

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

TABATHA BARNES, et al.,	)	
	)	
Plaintiffs,	)	
	)	
-v-	)	Case No: CIV-16-184-HE
	)	
CITY OF OKLAHOMA CITY,	)	
a municipal corporation, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT HOLTZCLAW AMENDED NOTICE TO  
TAKE VIDEO - DEPOSITION ELAINE TAYLOR**

You are hereby notified that the Defendant Daniel Holtzclaw in the above-styled case will take the video-deposition of Elaine Taylor on October 29<sup>th</sup>, 2018 at 9:00 a.m. at D & R Reporting & Video, Inc., 400 North Walker, Suite #160, Oklahoma City, OK 73102. The deposition will be taken upon oral examination before a qualified court reporter and will continue from day to day until completed. Deposition rider attached.

Respectfully submitted,

/s/ Kathleen T. Zellner  
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ATTORNEY FOR DEFENDANT  
DANIEL HOLTZCLAW

**CERTIFICATE OF SERVICE**

I hereby certify that on October 8<sup>th</sup>, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants.

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/s/ Kathleen T. Zellner

## RIDER TO AMENDED DEPOSITION SUBPOENA TO ELAINE TAYLOR

*Tabatha Barnes, et al. v. City of Oklahoma City, et al., Case No. 16-184-HE*

### REQUESTS

1. Please produce any and all documents from 6/18/2011 to present related to the investigation, arrest and prosecution of Daniel K. Holtzclaw, including but not limited to any forensic testing related in any way to *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869. This request includes, but is not limited to:
  - a. A copy of any case file kept by you related to *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869.
  - b. A copy of any and all documents, emails, memoranda, logs, notes and writings kept by you related to *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869.
  - c. A copy of the entire Oklahoma City Police Crime Lab file related to *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869.
  - d. Your personnel file reflecting your employment with the Oklahoma City Police Crime Lab.
  - e. Your administrative file reflecting your employment with the Oklahoma City Police Crime Lab.
  - f. Your official case file related to *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869.
  - g. All Oklahoma City Police Crime Lab reports, memoranda, notes, phone logs, contamination logs and records.
  - h. Contamination logs of the Oklahoma City Police Crime Lab that refer to Elaine Taylor and/or the work of Elaine Taylor.
  - i. Incident reports of the Oklahoma City Police Crime Lab that refer to Elaine Taylor and/or the work of Elaine Taylor, including but not limited to mistakes such as sample mix-ups, unusual occurrences, and contamination errors.
  - j. All internal/external proficiency testing, performance results for Elaine Taylor pursuant to her employment with the Oklahoma City Police Crime Lab.
  - k. Any and all documents related to any and all cases involving the work of Elaine Taylor that have been selected for re-testing pursuant to any internal quality control or other internal audit.
  - l. Any and correspondence, including letters, emails, texts, facsimilies received by you from, or sent by you to, the Oklahoma City Police Crime Lab since your retirement related in any way to your employment with the lab and/or *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869.
  - m. Any and correspondence, including letters, emails, texts, facsimilies received by you from, or sent by you to, the Oklahoma County District Attorney's Office related in any way to *State of Oklahoma v. Daniel K. Holtzclaw*, CF-2014-5869.
  - n. Copies of any reviews and/or notes of reviews of Ms. Taylor's testimony, in this or any other case, by any of her supervisors or other analysts, including but not limited to Campbell Ruddock.