

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

3

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

8 Plaintiffs,

9 vs.

) No.
) CIV-16-184-HE

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

15 Defendants.)



16

17 VIDEOTAPED DEPOSITION OF KALA LYLES
18 TAKEN ON BEHALF OF THE DEFENDANTS
19 IN OKLAHOMA CITY, OKLAHOMA
20 ON DECEMBER 13, 2018

21

22 REPORTED BY: KAREN B. JOHNSON, CSR

23

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1 Q There's some water and snacks behind us.

2 Do you need anything?

3 A No.

4 Q Okay. Are you on any medication
5 presently?

6 A No.

7 Q Are you supposed to be taking some
8 medication that you're just not taking?

9 A No.

10 Q Do you have any military service?

11 A No.

12 Q What is your date of birth?

13 A November the 14th, 1984.

14 Q So how old are you today?

15 A Thirty-four.

16 Q Did you do anything to prepare for your
17 deposition today?

18 A Other than come.

19 Q Okay. Your conversations with your
20 attorneys in this case are privileged. I'm not
21 going to ask you what you discussed with your
22 lawyers and I don't want you to tell me what you
23 discussed with your lawyers.

24 A Okay.

25 Q But I do have some questions that may lead

1 was, I just read it.

2 Q Okay. What do you recall reading?

3 A All the -- the same thing you talking
4 about, the book of Holtzclaw.

5 Q Okay. The book of Holtzclaw?

6 A Yeah, all of this right here.

7 Q Okay.

8 A Yeah.

9 Q Did you read testimony that you gave in
10 court?

11 A If I did, it was long ago, then I done
12 read a book since then.

13 Q Okay. I'm confused. When you say you've
14 read a book since then --

15 A I read plenty of books since then.

16 Q Books that don't relate to Holtzclaw?

17 A Right.

18 Q Okay. So the -- the -- I'm sorry?

19 A What?

20 Q Did you say something?

21 A No. I'm listening to you.

22 Q Okay. So I want to understand what it is
23 that you read, do you remember what it looked like?

24 A Words.

25 MR. HALL: Object as to form.

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?

1 Q (By Mr. Smith) Again, listed as defendant
2 is Chief Citty, was he present on June 17th when
3 Holtzclaw raped you?

4 A No.

5 Q Okay. Did he use any -- has he ever used
6 any force on you; Chief Citty?

7 A No.

8 Q Okay. Next page, conspiracy, conspiracy
9 to interfere with 4th and 14th Amendment rights, do
10 you see that, ma'am, it's on Page 26 starting on
11 Paragraph 66?

12 MR. SMITH: I think I got that one right,
13 Melvin.

14 MR. HALL: There it is right there.

15 THE WITNESS: Now, what was the question
16 you asking me?

17 Q (By Mr. Smith) What evidence do you have
18 personally, you, nobody else, you, that Chief Citty
19 entered a conspiracy with anybody to cover up for
20 Holtzclaw or whatever?

21 A Nothing that I know of.

22 Q Okay. What evidence do you have that --
23 you see on Paragraph 68, you've listed Detective
24 Gregory as one of the conspirators, what evidence do
25 you have that Rocky Gregory entered into any

1 conspiracy with anybody to cover up for Holtzclaw?

2 A No -- nothing that I know of, I don't even
3 know who these people is.

4 Q I heard "nothing that you know of," but I
5 didn't understand the rest of it.

6 A I don't even know who that is.

7 Q Okay. Thank you. Paragraph -- or fifth
8 cause of action, ma'am, I've got Page 28 on my
9 notes, failure to supervise. And I assume this is
10 why you think Chief Citty should be liable because
11 he didn't supervise Holtzclaw, at least according to
12 this document; correct?

13 A Yes.

14 Q Let's talk about Rocky Gregory, you said
15 you don't even know who he is, do you know he's a
16 detective?

17 A Okay.

18 Q What supervision does a detective have
19 over a patrol officer?

20 A I have no idea, but they got --

21 Q Thank you.

22 A -- nothing to do with that.

23 Q Sixth cause of action, starting on Page
24 30, ratification. Is it already on Page --

25 MR. HALL: Yeah, it's there.