

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

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

**DEFENDANT ROCKY GREGORY’S FINAL EXHIBIT LIST**

COMES NOW, the Defendant, Rocky Gregory, by and through his counsel, and pursuant to this Court’s Scheduling Order [Doc. No. 299] submits this Final Exhibit List.

**EXHIBITS EXPECTED TO BE USED:**

No.	Exhibit	Objection	Rule Relied Upon
1.	Affidavit of Rocky Gregory attached to Information filed in <i>State v. Martinez</i> , CF-2011-2327		
2.	08/31/11 Amended Information filed in <i>State v. Martinez</i> , CF-2011-2327		
3.	08/29/12 Judgment and Sentence in <i>State v. Martinez</i> , CF-2011-2327		
4.	06/24/11 Pre-Determination Hearing Notice to Martinez		
5.	07/25/11 Martinez Resignation Letter		
6.	12/20/13 S. Hill Arrest Report Case No. 13-107611		
7.	All reports of R. Gregory Case No. 14-078745 to include evidence gathered in this case. (Hill)		

8.	All Reports of R. Gregory, OCPD Case No. 14-068166 to include evidence gathered in this case including AVL of Holtzclaw's vehicle, communications with other OCPD units. (Barnes)		
9.	Information and Probable Cause in <i>State v, Holtzclaw</i> , CF-2014-5869-		
10.	09/26/14 Amended Information and Probable Cause Affidavit, <i>State v, Holtzclaw</i> , CF-2014-5869		
11.	All reports of R. Gregory, OCPD Case No. 14-068786 (Raines)		
12.	All reports of R. Gregory, OCPD Case No. 14-066183 (Mathis)		
13.	Second Amended Information and Probable Cause Affidavit in <i>State v, Holtzclaw</i> , CF-2014-5869		
14.	Third Amended Information and Probable Cause Affidavit in <i>State v, Holtzclaw</i> , CF-2014-5869		
15.	All reports of OCPD Case No. 14-041539 (Morris) including but not limited to all recordings of the interviews of Morris, 911 recordings of Shelton's telephone call, refusal to prosecute form, photograph lineup and results shown to Ms. Morris; AVL of Holtzclaw's vehicle on 05/08/14, OCPD computer records regarding Holtzclaw's contact with Ms. Morris on 05/08/14; emails to and from all City employees regarding the search for the officer who allegedly assaulted Ms. Morris on 05/20-05/21/14; photographs		
16.	Transcription and video of Interview of Holtzclaw by Davis and R. Gregory		

17.	Arrest Report of Gregory OCPD Case No. 14-041539 (028)		
18.	Thomas Report, OCPD Case No. 14-041539 (001)		
19.	Gregory Report, OCPD Case No. 14-041539 (009)		
20.	09/08/11 Kuhlman Memo		
21.	All OCPD Reports, OCPD Case No. 14-44803 emails from various individuals regarding this claim (imposter claim)		
22.	Gregory Report, OCPD Case No. 14-041539 (027)		
23.	Any and all Informations filed by the State of Oklahoma against any of the Plaintiffs and Judgments and Sentences in those cases on these Plaintiffs, OK Dept. of Corrections “rap sheets.”		
24.	Documents from Holtzclaw’s pre-employment/employment file including but not limited to: Syllabus for Recruit Class #128; policies and procedures not already listed regarding sexual harassment; in-service training of Holtzclaw.		
25.	Body worn camera footage of Ms. Ligons and Officer J. DeSpain on 04/11/18		
26.	Warrants for Ms. Ligons from citations given regarding traffic accident on 04/11/19		
27.	City Notice of Allegations Against Holtzclaw		
28.	12/31/14 Memo from Deputy Chief Jester to Chief Citty		
29.	06/08/15 Termination Letter to Holtzclaw		
30.	All Plaintiffs’ Responses to Defendants Citty’s, City’s and Gregory’s Interrogatories		

	All exhibits listed by other Defendants not otherwise objected to by this Defendant		
	All exhibits listed by Plaintiffs not otherwise objected to by this Defendant		

**EXHIBITS WHICH MAY BE USED:**

No.	Exhibit	Objection	Rule Relied Upon
31.	OCPD investigations into the complaints of sexual assaults by OCPD officers 01/01/11 through 10/2014		
32.	All Reports of OCPD Case No. 14-070895 (Grate)		
33.	All reports of OCPD Case No.14-085523 (Copeland)		
34.	All reports of OCPD Case No.14-066104 (Ellis)		
35.	All reports of OCPD Case No.14-083092 (Bowen)		
36.	All OCPD Reports, OCPD Case No. 14-066583 (Johnson); AVL of Holtzclaw's on the date of this assault and all records of Holtzclaw's "running" this victim's name through the OCPD computers		
37.	All OCPD Reports, OCPD Case No. 14-076818 (Lyles); AVL of Holtzclaw's on the date of this assault and all records of Holtzclaw's "running" this victim's name through the OCPD computers		
38.	Video of traffic stop of Ligons by Holtzclaw		

39.	All OCPD Reports, Case No. 14-049050 (Ligons); AVL of Holtzclaw’s on the date of this assault and all records of Holtzclaw’s “running” this victim’s name through the OCPD computers		
40.	All OCPD Reports, Case No. 14-083072 (Gardner); AVL of Holtzclaw’s on the date of this assault and all records of Holtzclaw’s “running” this victim’s name through the OCPD computers		
41.	OCPD Forensic Lab File on Ligons and Gardner		

Respectfully Submitted,

Kenneth Jordan  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of April 2021, I electronically transmitted the attached Defendant Gregory's Final Exhibit List to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Melvin Hall, mhall@riggsabney.com; Damario Solomon-Simmons, dsimmons@riggsabney.com; Benjamin Crump, bcrump@parkscrump.com; and Kymberli Heckenkemper, heckenkemper@riggsabney.com, Attorneys for Plaintiffs Morris, Johnson, Lyles, Ligons and Hill; Cody E. Gilbert, gilberlawok@gmail.com, Attorney for Plaintiff Barnes; and James L. Hankins, jameshankins@ocdw.com, Attorney for Defendant Holtzclaw.

/s/ Richard N. Mann