

**ORIGINAL**

2015 FEB -3 AM 10:42

IN THE COURT OF CLAIMS OF THE STATE OF OHIO

**ANN M. HIGGS**

Plaintiff,

-vs-

**UNIVERSITY OF TOLEDO  
MEDICAL CENTER**

Defendant.

Case No.: 2013-00576

Judge Patrick M. McGrath

**NOTICE OF FILING**  
**DEPOSITION TRANSCRIPT OF**  
**JIANLIN TANG, M.D.**

Trial Counsel:

Robert M. Scott (0006643)  
Lafferty, Gallagher & Scott, LLC  
416 North Erie Street, Suite 400  
Toledo, OH 43604-5622  
(419) 241-5500  
(419) 245-3849 (Facsimile)

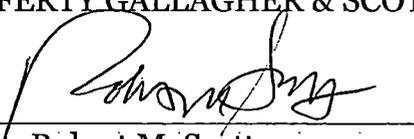
Attorney for Plaintiff

Now comes the Plaintiff, by and through her counsel, and hereby gives Notice of the Filing of the Transcript of the Deposition of Jianlin Tang, M.D., taken August 20, 2014.

Respectfully submitted,

LAFFERTY GALLAGHER & SCOTT, LLC

By

  
Robert M. Scott  
Attorney for Plaintiff

**LAFFERTY,  
GALLAGHER &  
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**ON COMPUTER**

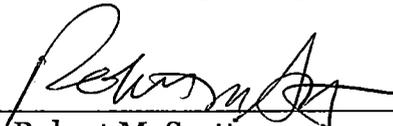
**CERTIFICATE OF SERVICE**

This will certify that the foregoing Notice of Filing Deposition Transcript of Jianlin Tang, M.D., was served by ordinary U.S. Mail this 2<sup>nd</sup> day of January 2015 upon the following:

Anne Berry Strait  
Assistant Attorney General  
Court of Claims Defense Section  
150 East Gay Street, Floor 18  
Columbus, OH 43215  
Attorney for Defendant

Respectfully submitted,

LAFFERTY GALLAGHER & SCOTT, LLC

By 

Robert M. Scott  
Attorney for Plaintiff

**LAFFERTY,  
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LAFFERTY, GALLAGHER & SCOTT, LLC

*Your Bridge Through Difficult Times*

ATTORNEYS AT LAW

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January 23, 2015

Clerk of Courts  
Court of Claims of Ohio  
The Ohio Judicial Center  
65 S. Front, Third Floor  
Columbus, OH 43215

Re: *Ann M. Higgs v. UTMC*  
Case No.: 2013-00576  
Our File No.: 4689

Dear Clerk:

Please find enclosed the original and several copies of *Notice of Filing Deposition Transcript of Jianlin Tang, M.D.*

Please file in your usual manner and return any unused file-stamped copies in the enclosed self-addressed, postage-paid envelope. *RMS*

Thank you for your assistance in this matter.

Sincerely,

LAFFERTY, GALLAGHER & SCOTT, LLC

By *Robert M. Scott*  
Robert M. Scott  
(419) 241-5500, Ext. 113

RMS/nmp  
Enclosures  
cc: Ann Berry Strait, Esq.