

Tabitha Barnes

October 30, 2018

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

TABATHA BARNES, TERRI MORRIS, )  
SYRITA BOWEN, CARLA JOHNSON, )  
KALA LYLES, JANNIE LIGONS, )  
SHANDAYREON HILL, )

Plaintiffs, )

VS. )

Case No. CIV-16-184-HE

THE CITY OF OKLAHOMA, a )  
municipal corporation, )  
DANIEL HOLTZCLAW, BILL CITTY, )  
BRIAN BENNETT, ROCKY GREGORY, )  
JOHN AND JANE DOES, all in )  
their individual capacity, )

Defendants. )

**COPY**

VIDEOTAPED DEPOSITION OF TABITHA JEAN BARNES  
TAKEN ON BEHALF OF THE DEFENDANT  
IN OKLAHOMA CITY, OKLAHOMA  
ON OCTOBER 30, 2018

REPORTED BY: SUSAN J. FENIMORE, CSR, RPR



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1 A No.

2 Q Okay. Paragraph 85, Page 30, Defendant's  
3 Exhibit Number 12. I'm sorry. "Fourth and  
4 Fourteenth Amendment Municipal Liability -  
5 Ratification as to all Defendants."

6 How did Detective Gregory ratify  
7 Holtzclaw's actions?

8 MR. GILBERT: Object to the form.

9 THE WITNESS: I don't know.

10 Q (By Mr. Smith) How did Defendant Citty  
11 ratify his actions?

12 A I don't know.

13 Q Did you ask your lawyers those questions  
14 when you -- someone read this to you?

15 A No.

16 Q Okay. Paragraph 91, Page 31 on Defendant's  
17 Exhibit 12. "Seventh Cause of Action Fourth and  
18 Fourteenth Amendments Municipal Liability - Failure  
19 to Train as to All Defendants."

20 Do you see that, ma'am? It's on Page 31.  
21 Do you see it?

22 A Uh-huh.

23 Q I'm sorry. Yes?

24 A Yes.

25 Q Okay. Do you think Detective Gregory is a