

Terri Morris

December 13, 2018

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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.)

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.)

) No.
) CIV-16-184-HE

VIDEOTAPED DEPOSITION OF TERRI MORRIS
TAKEN ON BEHALF OF THE DEFENDANTS
IN OKLAHOMA CITY, OKLAHOMA
ON DECEMBER 13, 2018

REPORTED BY: KAREN B. JOHNSON, CSR

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1 TERRI MORRIS,
2 after having been first duly sworn at 1:36 p.m.
3 deposes and says in reply to the questions
4 propounded as follows, to wit:

5 DIRECT EXAMINATION

6 BY MS. GOOCH:

7 Q Ms. Morris, my name is Ambre Gooch.

8 A Yes.

9 Q You sat through a deposition of Ms. Lyles
10 earlier this morning; is that correct?

11 A Yes, ma'am.

12 Q Were you here for the entirety from the
13 beginning to end of her deposition?

14 A Yes, ma'am.

15 Q Okay. So you've kind of seen how the
16 process goes, all right?

17 A Yes, ma'am.

18 Q If at any time, though, you have a
19 question for your attorney, you want to take a
20 break, just let us know and we're happy to do that.

21 A Okay.

22 Q If you need a break just to get up, move
23 around, get some fresh air, please tell me. I don't
24 think I'm going to take a whole lot of time, just
25 like I didn't with Ms. Lyles, but I want you to feel

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1 one I'm talking about is just going to be Number 12,
2 so you could use one, two or three, or the original
3 one, two or three, but -- but I'm introducing the
4 third amended, and I'm sorry, I've lost my numbers.
5 6.

6 MR. JOHNSON: That was 6?

7 MR. SMITH: Yes, sir. Here, no, I forgot,
8 you're --

9 MR. HALL: Thank you.

10 Q (By Mr. Smith) Would you look at Count
11 12.

12 MR. SOLOMON-SIMMONS: It's the third page.

13 THE WITNESS: Okay.

14 MR. SOLOMON-SIMMONS: The next one.

15 Q (By Mr. Smith) Do you see it's alleged
16 that on May 8th, 2014, Holtzclaw violated you,
17 ma'am?

18 A Yeah.

19 Q Do you know how the date May 8th was
20 arrived at?

21 A I wasn't -- I wasn't -- it wasn't May the
22 8th when I was violated, I was violated three or
23 four days before I reported it.

24 Q Okay. Ma'am, do you understand that the
25 reason we picked May 8th was because that's the date