

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

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

Plaintiffs,)

-vs-)

No. CIV-16-184-HE

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

Defendants.)

VIDEOTAPED DEPOSITION OF KIM DAVIS

TAKEN ON BEHALF OF THE DEFENDANTS

IN OKLAHOMA CITY, OKLAHOMA

ON JANUARY 29, 2019

REPORTED BY: KASEY D. EGELSTON, CSR

1 of hair or wrong color of eyes or get the weight
2 wrong or get their height -- a lot of times these
3 people look like giants when this is happening to
4 them and then when you get them, they're not very
5 big at all. No.

6 Q But Ellis said she was raped by a black man
7 and Holtzclaw is white?

8 MR. SOLOMON-SIMMONS: Object to form.

9 Q (By Mr. Johnson) Isn't that a bigger
10 discrepancy than the eye color?

11 A Well, it is a discrepancy, but it's dark
12 outside. He's medium color. I mean, he's not like
13 -- because he's part Asian too. He's medium color.
14 I mean, did it raise my eyebrows when she said he
15 was black, yeah. But then after the investigation
16 and I went through and matched everything else up
17 that she said, it did not concern me.

18 Q But let's take Ellis. Do you recall that
19 she said she was raped in a schoolyard, but his AVL
20 -- Holtzclaw's AVL showed that he didn't stop at the
21 schoolyard. Do you recall that?

22 A I know she said she was raped at a
23 schoolyard and his AVL showed him around the
24 schoolyard, but it can't show him in the schoolyard
25 because it only shows city streets.