

other important information that goes directly to the governmental units decision and policy making. It is essential for the efficient and effective workings of a governmental unit that such information be privileged from discovery so that the governmental unit may freely communicate within itself in order to develop policy and make decisions.

Defendants have also sought to discover the Plaintiffs trial preparation materials which are privileged from discovery. See Ohio Civil Rule 26(B)(3); Hickman v. Taylor, 329 U.S. 495 (1947). This privilege protects the discovery of materials prepared in anticipation by the Plaintiff's attorney or by the Plaintiff's investigator, who is an agent for the attorney.

Feb 4 '83

Date

/S/

EVAN J. REED
JUDGE, COMMON PLEAS COURT

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