

IN THE COURT OF CLAIMS  
FOR THE STATE OF OHIO

FILED  
COURT OF CLAIMS  
OF OHIO

2015 JUL 14 AM 10:40

**ORIGINAL**

RICKY JACKSON

Plaintiff,

v.

THE STATE OF OHIO

Defendant.

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:  
: Case No: 2015-00127-WI  
:  
: Judge Patrick M. McGrath  
:  
:  
:  
:

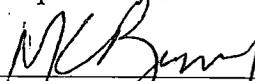
**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF EXPERT  
REPORT DEADLINES**

Plaintiff Ricky Jackson, by and through counsel, respectfully requests this Court to extend the July 15, 2015 deadline for Plaintiff's expert reports by sixty days to September 15, 2015. Plaintiff has been diligently attempting to obtain records from various sources, but it is quite time consuming to gather records dating back as far as the early 1970s. The records obtained by Plaintiff's counsel from the Ohio Department of Corrections & Rehabilitation (ODRC) are incomplete, and other government agencies still have not responded to Plaintiff's records requests. These records are necessary for Plaintiff's expert in the area of economic losses to properly conduct an assessment.

Defendant's expert reports are currently due on August 17, 2015. Therefore, Jackson proposes that the Defendant's expert report deadline be extended until October 15, 2015 to allow the Defendant's expert time to review Plaintiff's expert report.

Counsel for Defendant State of Ohio does not oppose this motion.

Respectfully submitted,



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*Attorney for Plaintiff Ricky Jackson*

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2015, a copy of the foregoing was filed and has been served by email to the following:

Amy Brown  
Pete DeMarco  
Ohio Attorney General's Office  
Court of Claims Defense Section  
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Michele L. Berry  
Attorney for Plaintiff Ricky Jackson



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July 13, 2015

Court of Claims of Ohio  
Clerk of Courts  
65 South Front St.  
Columbus, OH 43215

Re: *Ricky Jackson v. State of Ohio (Case No. 2015-00127-WI)*

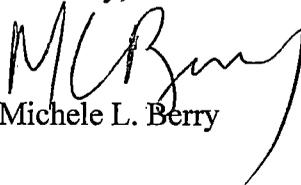
Dear Clerk of Courts,

Please find enclosed the original and one copy of the following for filing in the above referenced case:

- Plaintiff's Unopposed Motion to Extend Expert Report Deadline

Thank you for your assistance.

Sincerely,

  
Michele L. Berry