

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

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4 TABATHA BARNES, et al., )  
 )  
5 Plaintiffs, )  
 ) No.  
6 vs. ) 16-CV-0184-HE  
 )  
7 CITY OF OKLAHOMA CITY, et al., )

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VIDEOTAPED DEPOSITION OF BILL CITY

12

TAKEN ON BEHALF OF THE PLAINTIFFS

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IN OKLAHOMA CITY, OKLAHOMA

14

ON FEBRUARY 19, 2020

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REPORTED BY: KAREN B. JOHNSON, CSR

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1 weren't, but --

2 Q (By Mr. Smith) And we spent a half an hour  
3 on a use of force on a Ms. Washington that was  
4 produced to counsel because it involved Daniel  
5 Holtzclaw, and he was asking you about alleged slap  
6 by a different police officer; correct?

7 A Yes.

8 Q It was Sergeant Roof, not Holtzclaw;  
9 right?

10 A Correct.

11 Q Wouldn't have helped the investigators one  
12 bit, would it?

13 A No.

14 Q If you looked at somebody's AVL data, and  
15 I got a little confused on your answer, would it  
16 tell you that they're raping a woman, the AVL data  
17 by itself?

18 A No. The AVL just tells you the location  
19 of the officer at any specific time.

20 Q If an officer calls in a female's name in  
21 VARUNA or any of your other systems, does it tell  
22 you what they're doing with that woman?

23 A No.

24 MR. SMITH: Pass the witness.

25 MR. SOLOMON-SIMMONS: You have a great