



The person's title and business or professional affiliation, if any, as of the time of to which the answer relates; and  
the person's title and business or professional and residence addresses.

### **INSTRUCTIONS**

1. You are required by Rule 33 of the Ohio Rules of Civil Procedure to:
  - (a) Answer fully and factually each of the interrogatories hereinafter set out.
  - (b) Furnish all information called for by said interrogatory.
  - (c) Sign your response.
  - (d) Swear to your response.
  - (e) Serve same on the undersigned attorney within twenty-eight (28) days after the date of service of these interrogatories.
2. If you object to, or otherwise decline to answer, any portion of an interrogatory, provide all information called for in that portion of the interrogatory to which you do not object of which you do not decline to answer. If you object to an interrogatory on the grounds that to provide an answer would constitute an undue burden, provide such requested information as can be supplied without undertaking an undue burden. For those portions of any interrogatory to which you object or otherwise decline to answer, state the reason for such objection or declination.
3. The applicable period of time, unless otherwise provided, shall be from the date of employment of Plaintiff Allen Sykaluk to date of answering these interrogatories.
4. If any answer is refused in whole or in part, on the basis of a claim of privilege or exemption, state the following:
  - (a) The nature of the privilege or exemption claimed;

- (b) The general nature of the matter withheld (e.g. substance of conversation of the withheld information, name of originator);
- (c) Name(s) of person(s) to whom the information has been imparted; and
- (d) The extent, if any, to which the information will be provided subject to the privilege or exemption.

INTERROGATORY NUMBER 1:

Please identify all persons who have provided information in answering these Interrogatories, including the title of each position, and the number of the interrogatory that the person contributed to.

ANSWER:

INTERROGATORY NUMBER 2:

Please identify the specific subject matter, including any documents, videos, pictures, ESI, of Annie Sykaluk, as it relates to the family member of Plaintiff, as provided in your Initial Disclosures.

ANSWER:

INTERROGATORY NUMBER 3:

Please identify the specific subject matter, including any documents, videos, pictures, ESI, of Wendy Jones, as it relates to her employment at University Hospital Main Campus, as provided in your Initial Disclosures.

ANSWER:

INTERROGATORY NUMBER 4:

Please identify the specific subject matter, including any documents, videos, pictures, ESI, of Mary Dimond, as it relates to her employment at University Hospital Main Campus, as provided in your Initial Disclosures.

ANSWER:

INTERROGATORY NUMBER 5:

Please identify the specific subject matter, including any documents, videos, pictures, ESI, of Ricky Martin, as it relates to his employment at University Hospital Main Campus, as provided in your Initial Disclosures.

ANSWER:

INTERROGATORY NUMBER 6:

Please identify the dates sent, the recipient, the sender, and the specific subject matter, of all X-rays, as provided in your Initial Disclosures category of Electronic Stored Information (Initial Disclosures – Documents, ESI, and Tangible Items in the Possession of Defendant).

ANSWER:

INTERROGATORY NUMBER 7:

Please identify the creator, length, location, and persons shown, of all medical records, as provided in your Initial Disclosures category of Electronic Stored Information (Initial Disclosures – Documents, ESI, and Tangible Items in the Possession of Defendant).

ANSWER:

INTERROGATORY NUMBER 8:

Please identify the contents contained in the Radiologist report, as provided in your Initial Disclosures category of Electronic Stored Information (Initial Disclosures – Documents, ESI, and Tangible Items in the Possession of Defendant).

ANSWER:

INTERROGATORY NUMBER 9:

Please identify the date of issue, the effective date, and the expiration date of the Employee Policy Manual, as provided in your Initial Disclosures category of Electronic Stored Information (Initial Disclosures – Documents, ESI, and Tangible Items in the Possession of Defendant).

ANSWER:

INTERROGATORY NUMBER 10:

Please identify the date of issue, the effective date, the expiration date, the Insurance Company, the Policy Number, of the Insurance Company that provides liability coverage, as provided in your initial Disclosures category of Insurance.

ANSWER:

**VERIFICATION FOR ANSWER/RESPONSE TO INTERROGATORIES**

I certify under penalty of perjury under the laws of the State of Ohio that the foregoing Answers/Responses to the above Interrogatories are true and correct.

\_\_\_\_\_  
Defendant's Name

\_\_\_\_\_  
Defendant's Signature

\_\_\_\_\_  
Date

Respectfully Submitted,  
SYKALUK LAW LLC

/s/ Axel Sykaluk  
By: Axel Sykaluk (0021968)  
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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

A copy of the foregoing was sent via email, this 24<sup>st</sup> day of June 2023, to:

Pauline Rohlke  
Email: rohlkep@umichlaw.com  
ATTORNEY FOR DEFENDANT  
THE ROHLKE LAW FIRM, LLC

By: /s/ Axel Sykaluk  
Axel Sykaluk (0021968)  
ATTORNEY FOR PLAINTIFF