

# Exhibit 18



**MASTER DOCKET CASE NO. 19-CV-01717**  
**IN RE: WATTS COORDINATED**  
**PRETRIAL PROCEEDINGS**

**Confidential Portions**

**DEPONENT:**

**DARRYL EDWARDS**

**DATE:**

**October 28, 2021**



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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF  
3                   ILLINOIS EASTERN DIVISION  
4                   MASTER DOCKET CASE NO. 19-CV-01717  
5                   JUDGE VALDERRAMA  
6                   MAGISTRATE JUDGE SHELIA M. FINNEGAN

7  
8                   IN RE: WATTS COORDINATED  
9                   PRETRIAL PROCEEDINGS

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20                   CONFIDENTIAL PORTIONS

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23    DEPONENT:    DARRYL EDWARDS  
24    DATE:          OCTOBER 28, 2021  
25    REPORTER:     CHLOE HOWARD

<p>1 the arrest for June 18, 2004, correct?</p> <p>2 A Yes.</p> <p>3 Q And if Officer Jones had planted drugs on Mr.</p> <p>4 Carter, you would've been aware of that, right?</p> <p>5 MR. ZECCHIN: Objection. Form and foundation.</p> <p>6 You can answer.</p> <p>7 A No. I've never seen Officer Jones planting</p> <p>8 drugs on anyone.</p> <p>9 Q Okay. And my understanding from looking at</p> <p>10 the reports, was that the reports indicated that you</p> <p>11 were present when Mr. Carter was arrested, right?</p> <p>12 A I'd need to see the reports again, but yes, I</p> <p>13 was the second arresting officer.</p> <p>14 Q Okay. Okay. And if Mr. Jones -- if Officer</p> <p>15 Jones had punched Mr. Carter in jaw, you would've</p> <p>16 observed that, too, correct?</p> <p>17 MR. ZECCHIN: Objection. Form. You can</p> <p>18 answer.</p> <p>19 A If that happened, yes.</p> <p>20 Q Okay. And did you ever see Officer Jones</p> <p>21 punch somebody in the jaw?</p> <p>22 A No.</p> <p>23 Q The last page of this exhibit -- oh, and I'm</p> <p>24 sorry the -- because we're looking at a confidential</p> <p>25 exhibit, this part of the deposition should be marked</p>	Page 18	Page 20
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Confidential

Page 22

1 A I just wanted to clear -- answering your  
 2 question.

3 Q Sure. So meaning that you might have -- you  
 4 might have looked at reports before preparing?

5 A Yeah. You -- do you recall, did you arrest or  
 6 be part of arrest with this individual? And then it  
 7 will show you the whole packet of this complaint, is  
 8 what I'm saying.

9 Q Okay.

10 A I just wanted to make that -- make that clear.

11 Q I appreciate that. Thank you.

12 A Yeah.

13 Q So now that we've looked at these documents  
 14 about the arrest of William Carter on June 18, 2004,  
 15 have you recalled anything about that cross the re --  
 16 about that arrest?

17 A No.

18 Q And are you aware of anything that -- other  
 19 than what we've looked at, that might help you refresh  
 20 your recollection?

21 (END CONFIDENTIAL PORTION IV)

22

23

24

25

Page 23

1 CERTIFICATE OF REPORTER

2 COMMONWEALTH OF KENTUCKY AT LARGE

3

4 I do hereby certify that the witness in the foregoing  
 5 transcript was taken on the date, and at the time and  
 6 place set out on the Stipulation page hereof, by me  
 7 after first being duly sworn to testify the truth, the  
 8 whole truth, and nothing but the truth; and that the  
 9 said matter was recorded by me and then reduced to  
 10 typewritten form under my direction, and constitutes a  
 11 true record of the transcript as taken, all to the best  
 12 of my skill and ability. I certify that I am not a  
 13 relative or employee of either counsel and that I am in  
 14 no way interested financially, directly or indirectly,  
 15 in this action.

16

17

18

19  
 20 *Chloe Howard*

21

22 CHLOE HOWARD

23 COURT REPORTER/NOTARY

24 MY COMMISSION EXPIRES: 12/11/2024

25 SUBMITTED ON: 11/10/2021