

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

2015 FEB 18 PM 3:03

IN THE COURT OF CLAIMS OF OHIO

MATTHEW RIES, Admr., et al.,	:	
	:	
Plaintiffs	:	
v.	:	Case No. 2010-10335
THE OHIO STATE UNIVERSITY	:	Judge Patrick M. McGrath
MEDICAL CENTER,	:	
Defendant	:	

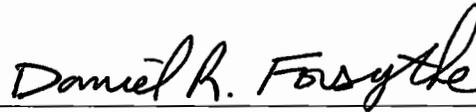
**DEFENDANT’S MOTION TO KEEP UNDER SEAL
PLAINTIFFS’ NOTICE OF RESERVATION OF RIGHTS
TO CONDUCT DEPOSITION, FILED FEBRUARY 17, 2015**

Defendant, The Ohio State University Medical Center (“OSUMC”), hereby moves this Court for an Order placing under seal plaintiffs’ recently filed *Notice of Reservation of Rights to Conduct Deposition of Mark Bush, LPN*, due to the personal and private nature of the information contained within that filing. Mr. Bush is a former OSUMC employee who treated plaintiff’s decedent, and whose name appeared in decedent’s medical records which were presumably obtained by plaintiffs prior to the filing of this lawsuit. Plaintiffs apparently do not object to the reasons that Mr. Bush is not currently available for a deposition, but merely reserve the right to take his deposition at a later date if his circumstances later change and he is able to participate in a deposition. However, plaintiffs’ *Notice* included personal and private health information regarding Mr. Bush – who is a non-party to this action – including a letter from one of his health providers. To protect Mr. Bush’s privacy, OSUMC respectfully requests that plaintiffs’ recently filed *Notice* be placed under seal

ON COMPUTER

Respectfully Submitted,

MICHAEL DEWINE
Attorney General of Ohio

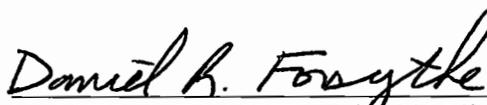


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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Defendant's Motion to Keep Under Seal* was sent by regular U.S. Mail, postage prepaid, this 18th day of February, 2015 to:

David I. Shroyer
Daniel N. Abraham
536 South High Street
Columbus, Ohio 43215
Counsel for Plaintiff



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