

Wooldridge, John

From: Heim, Kimber
Sent: Wednesday, February 16, 2022 6:41 AM
To: Wooldridge, John; Corinna Efke; Justine Allen; Miller, Jared
Subject: RE: FAI 037, 110412, Pcl 1 & 2 / ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - Discovery Mtg w/Landowner's Counsel

What a great email for the morning. Sounds like an agreement is going to be in our future.

I have the photos organized for printing...no worries. Would take me a day to put together the Red Book, if requested.

Thanks ladies...good to know same attorney for both parcels.

Kimber L. Heim

Realty Specialist Manager
ODOT – District 5
9600 Jacksontown Road
Jacksontown, OH 43030
Ph: 740-323-5422 (direct) Cell: 740-814-0708
FAX: 740-323-5125



From: Wooldridge, John <John.Wooldridge@dot.ohio.gov>
Sent: Tuesday, February 15, 2022 5:12 PM
To: Corinna Efke <Corinna.Efke@OhioAGO.gov>; Heim, Kimber <Kimber.Heim@dot.ohio.gov>; Justine Allen <Justine.Allen@OhioAGO.gov>; Miller, Jared <Jared.Miller@dot.ohio.gov>
Subject: RE: FAI 037, 110412, Pcl 1 & 2 / ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - Discovery Mtg w/Landowner's Counsel

Thanks Corinna,

We appreciate the updates. Here are my thoughts:

- If you have an opinion about mediators, please advise.
 - D5 has used Frank Ray to successfully mediate before and we do not have an objection to him. I recall he demands a lot of front end effort before the mediation (statements, etc.).
 - I am unfamiliar with John Alton but have no reason to exclude his use.
 - We have worked with Frank Hinkle as an Appraiser before (but not mediator). I could see value in his Appraisal AND Attorney background given the issue seems to be solely based on the valuation.
- If you know the time-frame for the structure removal, please advise.
 - Contract awarded to the Shelly Company on 1/20/22. They are approved to begin construction (including demo) on 4/1/22. Please let me know if you would like for me to inquire with construction as to a more specific time frame (it will be towards the beginning

of project as it needs removed to do the drainage grading which is done before roadway or signalization, etc.).

- You might want to hold-off on the redbook process.
 - Kimber has all the electronic photos. She can prepare the 'redbook' at any time without losing the opportunity (she could just provide the files if that is the best evidence for the case). She can hold.

I do not have any questions. We will review appraisals when available and entertain counter offers if provided through your office. Thanks and have a great evening.

Respectfully,

John R. Wooldridge

Real Estate Administrator

ODOT District 5

9600 Jacksontown Road, Jacksontown, OH 43030

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**OHIO DEPARTMENT OF
TRANSPORTATION**

From: Corinna Efke <Corinna.Efke@OhioAGO.gov>

Sent: Tuesday, February 15, 2022 4:42 PM

To: Wooldridge, John <John.Wooldridge@dot.ohio.gov>; Heim, Kimber <Kimber.Heim@dot.ohio.gov>; Justine Allen <Justine.Allen@OhioAGO.gov>; Miller, Jared <Jared.Miller@dot.ohio.gov>

Subject: FAI 037, 110412, Pcl 1 & 2 / ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - Discovery Mtg w/Landowner's Counsel

Good afternoon!

Justine and I had a telephone meeting with opposing counsel this afternoon for parcels 1 and 2 to discuss our discovery plan as required by the civil rules.

Opposing counsel is the same person for both parcels and the discovery plan is due to the court by March 10, 2022.

During the meeting, opposing counsel indicated he did not have a counteroffer for us yet, because he has not received the final appraisal reports from his appraiser yet. He did state, rather surprisingly, that he did not think this would be a case of large damages, but rather an issue of differing land values. He thinks his reports will come back within a range that would make settlement a possibility.

We then discussed scheduling this matter for mediation. He suggested we mediate sometime in March, however I suggested we look into April (knowing that we will not have our full appraisals back until then. We did not disclose that we are having full appraisals done). He recommended using Frank Ray or John Alton for the mediator. I suggested Frank Hinkle. We agreed to revisit which mediator we would use at a later date.

Next, I let him know that ODOT was putting together a redbook for the structure on Parcel 1. He stated he would consider agreeing to a waiver of the redbook requirement if we could provide him with the date/time-frame of its removal.

Finally, we agreed that the deadlines provided by the court are still attainable by both parties, so we would not need to request any altering of deadlines at this time. Opposing counsel requested we block out some time over the summer for depositions, just in case we are unable to settle and our calendars fill up, but I thought that doing that was a bit premature.

- If you have an opinion about mediators, please advise.
- If you know the time-frame for the structure removal, please advise.
- You might want to hold-off on the redbook process.

I will update you as soon as we receive landowner's appraisals for these parcels.

Please let me know if you have any questions –

Thanks,
Corinna

From: Corinna Efke <Corinna.Efke@OhioAGO.gov>

Sent: Wednesday, February 9, 2022 12:08 PM

To: John.Wooldridge@dot.ohio.gov; Kimber.Heim@dot.ohio.gov; Justine Allen <Justine.Allen@OhioAGO.gov>; Jared.Miller@dot.ohio.gov

Subject: FW: FAI 037, 110412, Pcl 1 & 2 / ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - Additional Information for Appraisals

Just to close the loop for you – Jeff responded and confirmed receipt of the documents provided. He will reach out if he requires anything additional. See below.

Thanks,
Corinna

From: Jeffrey Helbig <jhelbig@irr.com>

Sent: Tuesday, February 8, 2022 5:03 PM

To: Corinna Efke <Corinna.Efke@OhioAGO.gov>

Subject: RE: FAI 037, 110412, Pcl 1 & 2 / ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - Additional Information for Appraisals

Corinna,

I have downloaded the information from the ftp site. I will contact you if any questions occur during review of the documents.

Thanks again,

Jeffrey R. Helbig

Director

Integra Realty Resources

6233 Riverside Drive, Suite 2N, Dublin, OH 43017

T 614.398.4319

From: Corinna Efkean <Corinna.Efkean@OhioAGO.gov>

Sent: Tuesday, February 08, 2022 4:24 PM

To: Jeffrey Helbig <jhelbig@irr.com>

Cc: John.Wooldrige@dot.ohio.gov; Kimber.Heim@dot.ohio.gov; Justine Allen <Justine.Allen@OhioAGO.gov>; Jared.Miller@dot.ohio.gov

Subject: FAI 037, 110412, Pcl 1 & 2 / ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - Additional Information for Appraisals

Jeff –

Thank you for meeting with us to discuss the appraisals for FAI 37-06.10, 110412, Parcels 1 and 2.

As requested, please find all the plans, legal descriptions, titles, and other information for your use. The items were all saved to the FTP site as the total size of files exceeds the send or receive limits. Please note that the plans called “110412_Confirmed.pdf” are from 1/31/22 and are the most current and accurate; they also include the final R/W Plans.

<ftp://ftp.dot.state.oh.us/pub/districts/d05/Projects/FAI/110412/Real%20Estate/>

Additionally, to the best of ODOT’s knowledge; no utility work (or any other work) has been performed on the Parcel 1 or Parcel 2. Utilities just approved a permit and that work will begin in the near future, but not yet started. Therefore, I believe the date of valuation should be the date of accompaniment for your report.

Please let us know if you need anything additional.

Thanks,

Corinna

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