

R I G G S  A B N E Y

NEAL TURPEN ORBISON LEWIS
ATTORNEYS AND COUNSELORS AT LAW

September 21, 2018

Richard C. Smith
Municipal Counselor's Office- OKC
200 N. Walker Ave., Suite 400
Oklahoma City, OK 73102

Sent via email: rick.smith@okc.gov

Re: *Ligons, et al., v. Holtzclaw, et al.*; U.S. District Court, Western District of Oklahoma; Case No. CIV-2016-184-HE

Dear Rick,

Thank you for meeting with us after Lieutenant Bennett's deposition and conferring with us about the items we identified as missing from the City of Oklahoma City's document production. After our discussion, we still believe the documents we have requested are not new discovery requests, but that such documents fall within the parameters of our previously submitted requests for production (specifically, paragraphs 7, 11, 12, 14(a), and 14(d)). Thus, it is our position that such items, outlined below, should already have been produced:

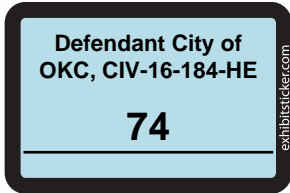
1. As we discussed, we requesting and are entitled to **all** documents relating to, concerning, discussing, prompting, and/or causing to be drafted the September 21, 2015 "supplemental" report Lieutenant Bennett generated in which he revealed on record for the first time that Ms. Campbell did not mention that her complaint against Officer Holtzclaw was not sexual in nature. This would include **all** documents comprising or memorializing your communication(s) with Chief City relating to the investigation of Ms. Campbell's complaint and/or the need to make a record of a lack of a sexual element to said complaint.¹ This would also include Major Jennings' email to Lieutenant Bennett, as well as any other documents comprising or memorializing communication(s) to and/or from any employee of the City of Oklahoma City in which at least one of the subjects discussed and/or referenced in such communication(s) is Ms. Campbell's complaint about Officer Holtzclaw.
2. The documents relating to Clifton Armstrong, as requested in paragraphs 36 and 37 of the Plaintiffs' Requests for Production of Documents.

Please submit these documents by end-of-business on Tuesday, September 25, 2018. Otherwise, we will be forced to move forward with our motion to compel.

Sincerely,



Melvin C. Hall
FOR THE FIRM



¹ We only know about this communication because of your voluntarily admission during our discussion that it was you, Richard Smith, who first raised the need to supplement Lt. Bennett's November 5, 2013 report with Chief City.