

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

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

Plaintiffs,)

7

vs.

) No.
) CIV-16-184-HE

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9 CITY OF OKLAHOMA CITY, a municipal)
10 corporation, DANIEL HOLTZCLAW,)
11 BILL CITT, BRIAN BENNETT, ROCKY)
12 GREGORY, JOHN AND JANE DOES, all)
13 in their individual capacity,)

Defendants.)



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14 VIDEOTAPED DEPOSITION OF KALA LYLES
15 TAKEN ON BEHALF OF THE DEFENDANTS
16 IN OKLAHOMA CITY, OKLAHOMA
17 ON DECEMBER 13, 2018

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19 REPORTED BY: KAREN B. JOHNSON, CSR

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Kala Lyles

December 13, 2018

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1 you -- strike that.

2 Are you -- you know when I say -- when I
3 mean 100 percent positive, you understand what that
4 means?

5 A I believe so.

6 Q If not, I can rephrase it.

7 A I believe so.

8 Q Okay. What I'm asking is, okay, are you
9 100 percent positive that the police officer that
10 raped you on the occasion as you described is the
11 police officer that had previously written you three
12 tickets?

13 A Yes.

14 Q All right. Did you tell Ms. Davis that
15 when you did speak to her --

16 A Yes.

17 Q -- about who raped you? Okay. You said
18 that you know Carla Johnson?

19 A Yes.

20 Q Okay. And I know you said a long time,
21 but how long have you known Ms. Johnson?

22 A It's too many years to go far back on.

23 Q You guys go to high school together?

24 A No.

25 Q Where did you meet her?