

In the
Supreme Court of Ohio

STATE EX REL. KENT LANHAM,

Relator,

v.

DANNY R. BUBP, STATE
REPRESENTATIVE

Respondent.

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: Case Number 2012-0131
:
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: Original Action in Mandamus
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:
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RULE 26(C) STATEMENT OF COUNSEL

Pursuant to Civ. R. 26(C), undersigned counsel states that she had two telephone conversations with counsel for Relator in an attempt to avoid the deposition of Danny R. Bulp, that counsel explained that depositions of lower level employees could be arranged, or at least arranged first, and that any privileged materials could be produced for *in camera* review. Relator's counsel was not persuaded, thus necessitating the motion filed simultaneously herewith.

MICHAEL DEWINE
Ohio Attorney General



Jeffery W. Clark (0017319)

**Counsel of Record*

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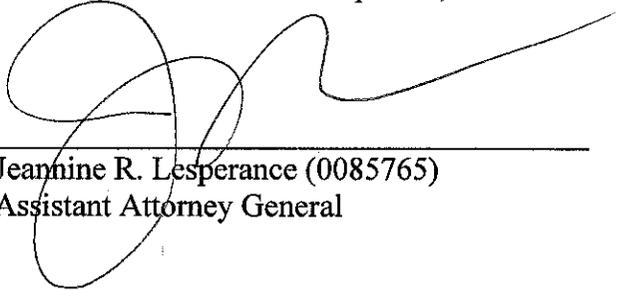
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Attorneys for Respondent

Danny R. Bulp, State Representative

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Protective Order and Memorandum in Support was sent by electronic mail and U.S. mail on April 16, 2012 to:



Jeannine R. Lesperance (0085765)
Assistant Attorney General