

Exhibit 19



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Transcript of Gerome Summers Jr., Volume II

Date: February 13, 2020
Case: Watts Coordinated Cases

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February 13, 2020

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1	IN THE UNITED STATES DISTRICT COURT	1	A P P E A R A N C E S
2	FOR THE NORTHERN DISTRICT OF	2	ON BEHALF OF CERTAIN PLAINTIFFS:
3	ILLINOIS EASTERN DIVISION	3	SCOTT R. RAUSCHER, ESQUIRE
4	-----x	4	LOEY & LOEY
5	In re: WATTS COORDINATED : Master Docket	5	311 North Aberdeen Street, Third Floor
6	PRETRIAL PROCEEDINGS : Case No. 19-cv-01717	6	Chicago, Illinois 60607
7	-----x	7	(312) 243-5900
8		8	
9		9	ON BEHALF OF CERTAIN PLAINTIFFS:
10	Deposition of Gerome Summers Jr., Volume 2	10	JOEL FLAXMAN, ESQUIRE
11	Chicago, Illinois	11	KENNETH N. FLAXMAN, PC
12	Thursday, February 13, 2020	12	200 South Michigan Avenue, Suite 201
13	10:07 a.m.	13	Chicago, Illinois 60604
14		14	(312) 427-3200
15		15	
16		16	ON BEHALF OF DEFENDANT RONALD WATTS:
17		17	AHMED A. KOSOKO, ESQUIRE
18		18	JOHNSON & BELL LTD.
19		19	33 West Monroe Street, Suite 2700
20		20	Chicago, Illinois 60603
21		21	(312) 372-0770
22	Job No. 274040	22	
23	Pages: 241-491	23	
24	Transcribed by: Megan Wunsch, AAERT CET	24	APPEARANCES CONTINUED ON FOLLOWING PAGE
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1	Deposition of Gerome Summers Jr., held at the	1	A P P E A R A N C E S C O N T I N U E D
2	offices of:	2	ON BEHALF OF DEFENDANT KALLATT MOHAMMED:
3		3	LAURA S. PLATT, ESQUIRE
4	Loevy & Loevy	4	DALEY MOHAN GROBLE PC
5	311 North Aberdeen Street, 3rd Floor	5	55 West Monroe, Suite 1600
6	Chicago, Illinois 60607	6	Chicago, Illinois 60603
7	(312) 243-5900	7	(312) 422-9999
8		8	
9	Pursuant to agreement, before Ryan Grzelak,	9	ON BEHALF OF DEFENDANTS ALVIN JONES, ROBERT
10	Notary Public in and for the State of Illinois.	10	GONZALEZ, MIGUEL CABRALES, DOUGLAS NICHOLS
11		11	JR., MANUEL S. LEANO, BRIAN BOLTON, KENNETH
12		12	YOUNG JR., DAVID SOLTIS, ELSWORTH J. SMITH
13		13	JR., JOHN RODRIGUEZ, GEROME SUMMERS, JR.,
14		14	CALVIN RIDGELL JR., LAMONICA LEWIS, REBECCA
15		15	BOGARD, FRANKIE LANE, and KATHERINE
16		16	MOSES-HUGHES, DARRYL EDWARDS:
17		17	ALLYSON L. WEST, ESQUIRE
18		18	HALE & MONICO, LLC
19		19	The Monadnock building
20		20	53 West Jackson Boulevard, Suite 337
21		21	Chicago, Illinois 60604
22		22	(312) 500-2951
23		23	
24		24	APPEARANCES CONTINUED ON FOLLOWING PAGE

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1 I just don't recall.		1 prepare for today's deposition?	
2 Q Okay. I'm going to ask you about the		2 A Yes.	
3 arrest of William Carter on June 18th, 2004. Do		3 Q And having reviewed it, does it help you	
4 you have any recollection about the arrest of		4 remember this arrest?	
5 William Carter on June 18th, 2004?		5 A It doesn't.	
6 A I don't.		6 Q You're listed in -- well, which box number	
7 Q Okay. Did you look at any documents about		7 are you listed in?	
8 that arrest?		8 A I'm on the line with 18.	
9 A Yes.		9 Q Okay. And what do you take the listing of	
10 Q Okay. And those didn't refresh your		10 your name there to mean?	
11 recollection?		11 A Under where it's checked witness.	
12 A They didn't.		12 Q So you're listed as a witness?	
13 Q Okay. Did you look at an arrest report?		13 A It says witness, so I witnessed something.	
14 A If -- let me look at it and see if I did.		14 Q Okay. So the -- it was your practice to	
15 I believe I did.		15 list somebody as a witness on a vice case report	
16 THE WITNESS: Thank you.		16 if they had witnessed something about the	
17 MR. FLAXMAN: And I'm sorry. Are we at		17 incident; is that right?	
18 28?		18 A Yes.	
19 MALE SPEAKER: Yeah.		19 Q But based on reviewing the report and	
20 (Exhibit 28 was marked for identification		20 based on your own recollection, you don't know	
21 and is attached to the transcript.)		21 what exactly you witnessed about this incident; is	
22 THE WITNESS: Okay. Yeah, I did -- I did		22 that right?	
23 look over this, but it didn't refresh my memory at		23 A I do not know, and I -- you know, I don't	
24 all.		24 remember, no.	
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1 Q Okay. You did review Exhibit 28?		1 Q And the -- did you take a look at the	
2 A Yes.		2 narrative of this report?	
3 Q Okay. And you recognize that to be the		3 A I did.	
4 arrest report for William Carter on June 18th,		4 Q Okay. And a few times it lists statements	
5 2004?		5 about reporting officers; right?	
6 A Yes.		6 A Correct.	
7 Q Okay. But you're not one of the -- you're		7 Q Would you be included in -- is it possible	
8 not the first or second arresting officer on this		8 that you were included in one of those groups of	
9 report; right?		9 ROs?	
10 A No.		10 MS. WEST: Objection. Foundation.	
11 MR. FLAXMAN: Let's mark this next one.		11 A It is -- I don't remember, but it's both	
12 MS. WEST: Thank you.		12 possible and not possible because reporting	
13 MR. FLAXMAN: This is Exhibit 29.		13 officers could refer to just officers Al Jones and	
14 (Exhibit 29 was marked for identification		14 Darryl Edwards.	
15 and is attached to the transcript.)		15 Q Could it also refer to other officers?	
16 Q Do you recognize Exhibit 29 to be a vice		16 A It --	
17 case report for the arrest of William Carter and		17 MR. MICHALIK: Objection to foundation and	
18 two other people on June 18th, 2004?		18 form.	
19 A Yes. One second.		19 A It could.	
20 Q Oh, please.		20 Q This vice case report, in addition to	
21 A Okay. Yes, I -- yes, I do -- I recognize.		21 Mr. Carter, also lists J-A-M-O-N -- I'll say Jamon	
22 Q Okay.		22 -- Walker as the second offender. Do you see	
23 A I see it.		23 that?	
24 Q And is this a document you reviewed to		24 A I see that.	