

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

JANNIE LIGONS, et al.,)
)
 Plaintiffs,)
)
v.)
)
CITY OF OKLAHOMA CITY,)
a municipal corporation, et al.,)
)
 Defendants.)

Case No. CIV-16-184-HE

**PLAINTIFF KALA LYLES' RESPONSE TO DEFENDANT CITY OF
OKLAHOMA CITY'S REQUEST FOR PRODUCTION OF DOCUMENTS**

REQUEST FOR PRODUCTION NO. 1: The Book of Holtzclaw referenced to at pages 41 and 65 of her deposition.

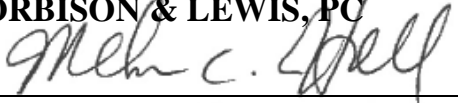
RESPONSE: None. See page 65 of Ms. Lyles' deposition lines 19 & 20, attached.

Respectfully submitted,

PARKS & CRUMP, LLC

Benjamin L. Crump, FL Bar No. 72583
240 North Magnolia Drive Tallahassee,
Florida 32301
(850) 222-3333— Office
(850) 224-6679 — Fax
bcrump@parkscrump.com

**RIGGS, ABNEY, NEAL TURPEN,
ORBISON & LEWIS, PC**



Melvin C. Hall, OBA #3728
528 NW 12th Street Oklahoma City, OK
73103
(405) 843-9909—Office
(405) 842-2913—Fax
mhall@riggsabney.com
-and-

Damario Solomon-Simmons, OBA #20340
Kymberli JM Heckenkemper, OBA #33524
502 West 6th Street
Tulsa, Oklahoma 74119
(918) 587-3161—Office
(918) 587-9708—Fax
dsimmons@riggsabney.com
kheckenkemper@riggsabney.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that on February 11, 2019, the above document was via email, to the following: Richard C. Smith, rick.smith@okc.gov; Sherri R. Katz, sherri.katz@okc.gov; Thomas L. Tucker, thomasltucker@okc.gov; Chris Collins, cjc@czwlaw.com; Ambre C. Gooch, acg@czwlaw.com; Elizabeth K. Stepp, eks@federallawyer.com; Kathleen T. Zellner, Douglas H. Johnson, Nicholas M. Curran, attorneys@zellnerlawoffices.com; Cody Gilbert, gilbertlawok@gmail.com.


Melvin C. Hall

Kala Lyles

December 13, 2018

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1 MR. SMITH: Can we switch places?

2 MS. GOOCH: Oh, yeah.

3 MR. SMITH: I was having a hard time
4 hearing the witness.

5 MS. GOOCH: Yeah.

6 MR. SMITH: Only because I'm deaf.

7 CROSS-EXAMINATION

8 BY MR. SMITH:

9 Q Ms. Lyles, my name is Richard Smith,
10 Ms. Katz and I represent the City of Oklahoma City,
11 Chief Citty and a detective by the name of Rocky
12 Gregory, okay? I'm going to ask you a few more
13 questions and hopefully I won't be redundant,
14 hopefully I won't be as long.

15 When you were testifying when Ms. Gooch
16 was asking you questions, you said there was the
17 book of Holtzclaw, what do you mean by the "book of
18 Holtzclaw"?

19 A The book of Holtzclaw, I can't recall, I
20 don't understand.

21 Q Did you not say that there was -- you saw
22 a book of Holtzclaw?

23 A No, I did not say that.

24 Q Okay. Have you read the media's report of
25 this case?