

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

LACRESHA HINTON,	:	
	:	
Plaintiff,	:	JUDGE COCROFT
	:	
vs.	:	CASE NO. 13-CV-013010
	:	
DOWNTOWN GYNECOLOGISTS, INC., et al.,	:	PLAINTIFF'S MOTION TO
	:	COMPEL DEFENDANT TO
Defendants.	:	ANSWER DISCOVERY

PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO ANSWER DISCOVERY

Now comes the Plaintiff, Lacresha Hinton, by and through counsel, and hereby moves the Court to compel Defendant Harley Blank to answer the discovery that was submitted on August 4, 2014, but which has not been turned over. A Memorandum in Support follows.

Respectfully Submitted,

/s/ Philip W. Gerth, Esq.
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Counsel for Plaintiff

MEMORANDUM IN SUPPORT

This is a case for medical malpractice. On August 4, 2014, counsel for Plaintiff mailed and emailed the Plaintiff's First Set of Interrogatories and Request for Production of Documents to Defendant Harley Blank. The discovery request was sent to counsel for Defendants. On August 28, 2014, counsel for Defendant informed counsel for Plaintiff that Dr. Blank's wife had deceased, and asked for an additional ten days. Counsel for Plaintiff was sympathetic and agreed to extend the deadline the requested ten days. Counsel for Defendant requested a second

extension until September 26th, and counsel for Plaintiff agreed to said extension. On September 24th, counsel for Defendant admitted that Dr. Blank was distraught and that they were trying to work with Dr. Blank. September 26th came and went and there was no discovery.

Counsel for Plaintiff wishes to extend his condolences to Dr. Blank; it is understood that the loss of a spouse is one of the most crushing things that one can face. However, it should be noted that this case cannot come to an indefinite halt because of this. Extensions have already been granted. Nobody is angry at Defendant Harley Blank; Plaintiff just needs answers. Court deadlines continue to come and go in this case.

WHEREFORE, Plaintiff motions that Defendant Harley Blank be immediately compelled to turn over the requested documents that were asked for in Plaintiff's First Set of Interrogatories and Request for Production of Documents dated August 4, 2014.

Respectfully Submitted,

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

Counsel for Plaintiff hereby certifies that a copy of the foregoing was sent via
Court e-notice, on this 6th day of October, 2014 to the following:

Barry Wolinetz
Amanda Baker
Kelly Wick
250 Civic Center Drive #100
Columbus, OH 43215
Counsel for Defendants

Respectfully Submitted,

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