

6. Copies of any and all policies, procedures, protocols or guidelines in place at OSUMC from 2009 to the present regarding the receiving of or returning of patient related phone calls applicable to the internal medicine department and/or Dr. Rothbaum's office, the surgery department and/or Dr. Husain's office, including but not limited to the documentation/recording of such phone calls, the type of information that should be obtained when receiving or responding to a patient related phone call and what subsequent steps an OSUMC employee should take upon receipt of a patient related phone call, including but not limited to policies, procedures, protocols or guidelines governing medical assistants, receptionists or other medical office staff personnel.

Response:

7. Copies of any and all exhibits Defendant intends to introduce into evidence at the trial of the within matter.

Response:

8. Copies of any and all medical literature which Defendant plans on establishing as "reliable authority" pursuant to Ohio Rules of Evidence 803(18) for use at trial.

Response:

COMBINED REQUESTS FOR ADMISSIONS AND INTERROGATORIES

1. Admit that documentation not otherwise produced herein, pertaining to phone calls placed by Michael or Cyrelle McNew to an employee or agent of this Defendant (including but not limited to the offices of Dr. Husain and/or Dr. Rothbaum) from August 12 to September 19, 2009 was destroyed.

ADMIT

DENY

2. Fully describe by date, author and the content/type/purpose of any and all documentation not otherwise produced herein, pertaining to phone calls placed by Michael or Cyrelle McNew to an employee or agent of this Defendant (including but not limited to the offices of Dr. Husain and/or Dr. Rothbaum) from August 12 to September 19, 2009, and the date such documentation was destroyed.

ANSWER:

3. Admit that Michael McNew placed a phone call to an employee and/or agent of this Defendant on the morning of September 17, 2009 at approximately 8:08 a.m.

ADMIT

DENY

4. Admit that an employee and/or agents of this Defendant provided instructions by phone to Michael McNew to stop taking Tramadol due, in part to reporting bruising on September 17, 2009.

ADMIT DENY

5. Admit that Exhibit A is a fair and accurate copy of the telephone records of Michael and Cyrelle McNew and that such records are admissible under Rules of Evidence 803(6) as business records.

ADMIT DENY

6. Admit that telephone number 614-257-2264 was assigned to OSUMC Surgery Department as of September, 2009.

ADMIT DENY

7. Admit that OSUMC received a phone call from the McNews on September 18, 2009 at approximately 8:04 a.m.

ADMIT DENY

8. Admit that OSUMC received a phone call from the McNews on September 18, 2009 at approximately 2:08 p.m.

ADMIT DENY

9. Admit that Dr. Husain called the McNews back on the afternoon of September 18, 2009 at approximately 2:32 p.m.

ADMIT

DENY

10. Admit that on September 18, 2009, Dr. Husain was told by Cyrelle McNew that Michael McNew was experiencing shortness of breath.

ADMIT

DENY

11. Admit that on September 18, 2009, Dr. Husain was told by Cyrelle McNew that Michael McNew had bruising on his arm.

ADMIT

DENY

Respectfully Submitted,

/s/ Daniel N. Abraham

Daniel N. Abraham (0023457)

David I. Shroyer (0024099)

Colley, Shroyer & Abraham Co., LPA

536 South High Street, 2nd Floor

Columbus, OH 43215

(614) 228-6453

(614) 228-7122 (fax)

dabraham@csajustice.com

dshroyer@csajustice.com

Counsel for Plaintiff

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 December 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

/s/ Daniel N. Abraham

Daniel N. Abraham (0023457)

David I. Shroyer (0024099)

Counsel for Plaintiff



Call Detail (Continued)

617-780-9641

User Name: MICHAEL MCNEW

Rate Code: RM45=460 Rollover Mins, 5KNW=5000 N&W /
 Rate Period (PD): DT=Daytime, NW=Nwkd

Item	Day	Date	Time	Number Called	Call To	Min	Rate Code	Rate Pd	Feature	Airtime Charge	LD/Add'l Charge	Total Charge
56		09/14	12:51PM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
57		09/14	1:00PM	614-210-7616	DUBLIN OH	5	RM45	DT				0.00
58		09/14	1:08PM	614-791-6450	DUBLIN OH	1	RM45	DT				0.00
59		09/14	1:08PM	614-210-6057	DUBLIN OH	2	RM45	DT				0.00
60		09/14	1:10PM	614-793-5145	DUBLIN OH	1	RM45	DT				0.00
61		09/14	1:11PM	614-791-6450	DUBLIN OH	2	RM45	DT				0.00
62		09/14	1:18PM	617-373-3943	BOSTON MA	1	RM45	DT				0.00
63		09/14	1:20PM	617-780-9641	INCOMI CL	3	RM45	DT				0.00
64		09/14	1:44PM	617-373-3943	BOSTON MA	7	RM45	DT				0.00
65		09/14	3:31PM	614-330-3104	DUBLIN OH	3	RM45	DT				0.00
66		09/14	5:09PM	617-780-9641	INCOMI CL	2	RM45	DT				0.00
67		09/14	9:01PM	508-668-7043	WALPOL MA	18	5KNW	NW				0.00
68	TUE	09/15	11:07AM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
69		09/15	11:08AM	614-793-5145	DUBLIN OH	1	RM45	DT				0.00
70		09/15	1:28PM	617-373-3943	BOSTON MA	4	RM45	DT				0.00
71		09/15	1:38PM	614-310-0057	DUBLIN OH	2	RM45	DT				0.00
72		09/15	5:30PM	614-330-3104	DUBLIN OH	1	RM45	DT				0.00
73		09/15	5:30PM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
74		09/15	5:31PM	614-793-5145	DUBLIN OH	1	RM45	DT				0.00
75		09/15	6:38PM	508-668-7043	WALPOL MA	19	RM45	DT				0.00
76	WED	09/16	8:11AM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
77		09/16	9:13AM	614-791-6450	DUBLIN OH	9	RM45	DT				0.00
78		09/16	9:22AM	614-210-7616	DUBLIN OH	1	RM45	DT				0.00
79		09/16	3:06PM	614-210-6057	DUBLIN OH	2	RM45	DT				0.00
80		09/16	7:18PM	508-668-7043	WALPOL MA	4	RM45	DT				0.00
81		09/16	9:10PM	508-668-7043	WALPOL MA	2	5KNW	NW				0.00
82	THU	09/17	8:04AM	614-257-2264	COLUMB OH	2	RM45	DT				0.00
83		09/17	9:03AM	617-780-9641	INCOMI CL	4	RM45	DT				0.00
84		09/17	12:20PM	617-780-9641	INCOMI CL	3	RM45	DT				0.00
85		09/17	5:11PM	617-373-4056	BOSTON MA	1	RM45	DT				0.00
86	FRI	09/18	8:04AM	614-257-2264	COLUMB OH	2	RM45	DT				0.00
87		09/18	8:37AM	617-373-3943	BOSTON MA	1	RM45	DT				0.00
88		09/18	2:08PM	614-257-2264	COLUMB OH	6	RM45	DT				0.00
89		09/18	2:32PM	617-780-9641	INCOMI CL	10	RM45	DT				0.00
90		09/18	4:18PM	617-780-9641	INCOMI CL	1	RM45	DT				0.00
91		09/18	5:38PM	508-668-7043	WALPOL MA	32	RM45	DT				0.00
92	SAT	09/19	8:28AM	617-780-9641	INCOMI CL	1	5KNW	NW				0.00
93		09/19	12:12PM	617-780-9641	INCOMI CL	4	5KNW	NW				0.00
Subtotal Minutes						307						0.00
Total						307						0.00

Data Detail

617-780-9641

User Name: MICHAEL MCNEW

Rate Code: CMB1=MEDIA MAX UNL MNET, TMI1=Text Msg Pay Per Use
 Rate Period (PD): AT=Anytime
 Feature: GPRR=GPRS \$0.00 rate APN002, SMH=SMS per msg \$0.20 MO/MT - PPU

Item	Day	Date	Time	To/From	Type	Msg/KB/Min	Rate Code	Rate Pd	Feature	In/Out	Total Charge
1	FRI	09/18	7:18AM	614-823-1000	Text Message	1 Msg	TMI1	AT	SMH	In	0.20
2	MON	09/13	6:27PM	617-808-3482	MTM TEXT MESSAG	1 Msg	TMI1	AT	SMH	In	0.20
Subtotal of Msg's						2 Msg					0.40
3	SAT	09/19	7:32AM	Data Transfer	Data	7 KB	CMB1	AT	GPRR	Out	0.20
4		09/19	8:14AM	Data Transfer	Data	42 KB	CMB1	AT	GPRR	Out	0.00