

PLAINTIFF TERRI MORRIS' INTERROGATORY NO. 9: Please identify the name, rank, and title of the on-call sex crimes detective(s) whom Lt. Michelle Holland notified of Terri Morris' allegation of sexual assault by an OCPD officer on May 24, 2014.

RESPONSE: Lt. Holland did not notify any on-call sex crimes detective on May 24, 2014 (which is the day that Ms. Morris did advise members of the OCPD of the sexual assaults, however, she gave a faulty address and could not give a date of the assault, contrary to Plaintiffs' Complaint and/or Amended Complaint filed in this case). See Lt. Holland's testimony at the criminal trial of Holtzclaw and report, both of which have already been provided to Plaintiffs' counsel.

Respectfully Submitted,

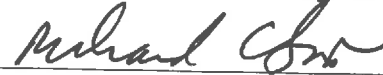
Kenneth Jordan
Municipal Counselor



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Attorneys for Defendants City of
Oklahoma City, City and Gregory

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of November, 2018, a true and correct copy of Defendant City's Responses to Plaintiff Terri Morris' First Set of Interrogatories to Defendant City of Oklahoma City was sent by prepaid, certified U.S. Mail to: Melvin C. Hall, 528 N.W. 12th Street, Oklahoma City, OK 73103, Cody Gilbert, 2207 N. Broadway, Oklahoma City, OK 73103, Attorneys for Plaintiffs; Chris Collins and Ambre C. Gooch, 429 NE 50th Street, Second Floor, Oklahoma City, OK 73105, Attorneys for Defendant Bennett; and Kathleen T. Zellner, 1901 Butterfield Road, Suite 650, Downers Grove, IL 60515, Attorney for Defendant Daniel Holtzclaw.

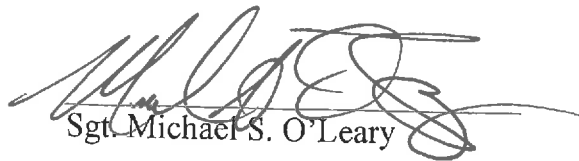


Assistant Municipal Counselor

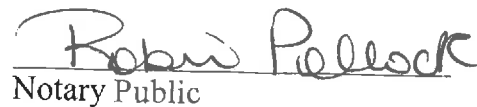
VERIFICATION

STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA) SS:

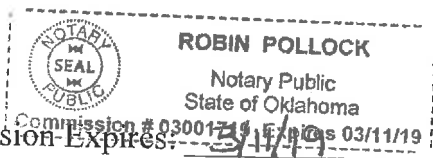
I, Sergeant Michael S. O'Leary, of lawful age, being first duly sworn, hereby certify that I have read Defendant City's Responses to Interrogatory Nos. 2 (last sentence) and No. 6 to Plaintiff Terri Morris' First Set of Interrogatories to Defendant City of Oklahoma City and know the contents therein and the matters and statements contained therein are true and correct to the best of my knowledge and belief.


Sgt. Michael S. O'Leary

Subscribed and sworn to before me this 13th day of November, 2018.


Notary Public

(SEAL)



My Commission Expires: 3/11/19

My Commission No.: 03001719