

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

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

SHERRY ELLIS, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. CIV-16-019-HE
)	
DANIEL HOLTZCLAW, et al.,)	
)	
Defendants.)	

PLAINTIFFS’ NOTICE OF DEPOSITION
PURSUANT TO FED. R. CIV. P. 30(b)(6)

TO: Defendant City of Oklahoma City
c/o Richard Mann, Sherri R. Katz & Thomas L. Tucker
Assistant Municipal Counselors
200 N. Walker Ave., Ste. 400
Oklahoma City, OK 73102

PLEASE TAKE NOTICE that, pursuant to Fed. Rs. Civ. P. 30(b)(6) and 45, Plaintiffs Jannie Ligons, Shardayreon Hill, Terri Morris, Carla Johnson, and Kala Lyles in CIV-16-184-HE, and Plaintiff Regina Copeland in CIV-16-019-HE (collectively, “Plaintiffs”) will take the deposition of the designated representative(s) on Tuesday, June 1st, 2021 at 10:00 a.m. via

“Remote Counsel,” an electronic service provided by D & R Reporting & Video, Inc. Notice of the video conference will be provided to all parties by Plaintiff’s counsel. The deposition will be taken upon oral examination before a qualified court reporter, may be video recorded by equipment operated by counsel for the Plaintiffs, and will continue from day to day until completed. The designated representative(s) should have knowledge of the following subject matters:

1. Referral of citizen complaints and allegations against Oklahoma City Police Department (“OCPD”) officers to the officers’ supervisors, the Office of Professional Standards, the Office of Public Integrity, or the Investigations Bureau, for investigation;

2. Process and criteria for determining whether an administrative investigation will follow a criminal investigation in which the suspect is an OCPD officer;

3. Varuna timestamps and user identifications;

4. Protocol for holding officers accountable for misconduct when a citizen complains, but when the complaint is not referred for investigation because a “satisfactory disposition” was “immediately reached with the complaining party” by the officer’s supervisor;

5. Meaning of “satisfactory disposition,” as used in OCPD Procedure 143.0;

6. Tracking complaints and complaint patterns for complaints that are not investigated because “satisfactory dispositions” were “immediately reached”;

7. Delegation of authority to impose discipline/make decisions regarding citizen complaint investigations;

8. Documentation and investigation of complaints and allegations against OCPD officers;

9. Who, if anyone, served as acting chief of the OCPD at any point from May 24, 2014, through June 18, 2014, and the dates such person or people served as acting chief during that time period;

10. OCPD officers' rights and OCPD investigators' powers during criminal investigations and administrative investigations involving complaints or allegations against OCPD officers;

11. Facts and circumstances surrounding the decision not to call out an investigator when Terri Morris reported to OCPD that she had been raped by an officer; 12.

Objectives of personnel investigations versus criminal investigations;

13. Training for sex crimes investigators and sex crimes supervisors, both generally and specifically with regard to Defendant Rocky Gregory, Inspector Kim Davis, Lieutenant Timothy Muzny, Captain Ron Bacy, and Major Denise Wenzel, on investigations of allegations of sexual misconduct against OCPD officers.

14. Training, including field training, provided to recruits from 2009 through 2013 regarding stops of pedestrians, field interviews, investigative detentions, and proactive policing;

15. Allowing OCPD officers under investigation to resign in lieu of facing criminal charges;

16. Implementation of the OCPD Early Intervention Program generally and specifically with regard to Defendant Holtzclaw;

17. OCPD/Fraternal Order of Police Collective Bargaining Agreements for 2011 through 2015;

18. Procedures relating to investigations involving OCPD officers following victims' refusals to prosecute;

Plaintiffs request that Defendant City provide written notice at least five business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on Defendant City's behalf.

Dated this 18th day of May, 2021.

Respectfully submitted,

SOLOMON SIMMONS LAW, P.L.L.C.

s/ Kymberli J. M. Heckenkemper

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Johnson, Morris, Lyles & Copeland

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2021, I filed the above document with the Clerk of Court. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the Electronic Case Filing System.

s/ Kimberli J. M. Heckenkemper