

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

JANNIE LIGONS, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. CIV-16-184-HE
)	
CITY OF OKLAHOMA CITY,)	
a municipal corporation, et al.,)	
)	
Defendants.)	

**PLAINTIFF KALA LYLES’ RESPONSES TO DEFENDANT OKLAHOMA CITY,
CITY, AND GREGORY’S SECOND SET OF INTERROGATORIES**

Plaintiff Kala Lyles (“Plaintiff” or “Ms. Lyles”), through her attorneys of record Benjamin L. Crump, Melvin C. Hall, and Damario Solomon-Simmons herein submits her responses to Defendants Oklahoma City, (“City”), Bill City (“City”), and Rocky Gregory’s (“Gregory”) Second Set of Interrogatories, and submits her objections, as follows:

GENERAL OBJECTIONS AND LIMITATIONS TO RESPONSES

The following objections and conditions qualify each and every response of Plaintiff to Defendant's interrogatories (discovery requests), and are incorporated by this reference into each and every response of Plaintiff to Defendant's discovery requests, as if fully set forth therein:

1. Plaintiff objects to the definitions and instructions contained in Defendant's discovery requests to the extent that they attempt to impose obligations or requirements upon Plaintiff beyond those posed by the applicable statutes and rules of procedure.

Plaintiff will respond to Defendant's discovery requests in accordance with the applicable statute and rules of procedure.

2. Each of the following responses are made subject to and without waiving any objections. Plaintiff may have with respect to the subsequent use of these responses or the documents identified pursuant thereto, and Plaintiff specifically reserves: (a) all questions as to the privilege, relevancy, materiality, and admissibility of said responses or documents; (b) the right to object to the uses of said responses or the documents identified pursuant thereto in any lawsuit or proceeding on any or all of the foregoing grounds or on any other proper ground; (c) the right to object on any and all proper grounds, at any time, to other discovery procedures involving or related to said responses or documents; and (d) the right, at any time, upon proper showing, to revise, correct or clarify any of the following Responses.

3. Plaintiff objects to each of Defendant's discovery requests to the extent they call for the disclosure of information which is protected from discovery and privileged for the reason that: (a) is subject to the attorney/client privilege; (b) is covered by the "work product" doctrine; (c) was generated for and in anticipation of litigation or for trial by or for Plaintiff or its representatives, including its attorneys, consultants or agents; and (d) is otherwise privileged or beyond the scope of discovery under the applicable rules and laws.

4. Plaintiff objects to each and every discovery request to the extent it seeks information or the identification of documents concerning any claims or occurrences

other than the claims and occurrences set forth in Plaintiff's Complaint for which Plaintiff requests relief.

5. Where the response to an interrogatory propounded by Defendant may be derived or ascertained from the documents which will be produced by Plaintiff and the burden of deriving or ascertaining the response is substantially the same as for Plaintiff, Plaintiff reserves the right to refer Defendant to such documents and records.

6. By responding to the discovery requests of the Defendant, Plaintiff concedes neither the relevancy nor the admissibility of any information or document in response to a specific discovery request and such response does not constitute an admission that such information is probative of any particular issue in this case.

7. Plaintiff reserves the right, as additional information is discovered, analyzed or made available during discovery and during the course of these proceedings, to supplement or revise these Responses to Defendant's discovery requests.

8. Plaintiff objects to the extent the Defendant's discovery requests seek information and documents generated or formulated by persons or entities independent of Plaintiff over whom Plaintiff has no control.

The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, Plaintiff expressly does not waive the application of the remainder of the General Objections and Limitations to Responses to such response. Subject to these objections and subject to any additional objections set forth, hereinafter, Plaintiff responds to Defendant's discovery requests as follows

RESPONSE TO INTERROGATORIES

INTERROGATORY NO. 10: Please state what evidence Plaintiff has which tends to prove that Defendants City, City or Gregory ignored the complaint of Terri Morris.

Response to Interrogatory No. 10: Plaintiff Lyles objects to this interrogatory to the extent that “ignored” is not defined. Without waiving her objection Plaintiff Lyles states that after she complained that she had been sexually assaulted by an OCPD police officer, Defendants failed to adequately and appropriately respond and investigate her complaint. This resulted in Holtzclaw sexually assaulting more victims.

INTERROGATORY NO. 11: Please state what evidence Plaintiff has which tends to prove that Defendants City, City or Gregory would have ignored the complaint of Ms. Ligons, except for the fact she was related to an Oklahoma City police officer.

Response to Interrogatory No. 11: Plaintiff Lyles objects to this interrogatory to the extent that “ignored” is not defined. Without waiving her objection Plaintiff Lyles states that had Defendants adequately and appropriately investigated the numerous instances of sexual assault committed by Holtzclaw, the sexual assault perpetrated against Ms. Ligons, whose second cousin is an Oklahoma City police officer- Anthony Carter, she would not have been a victim of Holtzclaw on June 18, 2014.

INTERROGATORY NO. 12: Please state what evidence Plaintiff has which tends to prove that Defendant City does not investigate complaints of sexual misconduct of police officers.

Response to Interrogatory No. 12: Plaintiff Lyles objects to this interrogatory to the extent that it implies that Plaintiff contends that Defendant City does not investigate complaints of sexual misconduct of police officers. Without waiving her objection, the evidence is clear the Defendant City does not, and has not, adequately and appropriately investigated complaints of sexual misconduct by its police officers because, had it done so, Holtzclaw would not have been able to sexually assault numerous African American female citizens over an eight-month period of time.

INTERROGATORY NO. 13: Please state what evidence Plaintiff has which tends to prove that Defendant City did not properly screen or test applicants seeking employment as a police officer.

Response to Interrogatory No. 13: Plaintiff Lyles objects to this interrogatory to the extent that it seeks information regarding whether Defendant City did not properly screen or test applicants seeking employment as a police officer. This is not a claim or cause of action made by Plaintiff in her First Amended Complaint. Consequently, this is not an interrogatory question that Plaintiff is required to answer.

INTERROGATORY NO. 14: Please state what evidence Plaintiff has which tends to prove Defendant City failed to train police officers not to abuse their police power.

Response to Interrogatory No. 14: Discovery is ongoing, but based upon information and belief, the training policies of the OCPD were non-existent and/or inadequate to train its police officers to handle the usual and recurring situations with which they must

effectively navigate. Specifically, training was totally inadequate, without limitation, with respect to:

- a. receiving complaints of sexual assault by fellow OCPD officers;
- b. investigating complaints of sexual assaults by fellow OCPD officers;
- c. disciplining OCPD officers for sexual assaults upon Oklahoma City residents;
- d. prosecuting OCPD police officers for sexual assaults upon Oklahoma City residents.

INTERROGATORY NO. 15: Please state what evidence Plaintiff has which tends to prove that Defendants City, Citty or Gregory conspired to cover up Ms. Campbell's complaint.

Response to Interrogatory No. 15: Based upon information and belief, neither Defendant Citty, Gregory, Bennett, nor Holtzclaw are African American, similar to Ms. Campbell. Ms. Campbell's complaint against Holtzclaw was not investigated to the same extent the other African American victims were investigated. In fact, Defendant Bennett concluded that Holtzclaw's actions regarding Ms. Campbell were within departmental guidelines. Consequently, Ms. Campbell's complaint was covered up, not adequately investigated, nor presented to the DA for prosecution. Defendants City, Citty, Gregory, and Bennett either knew, or should have known, about Campbell's complaint against Holtzclaw, however, they conspired to cover up that case and not present it for prosecution.

INTERROGATORY NO. 16: Please state what evidence Plaintiff has which tends to prove that Ms. Campbell's complaint to the OCPD on November 5, 2013, was that an OCPD officer sexually assaulted her.

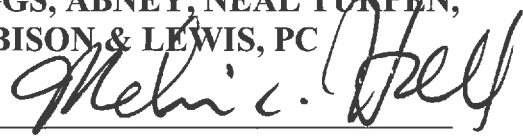
Response to Interrogatory No. 16: Plaintiff Lyles objects to this interrogatory to the extent that it seems to narrow Ms. Campbell's complaint to the OCPD on November 5, 2013, to that of an OCPD officer sexually assaulted her. Without waiving her objection, based on information and belief, Ms. Campbell, on or about November 5, 2013, notified and complained to Defendant Bennett that Holtzclaw illegally detained, arrested, used unlawful force, and sexually assaulted her without provocation, probable cause, or justification. Defendants' narrowing of Ms. Campbell's complaint against Holtzclaw to only sexual assault implies that the numerous other deprivations of Ms. Campbell's constitutional rights didn't matter, and in fact were excused by Defendant Bennett.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on January 31, 2017, the above document was via email and

U.S. Mail, postage prepaid, to the following:

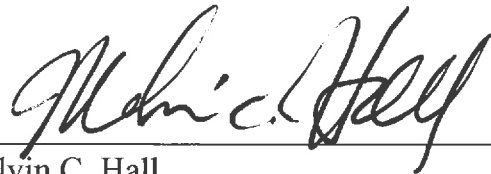
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VERIFICATION


STATE OF OKLAHOMA)
) ss.
COUNTY OF OKLAHOMA)

I, Kala Lyles, being of lawful age being first duly sworn upon oath, state that I have read my responses to Defendant Oklahoma City, Citty, and Gregory’s second set of interrogatories, and know the contents therein and the matters and things therein stated are true and correct to the best of my knowledge and belief.


Kala Lyles

Subscribed and sworn to before me on January 26, 2017.




Notary Public