

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

<ol style="list-style-type: none"> 1. SHERRY ELLIS, et al.,) 2. TABATHA BARNES, et al.) 3. ADAIRA GARDNER,) 4. ROSETTA GRATE,) <p style="text-align: center;"><i>Plaintiffs,</i>)</p>) vs.)	NOS. CIV-16-019-HE CIV-16-184-HE CIV-16-349-HE CIV-16-412-HE
<ol style="list-style-type: none"> 1. DANIEL HOLTZCLAW,) 2. THE CITY OF OKLAHOMA CITY) a municipal corporation,) <p style="text-align: center;"><i>Defendants.</i>)</p>))	

DEFENDANT HOLTZCLAW'S FINAL LIST OF WITNESSES

COMES NOW THE DEFENDANT, DANIEL HOLTZCLAW, and identifies the following list of witnesses to be used in the trial of this action:

WITNESSES DEFENDANT HOLTZCLAW EXPECTS TO CALL

No.	Witness	Anticipated Subjects of Testimony and/or Knowledge
1.	Michael J. Spence, Ph.D. Spence Forensic Resources 2455 E. Missouri Ave. Suite A Las Cruces, NM 88001	<ul style="list-style-type: none"> Qualifications: Dr. Spence's education and experience as an expert in forensic biology and DNA; Expert opinion that absolutely no indication of vaginal fluid was ever found on the fly of Defendant Holtzclaw's uniform pants. This specifically addresses contradictory testimony from the Oklahoma City Police Department (OCPD) DNA lab analyst, Elaine Taylor; Expert opinion on the universally recognized use of Alternate Light Sources (ALS), and the presumptive utility of these tests for indicating the absence of vaginal secretions;

		<ul style="list-style-type: none"> ● Expert opinion on the Holtzclaw case forensic biology/DNA results from the fly of the defendant’s uniform pants, which can be a consequence of incidental, nonintimate DNA transfer; ● Expert opinion on the dynamics of DNA transfer, and all that has been revealed over the years—regarding this topic. Specifically, what is universally established on the transfer, persistence, prevalence, and recovery of DNA; ● Expert opinions on the misrepresentation of forensic testing, and perjury by the OCPD analyst, Elaine Taylor, at the trial of Defendant Holtzclaw; ● Expert opinions on misleading scientific statements from Prosecutor Gieger. This specifically addresses fraudulent assertions—during closing arguments—at the trial of Defendant Holtzclaw; ● Expert opinion on the fundamentals of DNA quantity measurements in crime labs. Specifically, the DNA-rich nature of vaginal secretions, based upon hundreds of case reviews and thousands of intimate samples from female subjects, from which remarkably high quantities of DNA are observed, due to the presence of these vaginal secretions; ● Expert opinion on the absence of any informative forensic biology/DNA data associated with plaintiffs other than Plaintiff Gardner—for example, SANE kit results; ● Expert opinion that an unidentified full male DNA profile (not Defendant Holtzclaw) was revealed on Item 17Q1 from the officer’s uniform pants—by OCPD analyst Elaine Taylor; ● Expert opinion that an unidentified full male DNA profile (not Defendant Holtzclaw) was revealed on a chair back within Plaintiff Grate’s bedroom. This specifically addresses the statement that Plaintiff Grate wiped fluid—after allegedly being sexually assaulted by Defendant Holtzclaw; ● Topics referenced in Dr. Spence’s report—released on July 1, 2020.
2.	<p>Brent E. Turvey, Ph.D. Forensic Solutions, LLC P.O. Box 2175 Sitka, Alaska 99835</p>	<ul style="list-style-type: none"> ● Qualification as an expert in forensic science, forensic criminology, crime scene analysis, linkage analysis, sex crimes investigation, and false reporting; ● Expert opinions regarding law enforcement Crime

		<p>Scene Analysis and Linkage Analysis methods and findings;</p> <ul style="list-style-type: none"> ● Expert opinions regarding examiner Crime Scene Analysis and Linkage Analysis methods and findings; ● Expert opinions regarding investigative and forensic practices, including: interview practices; investigative and forensic practices; and failure to consider evident red flags for false reporting; ● Any other topics referenced in Turvey, Brent "Forensic Report: CRIME SCENE ANALYSIS & CASE LINKAGE" dated July 1, 2020.
<p>3.</p>	<p>Jeffrey S. Neuschatz, Ph.D. 2506 Thornton Court Huntsville, AL 35801</p>	<ul style="list-style-type: none"> ● Qualifications as an eyewitness memory expert witness; ● Expert overview of scientific research on memory and eyewitness identification, and the role of mistaken identifications in wrongful convictions; ● Expert opinions on factors, such as unconscious transference and misleading post-event information, that may impact plaintiffs' memories of events and create the possibility that plaintiffs may be confusing Defendant Holtzclaw with someone else who committed the alleged crime; ● Topics referenced in his report.
<p>4.</p>	<p>Demetria Campbell % Attorney Cynthia D'Antonio</p>	<ul style="list-style-type: none"> ● Complainant who filed a lawsuit against the City of Oklahoma City and Defendant Holtzclaw, whom she dropped from the lawsuit after the City agreed to settle despite stating in its legal documents that Ms. Campbell's claims were "outrageous," "opportunistic," and "too inconsistent to be true" ("Defendant City of Oklahoma City's Motion for Summary Judgment and Brief in Support," filed June 25, 2018, Case No. CJ-2015-4217 in the District Court of Oklahoma County State of Oklahoma); ● Can testify that she admitted during her deposition under oath on Feb. 15, 2018, that while speaking with Defendant Holtzclaw's supervisor, Lt. Brian Bennett, "I did not tell him that I thought he [Holtzclaw] used unnecessary force," (p. 178) and she admitted that Defendant Holtzclaw apologized for having to handle her physically and that she told him, "I'll forgive you" (p. 193); ● Can testify about waiting nearly a year to make her

		<p>allegations when the Oklahoma County District Attorney filed charges against Defendant Holtzclaw;</p> <ul style="list-style-type: none"> ● Can testify about her changing allegations that initially contained no sexual component, but then shifted to include one only after criminal sexual assault allegations were made against Defendant Holtzclaw; ● Can testify about omitting her claim that Defendant Holtzclaw acted in a “perverted” manner from all contemporaneous medical records and interactions with both police, hospital personnel, and her personal physician; ● Can testify per discovery materials.
<p>5.</p>	<p>Plaintiff Shardayreon Hill % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw, who was acquitted in his criminal trial of all charges arising from her claims; ● Can testify that when she first encountered Defendant Holtzclaw and other officers in December 2013, she was using PCP and grabbed a glass vial with her mouth, crunched down on it with her teeth, and shattered it inside her mouth (Trial Transcript p. 1329); ● Can testify that her ingestion of PCP led her to be rushed to the hospital, where she told doctors she had not ingested PCP (ER report December 20, 2013) and where she alleged, nine months later, that Defendant Holtzclaw had sexually assaulted her in the hospital room; ● Can testify per her video interview in September 2014 that she told Det. Rocky Gregory: “Even if like, even if he [Defendant Holtzclaw] didn’t like even rape nobody or nothing, he’s still getting ... he’s been in contact with people that he’s arrested”; ● Can testify per discovery materials.
<p>6.</p>	<p>Plaintiff Tabatha Barnes % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw that she first reported to police after they contacted her in August 2014 by using his police records of interactions with Plaintiff Barnes in February and March, 2014; ● Can testify that she stated repeatedly in her deposition on October 30, 2018, that Defendant Holtzclaw never touched her: “He didn’t touch me. He didn’t touch me. He did not touch me. He

		<p>didn't touch me" (pp. 77, 78, 99, 100);</p> <ul style="list-style-type: none"> ● Can testify per her deposition that the first time she met Det. Rocky Gregory, he "told me why he was there, investigating sexual assault, Daniel Holtzclaw. But at the time when he said the name, I didn't know what he was talking about, because I never knew his name" (pp. 81-82); ● Can testify that she told detectives she used Seroquel 300 and during the trial she testified that this medication was prescribed by her psychiatrist Dr. Al-Khouri (Trial Transcript pp. 1810, 1870), but in her response to the Civil Lawsuit Interrogatory 9 she stated she had never been treated for a mental health or psychological condition, problem, or issue, and she had no "mental/psychological/emotional health records for the period of January 1, 2009 to the present"; ● Can testify that she knows complainant Ms. Mathis, who worked as her house cleaner before being stopped by Defendant Holtzclaw; ● Can testify per discovery materials.
<p>7.</p>	<p>Plaintiff Carla Raines % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw, who was acquitted in his criminal trial of all charges arising from her claims, which she first reported to police after they contacted her in August 2014 by using Defendant Holtzclaw's police records of interactions with Plaintiff Raines in March 2014; ● Can testify per the police interview audio recording on August 15, 2014, that when Det. Rocky Gregory asked if she has ever come into any contact where an officer has been inappropriate with her or had to expose herself to him in the past year, she replied, "No," or, "Uh-uh," seven times, before saying, "There's only one officer that I know a few years back [...] he's a black cop that used to come around here [...] I was on the South side [...] at the gas station, and he exposed his self to me. That was a black officer. I guess they was doing some sort of sting, or whatever, and he exposed his self to me"; ● Can testify, per the police interview audio on August 15, 2014, that Det. Gregory advised her during their interview that he had a possible tip that maybe she was the victim of a sexual assault, they have several victims, and they "are trying to go back on

		<p>this guy, and he’s a pretty bad guy”;</p> <ul style="list-style-type: none"> • Can testify that after further questioning by Det. Gregory, she said an officer [Defendant Holtzclaw] had stopped her and motioned for her to pull her shirt and bra up to check for hidden drugs but did not tell her to do so, and she simply felt like she had to lift her shirt and bra to expose her breasts; • Can testify per discovery materials.
8.	Florene Mathis	<ul style="list-style-type: none"> • Complainant will testify about her allegations against Defendant Holtzclaw, who was acquitted in his criminal trial of the charges arising from her claims, which she first reported to police after they contacted her in August 2014 by using Defendant Holtzclaw’s police records of interactions with Ms. Mathis in April 2014; • Can testify that Det. Kim Davis contacted Ms. Mathis and advised her that she “may have been sexually assaulted by an Oklahoma City Police Officer”; • Can testify that she thought an officer who stopped her in December 2013 was the officer who allegedly sexually assaulted her later; • Can testify that she knows Plaintiff Barnes, worked for her as a house cleaner, and smoked crack cocaine with her before being stopped by Defendant Holtzclaw; • Can testify that she told Det. Davis that she was under the influence of alcohol and crack cocaine when Defendant Holtzclaw stopped her; • Can testify that she was incarcerated for Assault with a Deadly Weapon charges at the time that Det. Davis approached her about the Holtzclaw case; • Can testify that she acknowledged at the criminal trial that she “may have” provided at least six different Social Security numbers to law enforcement (Trial Transcript p. 2352), she had been arrested more than 30 times over the years (Trial Transcript p. 2311), and she acknowledged that she had been convicted of fighting with at least seven police officers from seven different jurisdictions (Trial Transcript p. 2328); • Can testify per discovery materials.
9.	Plaintiff Rosetta Grate % Counsel for Plaintiffs	<ul style="list-style-type: none"> • Plaintiff will testify about her allegations against Defendant Holtzclaw that she first reported to

		<p>police after they contacted her in August 2014 by using Defendant Holtzclaw’s police records of his interactions with Plaintiff Grate in April 2014;</p> <ul style="list-style-type: none"> ● Can testify that she used crack cocaine purchased with her prostitution money at a house called “the Ramp” and that when Defendant Holtzclaw had contact with her, she was at that location in order to go to “The Ramp” to buy crack cocaine with money she got from prostituting, and she had been smoking crack cocaine at the time when she first came into contact with Officer Holtzclaw (Trial Transcript p. 2524); ● Can testify that she alleged oral sodomy (leading to a Guilty Verdict) and rape (leading to an Acquittal), and that she wiped the liquid from her mouth on the back of a chair in her bedroom; ● Can testify that she had multiple felony convictions (Trial Transcript pp. 2609-10) and a documented history of lying to the police (Trial Transcript p. 2519); ● Can testify that she was first interviewed by detectives in the Oklahoma County Jail, and testified in the trial while in the custody of the Oklahoma County Sheriff’s Office due to relapsing in her drug use program (Trial Transcript p. 2519); ● Can testify per discovery materials.
<p>10.</p>	<p>Plaintiff Regina Copeland % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw that she first reported to police after they contacted her in October 2014 by using Defendant Holtzclaw’s police records of interactions with Plaintiff Copeland in April 2014; ● Can testify per the recorded interview with Det. Davis on October 4, 2014, that Plaintiff Copeland said “the only reason I came forward” was that her sister said Det. Davis had told the sister that Plaintiff Copeland had been sexually assaulted; ● Can testify that before Plaintiff Copeland talked with Detectives Davis and Homan, who drove to Texas to speak with her, Plaintiff Copeland and her daughter got on the Internet and looked up articles regarding Officer Holtzclaw and found a picture of him (Trial Transcript p. 2930); ● Expected to testify about her allegation that although she was not sober, Defendant Holtzclaw allegedly let her drive her own vehicle to park it in

		<p>front of her relative’s house, while Holtzclaw allegedly followed her in his patrol car down that street and stopped alongside her car in front of the house before allegedly raping her on a house’s lot at the end of the street;</p> <ul style="list-style-type: none"> ● Can testify that her description of the time length of the alleged rape decreased from “a long time” (Det. Davis interview with Plaintiff Copeland) to “about five to ten minutes” (11/17/14 Preliminary Hearing Transcript, p. 75) down to “maybe about three minutes or so” at trial (Trial Transcript p. 2831); ● Can testify per discovery materials.
<p>11.</p>	<p>Plaintiff Sherry Ellis % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw that she first reported to police after they used Defendant Holtzclaw’s police records of interactions with Plaintiff Ellis in May 2014 to contact her associates in July 2014, and then message her on Facebook in August 2014; ● Can testify per the police audio recording of her first phone call with Det. Davis that the detective told her she had received a tip that Plaintiff Ellis might have been sexually assaulted by a police officer; ● Can testify per audio and video recordings of police interviews that she told the detective her assailant was a black officer with skin a shade darker than her own, and she indicated he was several inches shorter than her own height of 5'11"; ● Can testify per the police video recording from August 5, 2014, that even after telling Det. Davis the suspect description, Det. Davis said, “Sherry. I believe you. If I didn’t believe you, I wouldn’t have been calling you trying to find you. [...] I want to get a DNA sample from you today. And the reason I want to get a DNA sample is because I know what officer did this to you, okay? And there is some unknown female DNA on his pants that I took and I wanna see if it’s yours”; ● Can testify about her mental health evaluations and medications, and whether detectives ever asked her about details of those issues; ● Can testify per the video recording of the August 5, 2014, interview that Plaintiff Ellis asked Det. Davis for help with unpaid Oklahoma County fines, to which Det. Davis said she would make a call on

		<p>Plaintiff Ellis’ behalf the following day to “find out what we can do”;</p> <ul style="list-style-type: none"> ● Can testify per discovery materials.
12.	Plaintiff Terri Morris % Counsel for Plaintiffs	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw, who was acquitted in his criminal trial of all charges arising from her claims, which she first reported to police on May 24, 2014; ● Can testify about the facts and circumstances of making her initial allegation against an unknown officer after a 911 phone call on May 24, 2014, by her former boyfriend because she was damaging his vehicle while she was under the influence of drugs; ● Can testify per the police video recording of her interview with Det. Gregory that initially she refused to prosecute and she disclosed she has been diagnosed with paranoid schizophrenia, yet Det. Gregory continued to seek specifics of her allegation even when she told him, “Please, please, I just want to leave it alone. I don’t want to be a part of nothing no more. Don’t do this to me please. God help me Jesus. Jesus help me” (Police Interview on June 3, 2014); ● Can testify that she was unsure of the identify of the police officer, and she picked out two possibilities from a photo lineup; ● Expected to testify that she initially alleged a date, a black and white patrol car color, and a location (Trial Transcript pp. 3212, 3302, 3159, 3175) that did not match the timing, whereabouts, and black color of Defendant Holtzclaw’s patrol car, but that after further questioning by Det. Gregory and while Plaintiff Morris was in jail, she changed the location of the alleged sexual assault; ● Can testify per discovery materials.
13.	Syrita Bowen % Counsel for Plaintiffs	<ul style="list-style-type: none"> ● Complainant will testify about her allegations against Defendant Holtzclaw that she first reported to police after they contacted her in October 2014 by using Defendant Holtzclaw’s police records of interactions with Ms. Bowen in May 2014; ● Can testify that during Plaintiff Bowen’s first phone conversation with Det. Davis on Oct. 2, 2014, the detective opened up the conversation by stating that she had received a tip that Ms. Bowen

		<p>was a possible victim of inappropriate behavior involving an Oklahoma City police officer”;</p> <ul style="list-style-type: none"> ● Can testify that she had seen Defendant Holtzclaw’s photo on the news before making her allegations; ● Can testify about the circumstances of being stopped by Defendant Holtzclaw because she was under the influence of alcohol and that he asked her about a woman named “Rose” and a nearby drug house, which Ms. Bowen denied was a drug house; ● Can testify that she had a history of prison time (due to false declaration to a pawnbroker and concealing stolen property) and lying to police, including causing a warrant to be issued for her underaged daughter’s arrest by falsely telling law enforcement that her daughter’s name was her own (Trial Transcript pp. 3401; 3406-7); ● Can testify that she has used at least five different Social Security numbers, a real one and then four that are not real; ● Can testify per the trial transcript about her changing claims of firing her counsel, Tony Coleman: although he had just testified that morning that he was her attorney, Plaintiff Bowen testified that she had fired him that day, before next stating that he had never been her attorney in the past, before finally testifying, “I fired him over the phone about a week ago” (Trial Transcript pp. 3393, 3395, 3397); ● Can testify per discovery materials.
<p>14.</p>	<p>Plaintiff Carla Johnson % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw that she first reported to police after they contacted her in August 2014 by using Defendant Holtzclaw’s police records of interactions with Plaintiff Johnson in May 2014; ● Can testify that Det. Davis told Plaintiff Johnson that police had a tip that she had been sexually assaulted by a member of the Oklahoma City Police Department; ● Can testify per her deposition testimony that police officers suggested Daniel Holtzclaw’s name as her assailant; ● Can testify that she told detectives the officer allegedly fondled her breasts on top of her clothing and that she was not wearing a bra (Trial Transcript

		<p>p. 3522), then later testified at the preliminary hearing that he touched her breasts under her shirt and bra, and that she was positive he touched his hand on her bare breast, and they were skin to skin (11/17/14 Prelim. Hearing, pp. 109, 133-34), before at trial testifying that said that the officer had touched her on top of her shirt (Trial Transcript pp. 3524, 3528);</p> <ul style="list-style-type: none"> ● Can testify that she had seven felony convictions and had done time in a penitentiary including for escape from a penitentiary, and she admitted at trial that she smoked crack on a regular basis (Trial Transcript pp. 3521, 3525); ● Can testify that she admitted in her deposition that she has a mental health history, contradicting her statement to Detectives Davis and Homan; ● Can testify per discovery materials.
15.	Plaintiff Adaira Gardner % Counsel for Plaintiffs	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw that she first reported to police after they contacted her mother in October 2014 by using Defendant Holtzclaw’s police records of interactions with Plaintiff Gardner on June 17, 2014; ● Can testify about the facts and circumstances of her mother’s report that she was a runaway and had hit her mother 4 to 5 times in the face and arms on the morning of June 17, 2014; ● Can testify about the circumstances and her claims about the two stops by Defendant Holtzclaw on June 17, 2014, the first being when she was with Melodie Coleman and Nathaniel Davis; ● Can testify about her mental health evaluations, medication use, and drug use before, during, and after the date of June 17, 2014; ● Can testify that after detectives contacted her mother, her mother contacted her about Defendant Holtzclaw while Plaintiff Gardner was in Detroit; ● Can testify per her deposition that before she testified in the criminal trial, “I was in the witness room or whatever that room is called where they have the witnesses waiting to go testify, I was there and [Prosecutor] Gayland Geiger came to me and he told me I believe you, out of all the other women I believe you. And I said why. And he said, because we were looking for a match of DNA that

		<p>we found inside his police pants and it was you, we found your vaginal fluid on the inside and outside his police pants. [...] He encouraged me to testify because it was – it would help the other women if I testified because I was the only one with physical evidence” (Adaira Gardner deposition, pp. 146-147);</p> <ul style="list-style-type: none"> ● Can testify about facts and circumstances concerning her arrests and convictions including an arrest in Missouri in 2020; ● Can testify per discovery materials.
<p>16.</p>	<p>Plaintiff Kala Lyles % Counsel for Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw, who was acquitted in his criminal trial of all charges arising from her claims, which she first reported to police after they contacted her in September 2014 by using Defendant Holtzclaw’s police records of interactions with Plaintiff Lyles on June 18, 2014; ● Can testify that she made her allegations to her probation officer in September 2014 after local news media reported Defendant Holtzclaw was a serial rapist suspect and showed his photo (Standard Supplement Report by Kim Davis, September 17, 2014, p. 1; R. 3645, 3653), but that when she met with her probation officer in July 2014 -- after the alleged sexual assaults took place but before the news media reported Holtzclaw’s name -- she did not mention the alleged sexual assault (Trial Transcript p. 4255); ● Will testify that an officer who issued her tickets about one year prior to the alleged sexual assault by Defendant Holtzclaw was the same as the officer who allegedly sexually assaulted her; ● Can testify that at trial she stated the alleged rape lasted “20 to 30 minutes” (Trial Transcript p. 3627), but she initially told officers it was only “5 to 10 minutes”; ● Can testify per her deposition on December 13, 2018, that the only way she could describe the appearance of her assailant’s face was that he had “a white man face” and she could not remember anything else about his appearance (pp. 100-101); ● Can testify per her deposition that she is friends with both Plaintiff Carla Johnson and Plaintiff Terri Morris, whom she knew before she had any

		<p>interactions with Defendant Holtzclaw; additionally, she claims she only first learned within the six months before the deposition that Plaintiff Morris alleged she was also sexually assaulted (pp. 60-62);</p> <ul style="list-style-type: none"> ● Can testify per discovery materials.
17.	Plaintiff Jannie Ligons % Counsel for Plaintiffs	<ul style="list-style-type: none"> ● Plaintiff will testify about her allegations against Defendant Holtzclaw that she reported to police several hours after Defendant Holtzclaw stopped her vehicle at 2 AM on June 18, 2014; ● Can testify that her driver's license has been suspended for more than 30 years but she denied knowing this at the time of the traffic stop on June 18, 2014; ● Can testify that her fiance at the time, Mr. Richard Long, did not usually let her drive his car, and she can testify why; ● Can testify that she had smoked marijuana prior to driving that morning, but she did not disclose this to the officer; ● Can testify that she told Det. Davis the officer who allegedly sexually assaulted her was blond, parted his hair on the side, had skin that was not smooth, was 5'7" – 5'9", and was 35-45 years old (Standard Supplement Report, Reported Date 06/18/14, with Janne [sic] Pearl Ligons, by Det. K. Davis, typed 7/24/14, p. 4); ● Can testify about her recent July 4, 2020, arrest in Spencer, OK, for speeding and driving on a suspended license in a car with a tag registered to another vehicle, after Plaintiff Ligons claimed to the officer that she had a valid license but she didn't have it on her; ● Can testify per discovery materials.
18.	Elaine M. Taylor 7425 NW 103rd Ter. Oklahoma City, OK 73162-4455	<ul style="list-style-type: none"> ● Former OCPD DNA Lab Forensic Analyst who completed the forensic work in Defendant Holtzclaw's case and testified at his criminal trial; ● Can testify about her forensic testing, conclusions, and trial testimony in the Holtzclaw case; ● Can testify about her decision-making process for forensic testing of evidence in the Holtzclaw case; ● Can testify about whether she believed Mr. Holtzclaw's DNA was not on the fly of his pants, and why she testified that his DNA was not found;

		<ul style="list-style-type: none"> ● Can testify about why she felt it was “unfortunate” that Defendant’s DNA was not found in Plaintiff Ligons’ SANE kit; ● Can testify about her handling and storage of Mr. Holtzclaw’s uniform pants and belt in the DNA lab; ● Can testify about her familial relationship with Det. Rocky Gregory; ● Can testify about her contamination event logs; ● Can testify about her conversations with Prosecutor Gieger about whether vaginal fluid was detected on the fly of Mr. Holtzclaw’s pants; ● Can testify about if and when she informed detectives about unknown male DNA on the fly of Mr Holtzclaw’s pants; ● Can testify about OCPD’s past practice of burning old evidence in a big ol’ hole by the river. ● Can testify per her deposition and discovery materials.
19.	Campbell Ruddock % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD DNA Lab Manager who supervised Forensic Analyst Elaine Taylor and reviewed her trial testimony both after her trial and in a written review of her Holtzclaw Trial testimony after her retirement and after Defendant Holtzclaw filed his direct appeal on February 1, 2017; ● Can testify about the reality of non-intimate DNA indirect transfer and that finding DNA on clothing does not mean vaginal fluid is present; ● Can testify about incorrect and/or confused testimony by Ms. Taylor in the Holtzclaw criminal trial; ● Can testify about the process by which he was asked to review Ms. Taylor’s Holtzclaw Trial testimony after February 1, 2017; ● Can testify about OCPD procedures for releasing his reviews of a DNA analyst’s testimony to agencies outside OCPD, such as private Accreditation Agencies; and whether his review of Ms. Taylor’s Holtzclaw trial testimony was released to agencies outside OCPD, when, and why; ● Can testify per his deposition, discovery materials, and specifically the Holtzclaw trial transcript of Ms. Taylor’s testimony.
20.	Brandt Cassidy, Ph.D.	<ul style="list-style-type: none"> ● Former Laboratory Director at DNA Solutions (755

	<p>Forensic Science Institute Box 203 University of Central Oklahoma 100 N. University Dr. Edmond, OK 73034</p> <p>Also: 1029 Walnut Rd. Norman, OK 73072-6934</p>	<p>Research Parkway, Suite 510, Oklahoma City, OK 73104) who was hired as a DNA consultant by Daniel Holtzclaw’s trial counsel Scott Adams to review the forensic evidence in the case;</p> <ul style="list-style-type: none"> ● Can testify about the contents of his Case Review: St. v. Daniel Holtzclaw, Case Number: CF-2014-5869; ● Can testify about whether he informed Mr. Holtzclaw’s criminal trial defense counsel Scott Adams that unknown male DNA was found on the fly of Defendant’s uniform pants; ● Can testify about whether he informed Mr. Holtzclaw’s criminal trial defense counsel Scott Adams that the prosecution’s DNA analyst, Ms. Taylor, testified falsely during the jury trial that Mr. Holtzclaw was excluded from being a possible contributor to DNA on the fly of his pants.
<p>21.</p>	<p>Gayland Gieger Oklahoma County District Attorney’s Office 320 Robert S. Kerr Avenue, Room 505 Oklahoma City, OK 73102</p>	<ul style="list-style-type: none"> ● Oklahoma County Assistant District Attorney and prosecutor in Daniel Holtzclaw’s criminal trial; ● Can testify about his knowledge of whether the District Attorney’s office told one or more OCPD detectives or investigators to stop using photo lineups in the Holtzclaw case, and if that decision not to use photo lineups began with Plaintiff Ligons; ● Can testify about whether Ms. Taylor discovered evidence of vaginal fluid on the fly of Mr. Holtzclaw’s pants; ● Can testify about his statements in his Motion to Increase Bond (Sept. 26, 2014) and in the Hearing about a Bond Increase Motion (Oct 2, 2014) that he believed the female DNA on the fly of Defendant Holtzclaw’s uniform pants meant sexual contact had occurred; ● Can testify about his reasons for requesting additional DNA testing of the fly of Mr. Holtzclaw’s pants just prior to the criminal trial; ● Can testify about whether the prosecution offered any deals or benefits to accusers, such as offers of drug rehab, aid with fines, dropping of charges, or decisions not to prosecute; and why the District Attorney’s office has dropped charges against various plaintiffs; ● Can testify about his Holtzclaw trial statements, including his statement to the jury that Mr.

		<p>Holtzclaw’s DNA was not found on the fly of his pants;</p> <ul style="list-style-type: none">● Can testify about whether Ms. Taylor’s trial testimony was correct that no male DNA was found inside the fly of Mr. Holtzclaw’s pants;● Can testify about his conversation with Plaintiff Gardner in which she recalls he told her just prior to her Holtzclaw trial testimony that “we found your vaginal fluid on the inside and outside his police pants”;● Can testify about the whether he told the truth in his Holtzclaw trial closing argument statement that “the most important thing about Adaira Gardner is the fact that DNA from the walls of her vagina was transferred in vaginal fluids” (Trial Transcript p. 4307);● Can testify about his false statements about the Holtzclaw case forensic evidence in his KOKO 5 news interview publicly released Feb. 5, 2016, in which Prosecutor Gieger stated after the trial, "The skin cells were transferred through the body fluids of a 17-year-old girl after he raped her. That's what the evidence was. That's what the jury heard and certainly that's what they convicted him of. They [the defense] tried to explain DNA from a 17-year-old girl that ends up inside his pants at the areas where his privates are. Quite frankly, their explanation was not believable because you can't explain that" (Erielle Reshef, KOKO 5 News, "Prosecutors who helped convict Daniel Holtzclaw speak," Feb. 5, 2016).● Can testify about his false statements about the Holtzclaw case forensic evidence in his News 4 interview publicly released Dec. 15, 2016, in which Prosecutor Gieger stated: "The fluid containing the skin cells is absorbed into the pants. That's what we have. If Mr. Holtzclaw or his supporters are advocating that there is a test that determines that this is vaginal fluid, they are lying. There is no test that does that. If what they are trying to get people to believe, which is not accurate, is that it could transfer from a purse, to hands, to pants, to inside of pants, uh, significantly, Daniel Holtzclaw's own DNA was not found on the inside of his uniform pants. I think that speaks probably louder than anything I could argue as to the ability of
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		<p>someone's skin cells from their hands to get transferred to a piece of fabric." (Ali Meyer (2016, Dec. 15). EXCLUSIVE: Daniel Holtzclaw's family speaks out about conviction, appeal one year later. Oklahoma City, News 4);</p> <ul style="list-style-type: none"> ● Can testify that during the Defendant Holtzclaw's criminal trial in 2015, the trial transcript shows that Prosecutor Gieger informed the Court that Plaintiff Barnes "refused to testify and tried to leave" the courthouse "at one point over the lunch hour," but "Oklahoma City police detained her [...] for disorderly conduct and public intoxication because she was not being coherent and she was making somewhat of a scene [...] in the hallway" (Trial Transcript pp. 1857-1858); ● Can testify that Plaintiff Barnes then testified at Defendant Holtzclaw's criminal trial that "No, I didn't say that [...] That's not correct. That's incorrect [...] That one right there is not true," about the claim in her civil lawsuit filed by her attorney Mark Hammons that "on March 25th he [Defendant Holtzclaw] broke into the home of T.B. and sexually assaulted her"; additionally, Ms. Barnes testified that her civil lawsuit was "Not in my signature it's not," and she did not know that her civil lawsuit had been removed to federal court" (Trial Transcript pp. 1953-1959); ● Can testify per discovery materials.
22.	<p>Ali Meyer KFOR-TV & KAUT 444 E. Britton Rd. Oklahoma City, OK 73114</p>	<ul style="list-style-type: none"> ● Journalist with Oklahoma News 4 who interviewed Prosecutor Gieger and released the interview video in a Dec. 15, 2016 article entitled, " EXCLUSIVE: Daniel Holtzclaw's family speaks out about conviction, appeal one year later," by News 4 in Oklahoma City; ● Can testify per her news report about Prosecutor Gieger's public statements about the Holtzclaw DNA evidence.
23.	<p>Lori McConnell Oklahoma County District Attorney's Office 320 Robert S. Kerr Avenue, Room 505 Oklahoma City, OK 73102</p>	<ul style="list-style-type: none"> ● Oklahoma County Assistant District Attorney and prosecutor in Daniel Holtzclaw's criminal trial; ● Can testify about her Holtzclaw trial closing argument encouraging jurors to consider the totality of evidence in all the allegations to convict Mr. Holtzclaw (Trial Transcript p. 4188);

		<ul style="list-style-type: none"> • Can testify about her knowledge of whether the District Attorney's office told Detective Kim Davis to stop using photo lineups in the Holtzclaw case beginning with Ms. Ligons; • Can testify per discovery materials.
24.	<p>David Prater Oklahoma County District Attorney's Office 320 Robert S. Kerr Avenue, Room 505 Oklahoma City, OK 73102</p>	<ul style="list-style-type: none"> • Oklahoma County District Attorney; • Can testify about whether and when the District Attorney's office told detectives to stop using photo lineups in the Holtzclaw case after Ms. Terri Morris was shown a photo lineup; • Can testify about his repeated decisions not to file charges against Plaintiff Gardner and his decision to defer sentencing on her guilty plea in her assault on Officer Salyers; • Can testify about his decision to decline to file the criminal charges of felony robbery, assault and battery, larceny and unauthorized use of a motor vehicle for which police arrested Plaintiff Grate on June 26, 2020; • Can testify about whether a prosecutor should misrepresent forensic evidence in his closing argument to the jury; • Can testify per discovery materials.
25.	<p>Det. John High % Counsel for Defendant City</p>	<ul style="list-style-type: none"> • OCPD detective with Sex Crimes who was assigned to investigate the case of Plaintiff Ligons on June 18, 2014, and who testified at Defendant Holtzclaw's OCPD Pre-determination Hearing on Dec. 11, 2014, which led to OCPD's firing of Defendant Holtzclaw; • Can testify per Defendant Holtzclaw's Pre-D Hearing transcript (IA# 14-96, Part 1, p. 19) that "the DNA lab did, yes," find evidence on Defendant Holtzclaw's pants indicating sexual conduct although, he said, "I don't know the exact findings"; • Can testify about how he came to believe that the DNA lab found evidence indicating "sexual contact," such as the individual(s) who told him this.
26.	<p>Ronald James Hill 8316 Jason Drive Oklahoma City, OK 73135-</p>	<ul style="list-style-type: none"> • Juror in Holtzclaw criminal trial; • Can testify about his public statement to media that in reaching guilty verdicts on the rape allegations,

	6038	<p>“The DNA evidence was very crucial.” KOKO 5 News, <i>Only on KOCO 5: FULL INTERVIEW: Juror in Holtzclaw sexual assault case speaks about trial.</i> (Dec. 18, 2015). https://www.youtube.com/watch?v=pNocNciGIv4</p> <ul style="list-style-type: none"> ● Can testify about his media interview comments to KOKO 5’s reporter Jessica Schambach, whose report was made public on Dec. 18, 2015, in which he said some of the other Holtzclaw jurors were concerned for their safety if they did not reach guilty verdicts: when Ms. Schambach asked him, “I know you told me prior that you were never worried of anything getting out of hand, but were some of the other jurors concerned that things could get out of hand if the verdict didn’t go the way they wanted?” Juror Hill replied, “There was concern, you know, uh, there were, you know, people on the jury. I...I’m a big guy, you know, I just... it it didn’t bother me. I had faith that everything would be good.”
27.	Jessica Schambach 16512 Moorgate Ln. Edmond, OK 73012	<ul style="list-style-type: none"> ● Oklahoma KOKO 5 news anchor and reporter who interviewed juror Ron Hill from Defendant Holtzclaw’s criminal trial for the KOKO 5 News report, “<i>FULL INTERVIEW: Juror in Holtzclaw sexual assault case speaks about trial</i>” (Dec. 18, 2015) www.youtube.com/watch?v=pNocNciGIv4; ● Can testify about public statements made by juror Ron Hill that “There was concern, you know, uh, there were, you know, people on the jury,” that things could get out of hand if the verdict didn’t go the way protestors wanted.
28.	Daniel Speaks 4008 Overland Dr. Oklahoma City, OK 73115-2732	<ul style="list-style-type: none"> ● Juror in Holtzclaw criminal trial; ● Can testify about his public statement about the Holtzclaw case to Crime Watch Daily in which he said, “Well, I mean, I’m not a DNA expert. They told us it was DNA from the vaginal fluid from a 17-year-old. The DNA people are pretty boring to be honest with you.” <i>Crime Watch Daily Investigates the Case of Daniel Holtzclaw</i> (Telepictures Productions television broadcast Apr. 28, 2017); ● Can testify about his public statement to media about how the jury reached guilty verdicts in the Holtzclaw trial: “At first, Speaks said, a number of

		<p>jurors were ready to set Holtzclaw free because they didn't believe some of Holtzclaw's accusers. 'There was some jurors that – due to that fact [of] who these victims were – had a hard time believing them,' Speaks said. Speaks says that it was DNA evidence on the inside of Holtzclaw's pants and testimony involving a 17-year-old victim that helped get the deliberations moving." Susan Welsh <i>et al.</i>, <i>How the Daniel Holtzclaw Jury Decided to Send the Ex-Oklahoma City Police Officer to Prison for 263 Years</i>, ABC News (May 20, 2016).</p>
29.	<p>Benjamin L. Crump 122 South Calhoun Street Tallahassee, FL 32301 % Counsel for the Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiffs' attorney who made a false public claim about the Holtzclaw case DNA evidence in TV One's TV show, "Justice By Any Means: Jannie Ligons," that aired October 24, 2016; ● Can testify that he stated in the above-mentioned show that, "They had his [Defendant Holtzclaw's] DNA evidence inside one of the victim's panties"; ● Can testify about whether that information he claimed publicly about the forensic evidence is correct, based on the OCPD DNA lab documents, and whether he has informed any plaintiffs about his incorrect statement that Defendant Holtzclaw's DNA evidence was found inside a complainant's panties.
30.	<p>Melvin C. Hall 528 NW 12th Street Oklahoma City, OK 73103 % Counsel for the Plaintiffs</p>	<ul style="list-style-type: none"> ● Plaintiffs' attorney who made a false public claim about the Holtzclaw case DNA evidence in TV One's TV show, "Justice By Any Means: Jannie Ligons," that aired October 24, 2016; ● Can testify that he stated in the above-mentioned show that "they found vaginal DNA material on the inside of his trousers and that vaginal DNA matched the DNA of the 17-year-old"; ● Can testify whether his claim that they found vaginal DNA material is correct, based on the OCPD DNA lab documents, and whether he has told any of the plaintiffs that vaginal DNA material was found inside Defendant Holtzclaw's trousers.
31.	<p>Richard C. Smith % Counsel for Defendant City</p>	<ul style="list-style-type: none"> ● Municipal Counselor and Attorney for Defendant City, the City of Oklahoma City, in the current federal civil rights lawsuits and in the case of <i>Demetria M. Campbell, individually, Plaintiff, v. City of Oklahoma City, a municipality; and Daniel</i>

		<p>Holtzclaw individually, Case No. CJ-2015-4217 in the District Court of Oklahoma County State of Oklahoma;</p> <ul style="list-style-type: none">• Can testify that Ms. Campbell admitted during a deposition under oath on Feb. 15, 2018, that while speaking with Defendant Holtzclaw’s supervisor, Lt. Brian Bennett, "I did not tell him that I thought he [Holtzclaw] used unnecessary force," (p. 178) and she admitted that Defendant Holtzclaw apologized for having to handle her physically and that she told him, "I'll forgive you" (p. 193);• Can testify per his publicly available Demetria Campbell case legal document, "Defendant City of Oklahoma City’s Motion for Summary Judgment and Brief in Support," filed June 25, 2018, by him on behalf of the City of Oklahoma City, which stated that Ms. Campbell’s claims were "outrageous," "opportunistic," and "too inconsistent to be true": "At no time during Plaintiff Campbell’s examination by the medical staff at the hospital, nor during her interview with Lieutenant Bennett, did she complain or allege that Defendant Holtzclaw had an erection during the encounter and intentionally pressed the alleged erection against her while handcuffing her" (p. 5); "On November 3, 2014, Plaintiff Campbell, via her attorney, filed a Notice of Tort Claim with the Defendant City. The claim [...] failed to state a claim based on sexual battery," (p. 6); "On July 31, 2015, Plaintiff Campbell filed this instant Petition, alleging for the first time that Defendant Holtzclaw had an erection during the altercation and intentionally pressed it against her while he was handcuffing her" (p. 6); "...it is important to note that Plaintiff Campbell has suffered no wrong, intentionally or negligently" (p. 9); "...there are numerous inconsistencies in Plaintiff Campbell’s multiple versions of the events...Defendant City asserts that Plaintiff Campbell’s claims are too inconsistent to be true and are merely the product of an opportunity to piggyback onto the claims of certain individuals" who made allegations that led to the criminal trial (p. 11); "Probably the most outrageous portion of Plaintiff Campbell’s testimony is that she was able to tell that Defendant Holtzclaw had an erection and placed it against her
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		<p>butt for two minutes. This claim did not conveniently surface until nearly a year after the Oklahoma County District Attorney filed charges against Defendant Holtzclaw” (p. 12); “The fact that she now wants to change the narrative to fit the new allegation is telling of the opportunistic nature of this claim and severely cuts against her credibility” (p. 13);</p> <ul style="list-style-type: none"> ● Can testify per his written statements in the publicly available Demetria Campbell case legal document, “Defendant City’s Reply to Plaintiff’s Response to Defendant City’s Motion for Summary Judgment,” filed on August 17, 2018, by him on behalf of the City of Oklahoma City, which stated: “Simply put, the Plaintiff’s version of the events has changed every time between her interview with Lieutenant Bennett, her initial tort claim, her petition in the instant case, her response to Defendant City’s discovery requests, her deposition, and her response to defendant city’s motion for summary judgement. The Plaintiff should not be allowed to constantly change her version of the events to create a dispute of a material fact...” (p. 3); ● Can testify about the outcome of the Demetria Campbell case, which -- despite the arguments above -- the City of Oklahoma City settled, agreeing to make a payment of \$25,000.
32.	Alexander Sinclair Edwards 1544 NW 123rd PL Oklahoma City, OK 73120-2511	<ul style="list-style-type: none"> ● Former OCPD Officer (2C57 or 2C67, Commission #001587) who worked in Sector 2 adjacent to Defendant Holtzclaw in Sector 1; was on duty the day Plaintiff Ellis alleged she was sexually assaulted (May 8, 2014); matched Plaintiff Ellis’s suspect description; and was arrested on Oct. 14, 2016, fired from OCPD, and pleaded guilty to two felony computer crimes and two misdemeanor counts -- soliciting prostitution and obstructing an officer in the performance of official duties by tipping off the prostitute to an ongoing sting operation; https://oklahoman.com/article/5593965/former-okc-police-lieutenant-admits-giving-prostitute-information-on-sting-operation

		<ul style="list-style-type: none"> • Can testify about how and whether OCPD detectives questioned him about possible contact with Plaintiff Ellis; • Can testify per discovery materials.
33.	Officer Jeff Sellers % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer (2C13, Commission #001367) who did a records check on Plaintiff Morris on April 11, 2014, when he was out at 2200 NE 24th Street; and who was fired by OCPD for having sex with people while on the job (as testified in Chief City's deposition); • Can testify about facts and circumstances surrounding his records check on Plaintiff Morris; • Can testify about whether and how detectives questioned him about his contact with Plaintiff Morris; • Can testify per discovery materials.
34.	Officer Allan Cruz % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer (2C17, #001834) and Defendant Holtzclaw's former co-worker who arrested Plaintiff Lyles in March 2013 when Officer Cruz issued her tickets; was the officer in Case No. 14-015995 on February 26, 2014, involving Plaintiff Lyles where the offense was listed as "MC MJ1, Pos. Marijuana"; was also the officer involved in the traffic stop of Plaintiff Hill on December 20, 2013; • Can testify about facts and circumstances surrounding his stops of Plaintiff Lyles and Plaintiff Hill; • Can testify about whether and how detectives questioned him about his contacts with Plaintiff Lyles and Hill; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
35.	Officer Jeff Dutton % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer (2C13, Commission # 001781) and former co-worker of Defendant Holtzclaw who graduated with him from the police academy; • Can testify about whether and how detectives questioned him about interactions with Plaintiff Morris given that she selected him as a possible assailant in the photo line-up that she was shown by Det. Higginbottom on June 24, 2014; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.

36.	Officer R. Jones % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer (Commission # 001796) and co-worker of Defendant Holtzclaw; ● Can testify about the facts and circumstances surrounding his contact with Plaintiff Morris on June 30, 2013, at 1125 NE 20th Street in OKC, when he completed a field interview card; the facts and circumstances of his running Florene Mathis' name through CIU on December 3, 2013; and the facts and circumstances of his contact with Plaintiff Lyles on January 7, 2014, when he completed a field interview card; ● Can testify about whether and how detectives questioned him about his interactions with Plaintiffs.
37.	Officer Don Majors % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer (Commission # 001699); ● Will testify about the facts and circumstances surrounding his contact with Plaintiff Lignons during a traffic stop on January 26, 2015, when he stopped her for Illegal Tag Display (Case Number 15-007348); will further testify that he refused to transport her to jail after seeing that Lignons was listed as an alleged victim in the Holtzclaw case.
38.	Police Chief Allen Lane Spencer Police Department 8300 NE 36th St. Spencer, OK 73084	<ul style="list-style-type: none"> ● Police Chief of Spencer Police Department; ● Can testify per Spencer Police reports that Plaintiff Lignons was pulled over by a member of the Spencer Police Department on July 4, 2020, a little after 9 pm, for running a stop sign and going 58 MPH in a 35 MPH zone; when the officer asked for her driver's license, she stated falsely that she had one but didn't have it on her; she also claimed the vehicle was insured, but that she did not have the insurance verification on her either; when the officer looked up her records, he realized Plaintiff Lignons had not had a valid driver's license in almost 40 years; additionally, the license plate on the Honda she was driving was registered to a different car and owner; ● Can testify that on July 4th, 2020, Plaintiff Lignons was arrested, the car was impounded, and she was booked into the Oklahoma County Jail, where she remained for two days until she was released when her tickets (totalling \$1,080) were paid.

39.	Officer D. Leshner % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer (Commission #001896) who reported that Plaintiff Gardner was a suspect in a domestic violence incident against her mother, Amanda Gates, on the morning of June 17, 2014, when Ms. Gates said her daughter, Plaintiff Gardner, was on foot walking, refused to get into the car, started screaming, and then punched Ms. Gates 4 to 5 times in the face and arms; ● Can testify about the facts and circumstances surrounding his June 17, 2014, police report about the runaway juvenile, Plaintiff Gardner, and the assault and battery ticket against Plaintiff Gardner signed by Ms. Gates, also witnessed by Sgt. Blumenthal.
40.	Amanda Suzanne Gates 1729 NW 14th St Oklahoma City, OK 73106-2013	<ul style="list-style-type: none"> ● Mother of Plaintiff Gardner; ● Can testify per discovery materials about the facts and circumstances surrounding her complaint to police on the morning of June 17, 2014, reporting Plaintiff Gardner as a runaway, and reporting that Plaintiff Gardner had hit Ms. Gates 4 to 5 times in the face and arms; ● Can testify per discovery materials that after she was contacted by OCPD detectives, she told them that late on the evening after reporting her daughter to police for running away and for disturbing the peace, Ms. Gates returned home and Plaintiff Gardner told her she had met “this really hot cop” and expressed that she wanted to go out on dates with him; ● Can testify per discovery materials that the officer - - Defendant Holtzclaw -- called Amanda Gates later on the evening of June 17, 2014, notifying her that he was an officer and was calling concerning Adaira [Plaintiff Gardner], at which point Ms. Gates cussed him out on the phone and hung up on the officer without giving him a chance to explain the reason for his call; ● Can testify per the trial testimony that she denied telling Det. Davis that Plaintiff Gardner had referred to the officer as a “hot cop,” even when the audio recording of the phone call was played back during the trial; ● Can testify per discovery material.
41.	Melodie Sherne Coleman	<ul style="list-style-type: none"> ● Plaintiff Gardner’s former friend, known as

	<p>3020 N. Vermont Ave. Oklahoma City, OK 73107-1222</p> <p><u>or</u></p> <p>3816 NW 29th Street, Oklahoma City, OK 73107</p>	<p>“Chocolate,” who was stopped with Plaintiff Gardner and Nathaniel Davis by Defendant Holtzclaw on June 17, 2014 around 7 p.m.;</p> <ul style="list-style-type: none"> ● Can testify pursuant to the police report on October 27, 2014, that Ms. Coleman told detectives she was with Adaira [Plaintiff Gardner] and “Face” when they were stopped by the officer; ● Can testify pursuant to the police report on October 27, 2014, that she told detectives Plaintiff Gardner uses ICE, she has seen Adaira [Plaintiff Gardner] shoot up ICE, Plaintiff Gardner prostitutes for drug money, and Plaintiff Gardner lied to the officer when saying “Face” was trying to get Ms. Coleman and Ms. Gardner to prostitute themselves; ● Can testify about facts and circumstances surrounding Defendant Holtzclaw’s stop of Plaintiff Garner, Ms. Coleman, and Nathaniel Davis.
42.	<p>Nathaniel John Davis 1219 NE 18th St. Apt. A Oklahoma City, OK 73111-1011</p>	<ul style="list-style-type: none"> ● Plaintiff Gardner’s acquaintance, known as “Face,” who was stopped with her and Melodie Coleman by Defendant Holtzclaw on June 17, 2014, around 7 p.m.; ● Can testify about facts and circumstances surrounding Defendant Holtzclaw’s stop of Plaintiff Garner, Ms. Coleman, and Nathaniel Davis.
43.	<p>Phillip Leon, MD Laureate Psychiatric Clinic and Hospital 6655 S. Yale Ave. Tulsa, OK 74136</p>	<ul style="list-style-type: none"> ● Psychiatrist who saw Plaintiff Gardner on July 9, 2014, at Shadow Mountain Behavioral Health System, 6262 South Sheridan Road, Tulsa, Oklahoma 74133, and performed a psychiatric evaluation due to her mental health challenges caused by bipolar disorder; ● Can testify per Plaintiff Gardner’s psychiatric evaluation medical records from July 9, 2014, in the discovery materials, that she had not received her injections of an Invega Sustenna, for over 8 months, and she was misusing the prescription drug Adipex; the psychiatrist’s notes also stated that “the patient requires 24-hour medical supervision at the residential level of care; any lesser level of care could result in the patient becoming a danger to self and/or others”; ● Can testify about the mental health illnesses and symptoms for which Invega Sustenna and similar

		<p>mental health drugs are prescribed, and the mental health impacts of misusing prescription Adipex (phentermine);</p> <ul style="list-style-type: none"> • Can testify about the contents of Plaintiff Gardner's psychiatric evaluations at Shadow Mountain Behavioral Health System.
44.	Sgt. Ashley Zeckser % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD sergeant (Commission #001539) who was called to the December 20, 2013, stop of Plaintiff Hill by Defendant Holtzclaw and Officer Cruz; and who arrested Plaintiff Gardner on June 9, 2015, for assault with a deadly weapon (a machete); • Can testify per her police reports and the probable cause affidavit she wrote and signed June 11, 2015, regarding the machete incident.
45.	Officer Robert Wright % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer (Commission #001558) who interviewed Plaintiff Gardner and her mother, Amanda Gates, after Plaintiff Gardner was arrested on June 9, 2015, for assault with a deadly weapon; • Can testify per police reports about the incident.
46.	Officer Greg Salyers % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer who was kicked in the groin by Plaintiff Gardner while he attempted to execute an emergency order of detention, leading to her arrest on October 4, 2018; • Can testify about the facts and circumstances surrounding the arrest of Plaintiff Gardner on October 4, 2018, for assault and battery of an officer.
47.	Officer Jeff McNeil Midwest City Police Dept. 100 N Midwest Boulevard Midwest City, OK 73110	<ul style="list-style-type: none"> • Midwest City police officer who arrested Plaintiff Gardner on October 4, 2018, for kicking OCPD officer Salyers in the groin while he attempted to execute an emergency order of detention; • Can testify about the facts and circumstances surrounding the arrest of Plaintiff Gardner on October 4, 2018, for felony assault and battery of an officer.
48.	Sharon Merriman 202 W. Rickenbacker Dr. Midwest City, OK 73110	<ul style="list-style-type: none"> • Employee who worked at the front desk of AllianceHealth Midwest, 2825 Parklawn Dr., Midwest City, OK 73110, and witnessed the incident where Plaintiff Gardner kicked OCPD Officer Salyers in the groin on October 4, 2018; • Can testify per the Probable Cause statement by

		Midwest City Officer Jeff McNeil Affidavit that “Merriman said that Gardner was acting out of control and was handcuffed prior to being transported. Merriman said Gardner kicked Officer Salyers in the groin area making him fold over and almost falling to the ground.”
49.	Officer Eddy Blosser % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer (Commission # 001334) involved in the arrest on October 23, 2018, of Plaintiff Gardner for assaulting an individual with a windchime; ● Can testify about the probable cause affidavit for the October 23, 2018, arrest of Plaintiff Gardner.
50.	Officer Tannya Benitez 319 E. Dallas St Mt. Vernon, MO 65712	<ul style="list-style-type: none"> ● Patrol officer with the Mt. Vernon Police Department in Missouri who arrested Plaintiff Gardner on February 27, 2020, for Terroristic Threats, Resisting Arrest, and Property Damage 1st Degree; ● Can testify per Mt. Vernon Police Department report and Probable Cause affidavit for the Feb. 27, 2020, arrest of Plaintiff Gardner, who was reported to have introduced herself as “Medusa, Goddess of death” to the officer; walked naked around the Lawrence County Courthouse and taken a bath in the sink; screamed profanities and shouted at Sonic Kitchen staff that she was going to kill them after she became upset that extra condiments would cost extra; and entered a motel’s open room she had previously vandalized, and started taking a shower in the bathroom, where she resisted arrest by the officer, screamed profanities, and punched the bathroom mirror, causing it to shatter.
51.	Willie Earl Carter 721 NE 29th St. Oklahoma City, OK 73105-7827	<ul style="list-style-type: none"> ● Friend of Plaintiff Grate and resident of the house at 633 Culbertson, Oklahoma City, 73105, in which Ms. Gates alleges she was sexually assaulted by Defendant Holtzclaw on April 24, 2014; ● Can testify per discovery materials; ● Can testify about his view of Plaintiff Gates that “She’s slick. She’s a criminal. She’s a schemer and con woman. She played her last trick,” which he is reported as saying in his interview with KFOR News for an August 28, 2014, article about her arrest on August 26, 2014, leading to Oklahoma County court case No. CM-2014-2946 for

		<p>obstructing an officer, possessing drug paraphernalia, and attempting on to avoid a traffic ticket by making a false 911 call about a shooting that never occurred (Oklahoma News 4 (August 28, 2014) <i>Hoping to escape traffic ticket, OKC woman calls 911 to report shooting</i>, https://kfor.com/news/okc-woman-allegedly-calls-911-to-report-shooting-to-try-and-escape-traffic-ticket/).</p>
52.	MSgt. Gary Knight % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD Officer who spoke to media on or about August 28, 2014, about Plaintiff Grate's false 911 call about a shooting at her home as an attempt to get out of a traffic stop; ● Can testify about the facts and circumstances surrounding the incident and his public statement to KFOR News news media: "She called 911 to report a shooting at a nearby location but there wasn't a shooting. It was a false call in order to get the officer off the traffic stop so he would go to the shooting call" (Oklahoma News 4 (August 28, 2014) <i>Hoping to escape traffic ticket, OKC woman calls 911 to report shooting</i>).
53.	Officer Bradley Pemberton % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD Officer (Commission #002119) who arrested Plaintiff Grate for an incident involving resisting arrest, attempted robbery and assault of two victims, one of whom Plaintiff Grate allegedly tried to strangle with her seatbelts in the victims' van on Nov. 1, 2018 (by Austin Prickett (Nov. 1, 2018) <i>Police: Woman arrested after jumping into vehicle to assault and rob individuals</i>, Fox 25 https://okcfox.com/news/local/police-woman-arrested-after-jumping-into-vehicle-to-assault-and-rob-individuals); ● Can testify about the facts and circumstances surrounding Plaintiff Grate's arrest on Nov. 1, 2018.
54.	Police Chief Wade Gourley % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD Chief of Police; ● Can testify per police reports and court records that in the early morning hours of June 25, 2020, Plaintiff Grate, 43, and another female were at the 7-11 in the 3200 block of N. Classen Blvd., where both of the women violently attacked a man, striking him repeatedly in the face with a glass

		<p>object, then allegedly stole the man's car and drove off; when police arrived at the 7-11, the officers described the male victim as "bleeding badly" and "appeared to have a broken nose"; police located the stolen car at a Family Dollar; inside the car, one of the females was described as "passed out; the other was taken into custody inside the store with the keys to the stolen vehicle on her; Plaintiff Grate was arrested and booked into jail on criminal complaints of felony robbery by two or more persons, assault and battery with a dangerous weapon, and larceny and unauthorized use of a motor vehicle; and although her bond was set at \$150,000, she was released from jail 24 hours later when the Oklahoma County DA's office declined to file the criminal charges police arrested her for;</p> <ul style="list-style-type: none"> ● Can testify per discovery materials and about OCPD procedures for retaining e-mails; releasing of personnel records; and responding to complaints that a former OCPD DNA lab analyst -- Ms. Taylor -- reached faulty conclusions and made false statements to a jury.
55.	Terry Wayne Williams 609 N. 5th St. Frederick, OK 73542-2826	<ul style="list-style-type: none"> ● Former boyfriend of Plaintiff Barnes; ● Can testify per discovery materials.
56.	Angela Cooper 7566 NW 10th St. Apt. 2 Oklahoma City, OK 73127-4466	<ul style="list-style-type: none"> ● Acquaintance of Plaintiff Barnes who was driving her on the date of the first alleged offense; ● Can testify per discovery materials.
57.	Leonard Paul Cribbs 908 NE 31st St. Oklahoma City, OK 73105-7622	<ul style="list-style-type: none"> ● Boyfriend of Plaintiff Bowen at time of alleged sexual assault on May 21, 2014; ● Can testify per discovery materials.
58.	Edwin Smith 114 S. 2nd St. Kingfisher, OK 73750-3314	<ul style="list-style-type: none"> ● Boyfriend of Plaintiff Ellis in 2014; ● Can testify about Plaintiff Ellis' description given to him of alleged sexual assault; ● Can testify about discovery materials.
59.	Shaneice Jana Barksdale 12601 N. Pennsylvania Ave. Apt. 412 Oklahoma City, OK 73120-9450	<ul style="list-style-type: none"> ● Woman who made a false sexual assault report against Defendant Holtzclaw on August 22, 2014, to the Oklahoma Police Department, the day after Defendant Holtzclaw was arrested, after which she pleaded guilty to a misdemeanor charge of Falsely

		<p>Reporting a Crime;</p> <ul style="list-style-type: none"> • Can testify about the facts and circumstances surrounding her false allegation per her signed written statement, her signed apology, and her videotaped confession, describing her reasons for making the entire story up, which were that she had seen Plaintiff Ligon's claims on the news and had concocted the story to "help her out" because "I wanted him to go down" and "I just felt bad for her and I just wanted her to know like she wasn't the only victim, because she was so old. I wanted to do something on her behalf because I felt bad for her. Make her feel like she wasn't the only one" (OCPD police interview with Shaneice Barksdale; and her signed apology); • Can further testify, per her videotaped confession, that after she admitted to making up the allegation August 22, 2014, Det. Rocky Gregory told her that the accusers "didn't come forward, I've had to go find them," and said about Defendant Holtzclaw that "we don't want him."
60.	<p>Shakara Walker 8605 Canyon Trail Dr. Oklahoma City, OK 73135-6271</p>	<ul style="list-style-type: none"> • Made false allegation against Daniel Holtzclaw to the media; • Can testify about her Oklahoma News 9 Interview with Steve Shaw, published publicly on August 22, 2014, in which she made an allegation against Defendant Holtzclaw, stating, "As I was walking to the house, he tried to grab me and make it seem like he was gonna rape me"; the article was then updated with the following: "Update: On Saturday, the Oklahoma City police told News 9 they have been receiving several false complaints against Officer Daniel Holtzclaw. Police believe the information provided by Shakara Walker in this story to be false, because they say Holtzclaw has been on paid administrative leave for the last month." (News 9 (August 22, 2014) <i>Community in OKC Officer's Patrol Area Reacts To His Arrest</i>) https://www.news9.com/story/5e35a3c183eff40362be4c1d/community-in-okc-officers-patrol-area-reacts-to-his-arrest
61.	<p>Steven Lane Shaw 1317 Kelley Pointe Pkwy Edmond, OK 73013-5897</p>	<ul style="list-style-type: none"> • Former Oklahoma News 9 news reporter who interviewed Shakara Walker for an August 22, 2014, public article and video about her allegations;

		<ul style="list-style-type: none"> • Can testify about Shakara Walker’s statements to him in the publicly released video; • Can testify about his statements to the public during news coverage in the August 22, 2014, video about Shakara Walker in which he portrayed Defendant Holtzclaw as guilty and reported that police believed Defendant was guilty, even before his trial, such as when Mr. Shaw said: “Daniel Holtzclaw’s worked out of this precinct for the last three years. Investigators say there could be more victims, and, when you hear what you’re about to hear, there just may be! [...] Regardless of what this guy does for a living, it’s good to get him off the street. Live in Oklahoma City. Steve Shaw, News 9.” (News 9 (August 22, 2014) <i>Community in OKC Officer’s Patrol Area Reacts To His Arrest</i>)
62.	Captain Arthur Gregory % counsel for Defendant City	<ul style="list-style-type: none"> • OCPD Captain and Defendant Holtzclaw’s supervisor; • Will testify regarding his supervision of Defendant Holtzclaw, his testimony regarding the Demetria Campbell case, and his knowledge of Holtzclaw’s behavior towards females.
63.	Alan Salmon c/o Oklahoma State Bureau of Investigation (“OSBI”) 6600 N. Harvey Pl. Oklahoma City, OK 73116	<ul style="list-style-type: none"> • OSBI technical analyst; • Will testify regarding his attempt to enhance the Ligons' surveillance video and interactions with OCPD and the District Attorney's office regarding any and all video analyzed by OSBI.
64.	Donald G. Brewer % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD Sgt. and whistleblower who exposed corruption in the internal investigation of his alleged domestic abuse case, was acquitted at trial, and is in the midst of his own civil suit against the department, in which several of his depositions overlap with parties involved in Defendant Holtzclaw’s case; • Can testify about his direct knowledge of OCPD policies and procedures, investigative bias, District Attorney David Prater's practice of coordination and conspiracy with investigators and supervisors, and his knowledge of retaliatory measures taken against officers.
65.	Officer Charles McMacken % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant who also patrolled in the Springlake Division;

		<ul style="list-style-type: none"> • Can testify about his observations of Defendant Holtzclaw's character and work while he was a police officer.
66.	Lt. Mike Roof % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker who was Defendant Holtzclaw's field training officer (FTO); • Can testify that officers, including Defendant Holtzclaw, are trained to utilize every technology available to them to do their job, such as running Varuna checks of individuals' backgrounds.
67.	OCPD Officer D. Boyett % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer, former co-worker of Defendant Holtzclaw, and was present at 1530 NE 15th on February 27, 2014, with the Defendant during the stop of Plaintiff Barnes; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
68.	Officer Ivan Venegas % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant Holtzclaw, present with the Defendant at the 1530 NE 15th, February 27, 2014, stop of Plaintiff Barnes; • Can testify about the facts and circumstances surrounding the stop at 1530 NE 15th on February 27, 2014; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
69.	Jason Angel 8905 N. 155 E. Avenue Owasso, OK 74055	<ul style="list-style-type: none"> • Police Officer with the Tulsa Police Department; • Will testify about the realities of police work and tactics, such as how and why backhand pat-searches are conducted; when and why a male officer may pat-search a female; the nature of proactive policing to look for intel to prevent crimes and catch larger criminals; the importance to officers of using computer databases to run individuals they stop to learn about their backgrounds; the use of officer discretion when deciding not to make arrests for city warrants; the reasons for overlooking minor infractions to achieve bigger police priorities; the reality of false complaints against officers; and policies or standard procedures that officers may sometimes not follow, and why; • Can analyze Defendant Holtzclaw's case and OCPD's investigation from his perspective as a

		police officer.
70.	Dave Ruthenberg 2049 Lantern Lane Enid, OK 73703	<ul style="list-style-type: none"> • Friend of Defendant Holtzclaw; • Will testify as a character witness for Defendant Holtzclaw.
71.	Dustin Green 12501 SW 6 th Street Yukon, OK 73099	<ul style="list-style-type: none"> • Friend of Defendant Holtzclaw from grade school through high school who has kept in contact through college and the Defendant's time at the police department; • Will testify as a character witness for Defendant Holtzclaw.
72.	Discovery is ongoing. Defendant reserves the right to supplement this list.	

WITNESSES DEFENDANT HOLTZCLAW MAY CALL

No.	Witness	Summary of Anticipated Testimony
1.	Diane Harris % Plaintiff Ligons' counsel of record.	<ul style="list-style-type: none"> • Friend of Plaintiff Jannie Ligons; • Can testify per discovery materials about smoking marijuana with Jannie Ligons at McCurtis Cole's home on June 17-18, 2014, and facts and circumstances surrounding Plaintiff Ligons' frequency of drug use and actions prior to her traffic stop by Defendant Holtzclaw on June 17-18, 2014.
2.	Attorney Tony Coleman % Plaintiffs' counsel or at: 101 Park Avenue Suite 300 Oklahoma City, Oklahoma 73102	<ul style="list-style-type: none"> • Former attorney of Plaintiff Bowen; • Can testify about whether he was fired by Ms. Bowen the day he testified in Defendant Holtzclaw's criminal trial and prior to her testimony (as she testified at trial), or if he had never been her attorney in the past (as she testified on Trial Transcript page 3393), or if she fired him over the phone about a week prior to testifying (as she testified on Trial Transcript page 3397).
3.	Officer Jeff Yust % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD Police Officer (Commission # 001093) who stopped Plaintiff Raines on 10/25/13 for a driving violation; • Can testify about the facts and circumstances of that police stop of Plaintiff Raines.

4.	Officer A. Rogers % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD Officer (Commission # 01687) involved in the case (Case No. 14-054943) in which Florene Mathis aka Lynn Gibson was arrested for the charge of Assault and Battery with a Dangerous Weapon in July 2014, for which she was incarcerated at the time Detective Davis approached her about Defendant Holtzclaw; ● Can testify about facts and circumstances of the July 8, 2014, arrest of Florene Mathis.
5.	Officer Daniel Dominguez % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD Officer (2C48, Commission # 000946) who arrested Florene Mathis on 05/30/14 (Case Number 14-043587) for Assault and Battery; ● Can testify about facts and circumstances of the 5/30/14 arrest of Florene Mathis.
6.	Dana Grace Franklin OKC Artists for Justice Foundation 4415 N. Kelley Ave. Oklahoma City, OK 73111	<ul style="list-style-type: none"> ● OKC Artists for Justice co-founder who helped organize vocal protests, including outside the courthouse, that interrupted Defendant Holtzclaw's trial in November-December 2015; ● Can testify about how protesters coordinated their chanting of "We want life" that was heard in the courtroom during Defendant Holtzclaw's trial, as described in a news article on Nov. 17, 2014: "A group of about 100 men and women stood outside the Oklahoma County courthouse Tuesday morning in protest of the former officer, Daniel Ken Holtzclaw, who grew up in Enid. He is on trial for allegedly sexually abusing 13 black women while he was a police officer. The chant was in reference to Holtzclaw's possible prison sentence. Grace Franklin, a founder of OKC Artists for Justice, led one chant about 10:30 a.m. [...] The protesters loudly repeated what she chanted. Whenever Franklin yelled, '36 counts,' the group shouted, 'We want life!'" (Kyle Schwab (Nov. 17, 2015, Tuesday) <i>Protesters disrupt testimony at Holtzclaw trial</i>. The Oklahoman. Enidnews.com. https://www.enidnews.com/news/state/protesters-disrupt-testimony-at-holtzclaw-trial/article_95214ece-e8f6-5890-9874-9ec47704541c.html); ● Can testify about her knowledge of how protesters' chanting was coordinated with certain testimony during the Holtzclaw trial;

		<ul style="list-style-type: none"> • Can testify about her knowledge of the allegations against Defendant Holtzclaw and the methods used to obtain them, as well as her views on whether those methods served justice, such as OCPD police detectives' method of soliciting most of the allegations specifically from African-American women with criminal histories, according to trial testimony; • Can testify about whether she was aware of contradictions in accusers' allegations, such as Plaintiff Ellis's description to Detective Davis of the suspect as a black officer shorter than Plaintiff's own height of 5'11" and with a skin tone darker than her own.
7.	Steven Scott Vassar 11224 Dover Ct. Yukon, OK 73099-8049	<ul style="list-style-type: none"> • Retired OCPD employee who did computer forensics and security video retrieval, and worked with Det. Kim Davis on many occasions. • Can testify about his observations of Det. Davis' questionable decisions in cases.
8.	Cortland Devon Selman 209 Helene Ave. Royal Oak, MI 48067-3978	<ul style="list-style-type: none"> • Friend of Defendant Holtzclaw who played football with him in college; • Can testify as character witness if Defendant Holtzclaw's character is put at issue.
9.	Officer Daniel Kleehammer % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant Holtzclaw. • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
10.	Sergeant Burton % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
11.	Sergeant Grimes % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD sergeant on gang unit and former co-worker of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
12.	Officer Frank % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
13.	Lieutenant Steiner	<ul style="list-style-type: none"> • OCPD lieutenant and former co-worker of

	% Counsel for Defendant City	<p>Defendant Holtzclaw;</p> <ul style="list-style-type: none"> • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
14.	Sergeant Sharp (retired) % Counsel for Defendant City	<ul style="list-style-type: none"> • Retired OCPD sergeant and former co-worker of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
15.	Sergeant Nelson % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant Holtzclaw and FOP representative; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
16.	Officer Ortiz % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
17.	Sergeant Pitts % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD sergeant and former co-worker of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
18.	Officer Malley % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer, former co-worker of Defendant Holtzclaw, and present at 1530 NE 15th on 2-27-14 with the Defendant during the stop of Plaintiff Barnes. • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
19.	Officer Wilkey % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD officer who investigated the break-in at 1530 NE 15th, speaking with Plaintiff Barnes on 2-28-14, during which conversation she never disclosed any improper conduct towards her by Defendant Holtzclaw; • Can testify about facts and circumstances surrounding his investigation of the break-in at 1530 NE 15th, and his subsequent conversation with Plaintiff Barnes on 2-28-14.
20.	Sergeant Coffey % Counsel for Defendant City	<ul style="list-style-type: none"> • OCPD sergeant and former co-worker and field training officer of Defendant Holtzclaw; • Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
21.	Officer White	<ul style="list-style-type: none"> • OCPD officer and former co-worker of Defendant

	% Counsel for Defendant City	Holtzclaw; <ul style="list-style-type: none"> ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
22.	Officer Tyson % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer and former co-worker of Defendant Holtzclaw; ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
23.	Officer Tabaii % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer and former co-worker of Defendant Holtzclaw; ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
24.	Sergeant Hynd % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD sergeant and former co-worker of Defendant Holtzclaw; ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
25.	Sergeant Cadena % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD sergeant and former co-worker of Defendant Holtzclaw; ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
26.	Lieutenant Harden % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD lieutenant and former co-worker of Defendant Holtzclaw; ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
27.	Officer Reimche % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer and former co-worker of Defendant Holtzclaw. ● Can testify about his observations of Defendant Holtzclaw's work while he was a police officer.
28.	Officer Kyle Maly % Counsel for Defendant City	<ul style="list-style-type: none"> ● OCPD officer (Commission #001752) who detained Plaintiff Morris on June 3, 2014; ● Can testify about facts and circumstances surrounding the detention, including that he was contacted by an informant assisting OCPD in locating Plaintiff Morris, leading to Officer Maly's detaining Plaintiff Morris so that Det. Gregory could question her at that location; Officer Maly reported to Det. Gregory that Ms. Morris had been hitting her head on the cage and wanted to leave; Ms. Morris was crying and kept saying she wanted to let it go, and advised that she did not want to pursue this matter any further and would not

		cooperate in the investigation of the officer.
29.	Kelly Collins c/o Oklahoma County District Attorney's Office	May testify concerning the timeline and nature of sexual assaults committed by former District Judge Timothy Henderson, who presided over the criminal trial and ex parte hearings involving Holtzclaw. May testify as to other communications regarding the actions of Judge Henderson in the Holtzclaw criminal case.
30.	Carson Turner c/o Oklahoma County District Attorney's Office	May testify concerning the timeline and nature of sexual assaults committed by former District Judge Timothy Henderson, who presided over the criminal trial and ex parte hearings involving Holtzclaw. May testify as to other communications regarding the actions of Judge Henderson in the Holtzclaw criminal case.
31.	Deputy Chief Jason Clifton c/o/ Oklahoma City Police Department	May testify to OCPD policy of not burning evidence kits in contrast to the deposition of Elaine Taylor; may testify per reports regarding the description of the suspect provided by Plaintiff Ligons.
32.	Any witnesses listed by any of the Defendants.	
33.	Any witnesses listed by any of the Plaintiffs.	
34.	All witnesses needed for impeachment or rebuttal purposes.	
35.	All witnesses needed for authentication of exhibits.	
36.	Discovery is ongoing. Defendant Holtzclaw reserves the right to supplement this list.	

DATED this 16th day of August, 2021,

Respectfully submitted,

/s/ James L. Hankins, OBA# 15506
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Counsel for Defendant Daniel Holtzclaw

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of August, 2021, I electronically transmitted the attached Witness List to the Clerk of this Court using the ECF System for filing. Based on the records currently in the file, the Clerk of the Court will transmit a Notice of Electronic Filing to the registered counsel.

/s/ James L. Hankins