

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

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

6 Plaintiffs,)

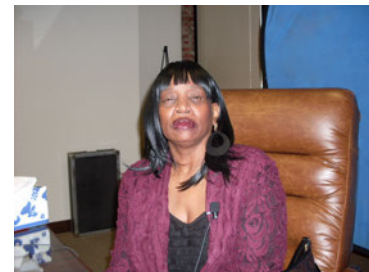
7 vs.) No.
) CIV-16-184-HE

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

11 Defendants.)

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14 VIDEOTAPED DEPOSITION OF JANNIE LIGONS
15 TAKEN ON BEHALF OF THE DEFENDANTS
16 IN OKLAHOMA CITY, OKLAHOMA
17 ON DECEMBER 14, 2018

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19 REPORTED BY: KAREN B. JOHNSON, CSR

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1 identification and made part of the
2 record)

3 Q (By Mr. Smith) Well, let me hand you
4 what's going to be marked as Defendant's Exhibit 4.
5 I'm sorry, I'm losing numbers and stickers. Why
6 don't I just give you a bunch and you can pass them
7 through.

8 A Okay.

9 Q Have you read it now, ma'am?

10 A Not all of it.

11 Q Well, what I'm really interested in is the
12 first three paragraphs and the first line of the
13 fourth paragraph, but you can read it all if you'd
14 like.

15 (Witness reviews document)

16 THE WITNESS: Okay.

17 Q (By Mr. Smith) Do you see that he
18 reported that he told his mom to have you call 911
19 and have an officer meet you at the Springlake
20 station?

21 A I see that.

22 Q You didn't do that, did you?

23 MR. SOLOMON-SIMMONS: Object to form.

24 THE WITNESS: I don't remember, I don't
25 remember.

1 Q Let me -- huh? So -- so you did tell
2 Mr. Eldridge that?

3 A I don't -- I don't remember.

4 Q Okay. Okay.

5 A Wasn't asking stuff like that.

6 Q You have a relative by the name of Anthony
7 Carter?

8 A Correct.

9 Q And he's a police officer?

10 A Correct.

11 Q Do you respect him?

12 A Yes.

13 Q All right. Is it true that when he was
14 contacted by your family members, his advice to you
15 was to call 911 that evening?

16 A I don't remember that.

17 Q You don't remember if Mr. Carter told you
18 after the event, when your daughter was seeking
19 advice, to call 911?

20 MR. SOLOMON-SIMMONS: Object to form.

21 THE WITNESS: I don't remember, no, I
22 don't remember that, I don't.

23 Q (By Mr. Johnson) Okay. And in any event,
24 you did not call 911 after this occurred; correct?

25 A Correct.

1 Q Okay. And can I ask you why that was?

2 A Because I went to the police station.

3 Q Okay. And then --

4 A I didn't have to call 911.

5 Q What's that? I'm just asking if there was
6 a reason, I'm not saying whether you should have or
7 shouldn't have, I'm just asking about if there was a
8 reason why you didn't call 911?

9 A Because I went to the police station, I
10 didn't have to call 911, I saw police on the street,
11 so I stopped.

12 Q Okay. Had you ever seen those police
13 officers before?

14 A Not to my knowledge.

15 Q Okay. Have you ever accused anyone of
16 sexually abusing you before this case?

17 A No.

18 Q Have you ever been sexually abused?

19 A No.

20 Q Okay. Have -- you were asked and denied
21 that you had ever been convicted of a felony
22 earlier, have you ever been convicted of a
23 misdemeanor?

24 A Yes.

25 Q Okay. Please summarize what misdemeanors