

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

IN THE COURT OF CLAIMS OF OHIO

2015 MAR 11 PM 3:29

DARLENE LANE FERRARO

Plaintiff

v.

THE OHIO STATE UNIVERSITY  
MEDICAL CENTER

Defendant

CASE NO. 2011-10371

JUDGE PATRICK M. McGRATH

MAGISTRATE  
ROBERT VAN SCHOYCK

**DEFENDANT'S MOTION FOR LEAVE TO FILE REPLY REGARDING OHIO  
DEPARTMENT OF REHABILITATION AND CORRECTION RECORDS**

Defendant, The Ohio State University Medical Center ("OSUMC"), respectfully requests leave to file a Reply regarding its request to this Court to order the Ohio Department of Rehabilitation and Correction ("ODRC") to produce records related to Junior Lee Lane. The plaintiff has agreed to waive her objections to the release of certain records, yet presents arguments in opposition to the other records which address only half of what is at issue in this case. The plaintiff also asserts that OSUMC seeks the records for improper purposes, requiring a response.

Accordingly, OSUMC should be granted leave to file a reply.

**ON COMPUTER**

Respectfully submitted,

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Ohio Attorney General



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CERTIFICATE OF SERVICE

On March 11, 2015, a copy of this document was served via regular mail on the following:

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