

Memo



To: Greg Baird, PE
From: Tom Barnitz, PE *AB*
Date: June 8, 2011
Re: Court of Claims Case 2011-03332, Risner v. ODOT


Please respond to the attached request and respond to Troy Huff by the required date.

Copy me on your responses.

Greg, 6/13
Talked to Beth. She
said we can refer them
to ODPS for crash
data.

Thanks,
Patricia

Greg, 6/15
Troy asked me about
this. He has request a
response to this. I informed
him that I didn't think
we had any questions to
answer, but would still
like a response. I typed
up one for you if you want

to use it... I wanted
you to review it first.
It's on ~~the~~ :
J: /Traffic/Pike/SK32/
SK32-2201
2011-06-16 Response to
request IOC
Feel free to change it in
any way.  Thank! Patricia



OHIO DEPARTMENT OF TRANSPORTATION
INTER-OFFICE COMMUNICATION
DISTRICT 9

TO: Tom Barnitz, P.E., Office of Planning and Engineering Administrator
FROM: J. Troy Huff, HMA
DATE: June 7, 2011
SUBJECT: Court of Claims Case 2011-03332, Risner v. ODOT

Please find attached Plaintiff's First Set of Interrogatories and Request for Production of Documents for the above case. I ask that your department answer these questions since they provided the district's first report answers to Barb Harsha.

There is an Affidavit that needs to be signed and notarized by the individual(s) who answered these questions. Keep in mind, this individual may be called as a witness at trial if this case goes that far.

I should receive your answer by June 14, 2011 since I must provide our formal response to Vicki by **June 16, 2011**.

J.T.H.
JTH:jth

Attachment

c: file



Vicki
Shawger/ChiefLegal/CEN/O
DOT

06/01/2011 10:18 AM

To Troy Huff/Highway/D09/ODOT@ODOT

cc

bcc

Subject Fw: Risner v. ODOT 2011-03332

Please find attached Plaintiff's First Set of Interrogatories and Request for Production of Documents. I have read over the questions and marked out the ones that you don't need to answer. This may seem like a duplication from the initial, investigation report but plaintiff's attorney has not seen those documents yet. If you cannot do the accident history for the first two questions, let me know.

If you have any questions, you can get in touch with AAG Amy Brown at 614-466-7447.

There is an Affidavit that needs to be signed and notarized by the individual(s) who answered these questions. Keep in mind, this individual may be called as a witness at trial if this case goes that far.

Please send in **two copies** of your documents and mark which question they are answering.

We should have the answers to these questions by **June 16, 2011**.

Vicki Shawger, Ct of Claims Coordinator
(614) 466-2728
Toll free: 1-888-644-0308
Fax - (614)387-7431

----- Forwarded by Vicki Shawger/ChiefLegal/CEN/ODOT on 06/01/2011 10:05 AM -----



"Beth A. Smith"
<beth.smith@ohioattorneyg
eneral.gov>

05/31/2011 04:39 PM

To "Vicki.Shawger@dot.state.oh.us"
<Vicki.Shawger@dot.state.oh.us>

cc

Subject Risner v. ODOT 2011-03332

Vicki,

Attached is discovery that Amy received in this case . She asked me to get draft responses together . Do you know who would be most knowledgeable at District 9?

I have attached the Complaint for your convenience .

Thank you,

Beth A. Smith

Beth A. Smith, Paralegal
Court of Claims Defense Section
Ohio Attorney General Mike DeWine
150 E. Gay Street, 18th Floor
Columbus, OH 43215
Telephone: (614) 466-7447
Fax: (866) 400-5013

e-mail: beth.smith@ohioattorneygeneral.gov

CONFIDENTIALITY NOTICE: This correspondence is intended only for the person or entity to which it is addressed. It may be confidential, subject to attorney-client privilege or otherwise exempt from disclosure. Do not forward or share this message without the sender's permission. If you are not the intended recipient, please contact the sender by replay e-mail and destroy all copies of the original message.



Plaintiffs_ROG_RPD_to_ODOT.pdf



Risner Complaint.pdf



affidavit.doc

Concerning your request for crash data, the Ohio Department of Transportation is merely a user of accident data, and defers to the Ohio Department of Public Safety in reporting crash information to third parties. By law, the Department of Public Safety is the agency responsible for obtaining, maintaining, and disseminating crash information for the State of Ohio.

http://www.ohiopublicsafety.com/crashes/reference_material.asp

ODPS Crash Media Requests - Communications: (614) 466-4344

Here is the standard
response we have
for crash data.
This is saved on
J drive