

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

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**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