IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

VELENCIA MAIDEN, as Personal Representative of the Estate of CLIFTON DARNELL ARMSTRONG, deceased,)))
Plaintiff,) Case No. CIV-14-413-F)
V.)))
THE CITY OF OKLAHOMA CITY, et al., Defendants.)))

PLAINTIFF'S RESPONSE TO DEFENDANT CITY'S REQUESTS FOR ADMISSIONS TO PLAINTIFF

TO: Richard C. Smith, Esq.
Jennifer Warren, Esq.
200 North Walker, Suite 400
Oklahoma City, Oklahoma 73102

REQUESTS FOR ADMISSIONS

REQUEST NO. 1: Please admit that the actions of Plaintiff's decedent were the sole and proximate cause of his injuries and subsequent death.

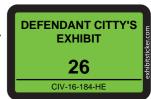
RESPONSE NO. 1: Denied.

REQUEST NO. 2: Please admit that on May 1, 2013, Plaintiff's decedent was hearing voices and behaving in a paranoid manner.

RESPONSE NO. 2: Denied.

REQUEST NO. 3: Please admit that on May 1, 2013, police responded to

Plaintiff's decedent's location after receiving a 911 call regarding his behavior.



RESPONSE NO. 3: Admitted.

REQUEST NO. 4: Please admit that Plaintiff told the police officers that Clifton Armstrong was "delusional."

RESPONSE NO. 4: Denied.

REQUEST NO. 5: Please admit that on May 1, 2013, Plaintiff tried to convince Plaintiff's decedent to seek medical attention but he refused.

RESPONSE NO. 5: Denied.

REQUEST NO. 6: Please admit that on May 1, 2013, OCPD officers tried to convince Plaintiff's decedent to seek medical attention but he refused.

RESPONSE NO. 6: Denied.

REQUEST NO. 7: Please admit that on May 1, 2013, Plaintiff's decedent stripped naked while standing in the front yard/street of Plaintiff's house.

RESPONSE NO. 7: Admitted.

REQUEST NO. 8: Please admit that Plaintiff's decedent charged at one of the OCPD officers.

RESPONSE NO. 8: Denied

REQUEST NO. 9: Please admit that while the OCPD officers were attempting to place handcuffs on Plaintiff's decedent, Plaintiff's decedent refused to comply with the officers' instructions to calm down.

RESPONSE NO. 9: Denied.

REQUEST NO. 10: Please admit that while the OCPD officers were attempting to place handcuffs on Plaintiff's decedent, Plaintiff's decedent fought and struggled with the officers.

RESPONSE NO. 10: Denied.

REQUEST NO. 11: Please admit that while the OCPD officers were attempting to place handcuffs on Plaintiff's decedent, Plaintiff tried to assist by holding Plaintiff's decedent's leg down.

RESPONSE NO. 11: Admitted as worded.

REQUEST NO. 12: Please admit that Plaintiff did not see any OCPD officer hit, punch or kick Plaintiff's decedent.

RESPONSE NO. 12: Denied.

REQUEST NO. 13: Please admit that after Plaintiff's decedent was handcuffed he continued to kick and buck his body.

RESPONSE NO. 13: Denied.

REQUEST NO. 14: Please admit that after Plaintiff's decedent was handcuffed and placed in maximum restrains he was yelling.

RESPONSE NO. 14: Denied.

REQUEST NO. 15: Please admit that OCPD officers summoned EMSA to the scene.

RESPONSE NO. 15: Denied.

REQUEST NO. 16: Please admit that OCPD officers attempted to perform CPR on Plaintiff's decedent.

RESPONSE NO. 16: Denied.

REQUEST NO. 17: Please admit that Plaintiff told Det. Robbie Benavides that she did not see the OCPD officers do anything wrong during the incident.

RESPONSE NO. 17: Denied.

REQUEST NO. 18: Please admit that the States Medical Examiner's office opined that Plaintiff's decedent died of acute methamphetamine toxicity.

RESPONSE NO. 18: Denied.

REQUEST NO. 19: Please admit that Plaintiff signed a third party affidavit on May 2, 2013, stating in part, that immediate emergency action was necessary due to her decedent's "very paranoid hallucinated (sic) state of mind."

RESPONSE NO. 19: Denied as worded.

REQUEST NO. 20: Please admit that Ms. Jean Griffin signed a third party affidavit on May 1, 2013, stating that immediate emergency action was necessary due to "Clifton's paranoid-hallucinate."

RESPONSE NO. 20: Denied as worded.

Respectfully submitted,

/s/ E. Ed Bonzie

E. Ed Bonzie, #15190 Attorney for the Plaintiff 8201 S. Walker Oklahoma City, OK 73139 405-631-1021 405-616-1488 ed@edbonzielaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of July, 2014, I mailed the attached Defendant City's Interrogatories, Requests for Production of Documents and Request for Admissions to:

Richard C. Smith 200 North Walker, Suite 400 Oklahoma City, Oklahoma 73102

E. Ed Bonzie
Attorney for the Plaintiff