

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

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

Plaintiffs, )

VS. )

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

Defendants. )

Case No. CIV-16-184-HE

**COPY**

VIDEOTAPED DEPOSITION OF TABITHA JEAN BARNES  
TAKEN ON BEHALF OF THE DEFENDANT  
IN OKLAHOMA CITY, OKLAHOMA  
ON OCTOBER 30, 2018

REPORTED BY: SUSAN J. FENIMORE, CSR, RPR



**METROPOLITAN BUILDING**  
400 North Walker, Suite 160  
Oklahoma City, OK 73102  
405-235-4106

**MID-CONTINENT TOWER**  
401 South Boston, Suite 310  
Tulsa, OK 74103  
918-599-0507

depo@drreporting.com

**REPORTING & VIDEO, INC.**

1 reviewed any documents that you think have anything  
2 to do with your lawsuit?

3 A No.

4 Q Have you reviewed any audio recordings that  
5 you think have anything to do with your lawsuit?

6 A No.

7 Q Have you reviewed any video recordings that  
8 you think have anything to do with your lawsuit?

9 A No.

10 Q Have you reviewed any photographs that you  
11 think have anything to do with your lawsuit?

12 A No.

13 Q What do you think your lawsuit's about?

14 A What happened to me with Daniel Holtzclaw.

15 Q Okay. Who do you understand you have sued?

16 A Well, I understand that I -- that I'm  
17 suing?

18 Q Yes.

19 A I can't just go to every single person.

20 Q Okay.

21 A But I understand the City of Oklahoma  
22 (sic).

23 Q Okay.

24 A Daniel Holtzclaw. I don't know every --  
25 you know, because it's so many to keep up, City of