

EXHIBIT B

Curtis Lamond Oats, Sr.
February 15, 2024

		Page 3
1	I N D E X	
2	WITNESS:	PAGE
3	CURTIS LAMOND OATS, SR.	
4	EXAMINATION BY MR. OWENS	4
5	EXAMINATION BY MR. FLAXMAN	87
6	FURTHER EXAMINATION BY MR. OWENS	93
7		
8		
9		
10		
11		
12	E X H I B I T S	
13	Number	For Identification
14	Oats Deposition Exhibit 1	8
15	Oats Deposition Exhibit 2	45
16	Oats Deposition Exhibit 3	72
17	Oats Deposition Exhibit 4	80
18	Plaintiff's Exhibit 1	90
19		
20		
21		
22		
23		
24		
Page 2		Page 4
1	APPEARANCES:	
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12	MR. TROY OWENS, ASSISTANT STATE'S ATTORNEY	
13	--and--	
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23		
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1 (Pages 1 to 4)

Curtis Lamond Oats, Sr.
February 15, 2024

Page 5	Page 7
<p>1 Illinois.</p> <p>2 Q. Is that a single family house or an 3 apartment?</p> <p>4 A. It's a single family house.</p> <p>5 Q. How long did you live there?</p> <p>6 A. 13, almost 14 years.</p> <p>7 Q. I'll direct your attention to a time frame 8 involving August 18th, 2021. Do you understand?</p> <p>9 A. Yes.</p> <p>10 Q. Where did you live then?</p> <p>11 A. 4816 East Lake Shore Drive, Wonder Lake, 12 Illinois.</p> <p>13 Q. That's the address you just told me about, 14 true?</p> <p>15 A. Yes.</p> <p>16 Q. In the last 10 years, have you been -- have 17 you been arrested and prosecuted for any crimes 18 involving dishonesty?</p> <p>19 A. No.</p> <p>20 Q. In the last 10 years, have you been arrested 21 and prosecuted for any offense such as theft, 22 deceptive practice, forgery, or any other felony 23 offense?</p> <p>24 A. No.</p>	<p>1 Q. Did you have a trial?</p> <p>2 A. Yes.</p> <p>3 Q. What year was the trial?</p> <p>4 A. '07 I believe.</p> <p>5 Q. Where was the trial?</p> <p>6 A. Chicago, Illinois.</p> <p>7 Q. Which branch court?</p> <p>8 A. Cook, Cook County at the 26th and California 9 building.</p> <p>10 Q. Did you sue anybody else, any other 11 government entity?</p> <p>12 A. Cook County Sheriff.</p> <p>13 Q. Okay. So let me back up to the City of 14 Chicago Police Department. What was the result of 15 that case?</p> <p>16 A. I was acquitted.</p> <p>17 Q. No, your lawsuit. What happened to that?</p> <p>18 A. The Chicago Police Department settled out of 19 court.</p> <p>20 Q. Okay. And then you sued, you sued the Cook 21 County Sheriff's Department I think you said?</p> <p>22 A. Yes.</p> <p>23 Q. What was the basis of that complaint?</p> <p>24 A. I received diabetic medicine and I was</p>
<p style="text-align: center;">Page 6</p> <p>1 Q. Have you in the -- have you ever sued the 2 government before?</p> <p>3 A. Depends on which branch but yes.</p> <p>4 Q. It sounds like you sued a branch. What 5 branch did you sue, if you did?</p> <p>6 A. Chicago Police Department.</p> <p>7 Q. When was that?</p> <p>8 A. '06 I believe.</p> <p>9 Q. And that was in the Northern District of 10 Illinois?</p> <p>11 A. Yes.</p> <p>12 Q. What was the result -- what can -- can you 13 tell me -- strike that.</p> <p>14 What did you sue them over?</p> <p>15 A. Malicious prosecution and wrongful 16 incarceration.</p> <p>17 Q. Okay. What were you prosecuted for?</p> <p>18 A. If I remember correctly, I believe it was for 19 delivery of a controlled substance.</p> <p>20 Q. Okay. Were you convicted of that offense?</p> <p>21 A. No.</p> <p>22 Q. What was the result of the arrest for 23 delivery of a controlled substance?</p> <p>24 A. It was acquitted.</p>	<p style="text-align: center;">Page 8</p> <p>1 supposed to see certain doctors and whatnot and they 2 didn't give it to me in a timely manner.</p> <p>3 Q. Okay. What was the result of that case, the 4 civil case?</p> <p>5 A. Every -- it was a class action lawsuit and it 6 was awarded to the plaintiffs of the suit.</p> <p>7 Q. Were you one of the class members?</p> <p>8 A. Yes.</p> <p>9 Q. Did you receive a settlement?</p> <p>10 A. I did.</p> <p>11 MR. OWENS: Okay. Can you put the complaint on 12 the board?</p> <p>13 I'm going to call this Exhibit 1. It 14 will be the complaint in this case.</p> <p>15 (Whereupon, Oats Deposition Exhibit No. 1 was marked for identification.)</p> <p>16 BY MR. OWENS:</p> <p>17 Q. I have before you Exhibit 1. Do you know 18 what this is?</p> <p>19 A. It's an amendment to the complaint.</p> <p>20 Q. It's your complaint; is that true?</p> <p>21 A. Yes.</p> <p>22 MR. OWENS: Can you just scroll through real 23 quickly so we can see all of it. Okay. Let me stop</p>

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">Page 9</p> <p>1 there. 2 BY MR. OWENS: 3 Q. As best you recall, that appears to be your 4 complaint that we're here for today, true? 5 A. Yes, sir. 6 Q. Signed by your attorney Kenneth N. Flaxman, 7 true? 8 A. Yes. 9 Q. Mr. Flaxman was the attorney in your other 10 two cases, correct? 11 A. He was. 12 Q. You're here about -- you're the plaintiff in 13 this action that appears in Federal court, true? 14 A. True. 15 Q. It complains about events that occurred as 16 you have alleged on August 18, 2021; is that true? 17 A. Yes. 18 Q. Your involvement in this case began with 19 what event? How did this start? 20 A. I was at home and one of the defendants 21 showed up at my door knocking on the door. I opened 22 the door for him, and he said that there was a 23 complaint about a dog barking. That's how it started. 24 Q. And this was at the Wonder Lake address that</p>	<p style="text-align: center;">Page 11</p> <p>1 THE WITNESS: Okay. 2 BY MR. OWENS: 3 Q. How long -- 4 A. What was the question? 5 Q. How long had Mr. Deloney, Jr., lived at the 6 house with you as of August 2021? 7 A. He had been living with me since his mom 8 passed in 2016. 9 Q. At that time did you have employment? 10 A. I did. 11 Q. What did you do for a living? 12 A. I worked for Uber, and I was also going to 13 school. 14 Q. So that's a ride delivery service, true? 15 A. Yes. 16 Q. How long had you worked for Uber as of 17 August 18th, 2021? 18 A. Since 2016, December. 19 Q. Did you work there full time? 20 A. No, part-time. 21 Q. How many hours a week approximately as of 22 August 2021? 23 A. Maybe 25 hours a week. 24 Q. All right. And did you work in the evening,</p>
<p style="text-align: center;">Page 10</p> <p>1 you've previously described, true? 2 A. Yes. 3 Q. What time of day was this? 4 A. It was morning time. I can't tell you the 5 exact time but it was morning time. 6 Q. Do you think it was before 10 o'clock? 7 A. No, it was after 10 o'clock. 8 Q. Okay. Do you think it was before 9 11 o'clock? 10 A. I'm not sure. I just know it was in between 11 10 and 1. I can't give you no exact time because it's 12 been a while. 13 Q. At that time who did you live at the 14 residence with? 15 A. My son. 16 Q. What's his name? 17 A. His name is Dell Deloney, Jr. 18 Q. Did you say Dell Deloney, Jr.? 19 A. Uh-huh. 20 Q. How long had you lived there? 21 MR. FLAXMAN: Let me just, let me just suggest 22 that you say yes or no rather than uh-huh. It gets 23 real complicated. 24 MR. OWENS: Good point. Thank you, Mr. Flaxman.</p>	<p style="text-align: center;">Page 12</p> <p>1 afternoon, morning, or did it change? 2 A. I worked in the evenings. 3 Q. What time did you start working at that 4 time? 5 A. Unsure. 6 Q. Where did you work, what geographic location 7 did you work when you worked for Uber in 2021? 8 A. McHenry, Cook County, give me one second, 9 Lake County, DuPage County. I worked all over. 10 Q. Okay. Are you married? 11 A. Excuse me? 12 Q. Are you married? 13 A. Widowed. 14 Q. Okay. All right. You referred to his 15 mother passing away. When did -- I'm assuming his 16 mother is your wife, your deceased wife, true? 17 A. Yes. 18 Q. Okay. When did she pass away? 19 A. She passed away December of 2016. 20 Q. Do you have any other children? 21 A. Yes. 22 Q. What other children do you have? 23 A. I have three girls and one other boy. 24 Q. What is the oldest -- what is the age of the</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 13	Page 15
<p>1 youngest and the oldest?</p> <p>2 A. The age of the youngest is 18 in March, and</p> <p>3 the age of the oldest will be 31 come November.</p> <p>4 Q. What are your children's names?</p> <p>5 A. Lashaunda Williams, Alexus Oats, Curtis Oats,</p> <p>6 Sabrina Williams, and Dell Deloney.</p> <p>7 Q. Okay. Who is Monica Cosby?</p> <p>8 A. Monica Cosby is a significant other, an ex.</p> <p>9 Q. By significant other, do you mean</p> <p>10 ex-girlfriend?</p> <p>11 A. Yes.</p> <p>12 Q. When did you have Ms. Cosby as your</p> <p>13 girlfriend before she became your ex?</p> <p>14 A. We had been seeing each other since the early</p> <p>15 '90s. When she returned from prison, we got together</p> <p>16 briefly and I believe that was in 2016 and she left my</p> <p>17 residence or we stopped being together in 2018, January</p> <p>18 I believe. Not really sure on that date but, you know,</p> <p>19 it was a hard time for me.</p> <p>20 Q. Okay. Was there a dog at the house, DJ?</p> <p>21 A. I don't know a DJ.</p> <p>22 Q. Was there a dog at the house in August of</p> <p>23 2021?</p> <p>24 A. Yes.</p>	<p>1 A. He's a Pomeranian.</p> <p>2 Q. Okay. Was the dog vicious?</p> <p>3 A. No.</p> <p>4 Q. Okay. How long had -- what was the dog's</p> <p>5 name by the way?</p> <p>6 A. JD.</p> <p>7 Q. JD, that's right. How long had JD lived at</p> <p>8 the Wonder Lake residence as of August 2021?</p> <p>9 A. He did not live at the residence. He was</p> <p>10 visiting.</p> <p>11 Q. Okay. How long was his visit?</p> <p>12 A. His visit was about maybe two weeks.</p> <p>13 Q. Where was Christina during the two weeks?</p> <p>14 A. She was at her house in Chicago on</p> <p>15 Monitor Avenue.</p> <p>16 Q. Okay. So am I wrong to conclude that during</p> <p>17 the two weeks you were essentially caring for the dog,</p> <p>18 that you had JD in your care?</p> <p>19 A. I, yes, he was at my house visiting.</p> <p>20 Q. After the -- after this case -- on</p> <p>21 August 18, 2021, when do you believe JD ceased living</p> <p>22 with you?</p> <p>23 A. Can you repeat the question? You kind of</p> <p>24 blanked out.</p>
<p style="text-align: center;">Page 14</p> <p>1 Q. What kind of dog?</p> <p>2 A. A vicious Pomeranian.</p> <p>3 Q. Whose -- who owned the dog?</p> <p>4 A. My daughter.</p> <p>5 Q. What is your daughter's name?</p> <p>6 A. Her name is Christina Randall. She's a</p> <p>7 stepdaughter.</p> <p>8 Q. Who is her mother?</p> <p>9 A. Vivian Randall.</p> <p>10 Q. Was she living with you in August of 2021?</p> <p>11 A. She was not. She was living in Chicago.</p> <p>12 Q. Why was her dog at your house in August</p> <p>13 2021?</p> <p>14 A. Because my son has emotional problems so the</p> <p>15 dog would usually come in to smooth those emotional</p> <p>16 problems over. That's Dell because he was going</p> <p>17 through the time of, you know, his mom passing.</p> <p>18 Q. Did you describe the dog earlier as a</p> <p>19 vicious dog?</p> <p>20 A. Oh, vicious Pomeranian, at least that's what</p> <p>21 you guys described him as.</p> <p>22 Q. Okay. We're not talking about how I</p> <p>23 described him, Mr. Lamond -- Mr. Oats. I'm talking</p> <p>24 about how you'd describe him?</p>	<p style="text-align: center;">Page 16</p> <p>1 Q. Sure. If the date that you have complained</p> <p>2 of is August 18, 2021, when did JD cease living with</p> <p>3 you?</p> <p>4 A. Two weeks after that but he would come back</p> <p>5 often.</p> <p>6 Q. How frequently?</p> <p>7 A. I don't know. Maybe once a month.</p> <p>8 Q. How long would he stay?</p> <p>9 A. Anywhere from one to two weeks.</p> <p>10 Q. Was he staying to help with your son?</p> <p>11 A. Yes.</p> <p>12 Q. That was his purpose is to assist with your</p> <p>13 son?</p> <p>14 A. Yes.</p> <p>15 Q. Would Christina come and help with his care?</p> <p>16 A. Sometimes.</p> <p>17 Q. How -- in 2021 approximately how many times</p> <p>18 did JD come to stay with you?</p> <p>19 A. I am not sure to be honest with you. I</p> <p>20 didn't keep records. I didn't keep records.</p> <p>21 Q. More than ten times?</p> <p>22 A. I'm not sure. I didn't keep records.</p> <p>23 Q. More than five times?</p> <p>24 A. Maybe less than five times.</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 17	Page 19
<p>1 Q. Maybe?</p> <p>2 A. Because, like I told you, maybe once a month,</p> <p>3 and if it was in August all the way up into January,</p> <p>4 you know, it couldn't have been more than maybe five if</p> <p>5 that much.</p> <p>6 Q. Five times approximately?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Each time about two weeks, true?</p> <p>9 A. No. Each time it varies.</p> <p>10 Q. Okay. What's the shortest?</p> <p>11 A. The shortest would be three days.</p> <p>12 Q. What's the longest?</p> <p>13 A. The longest would have been two weeks.</p> <p>14 Q. Was it more frequently two weeks or more</p> <p>15 frequently three days?</p> <p>16 A. More frequently three days.</p> <p>17 Q. The dog seemed to be a regular visitor in</p> <p>18 your words, true?</p> <p>19 A. I'm not really sure how to answer that. He</p> <p>20 comes and he helps with my son, yes. Regular visitor,</p> <p>21 I could not answer that honestly because I don't know</p> <p>22 the ramifications of that or what you're implying.</p> <p>23 Q. Well, forget about the ramifications.</p> <p>24 A. Can you explain that a little more in detail</p>	<p>1 did you start driving for Uber?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Was it in the evening?</p> <p>4 A. It was after the gentleman came if that's</p> <p>5 what you're asking because after he left, I literally</p> <p>6 closed my door --</p> <p>7 Q. No. No. I'm talking about -- Mr. Oats, I'm</p> <p>8 talking about the night before.</p> <p>9 A. The night before, I'm not sure because it's</p> <p>10 been a while, and I worked, you know, approximately,</p> <p>11 you know, many times. Usually I can give you a time</p> <p>12 frame of I'll start maybe 3 and then end about 12 or</p> <p>13 I'll start at 8 and end about 5 in the morning. It</p> <p>14 depends on, you know, the particular day and how tired</p> <p>15 I am.</p> <p>16 Q. All right. You said -- I think you told me</p> <p>17 that you think you may have been sleeping when the</p> <p>18 animal control officer visited the home you were</p> <p>19 staying at, true?</p> <p>20 A. Yeah, I do remember laying in the bed and he</p> <p>21 was banging on the door like he was the police and I</p> <p>22 jumped up and answered the door.</p> <p>23 Q. Do you believe the reason you were sleeping</p> <p>24 at whatever time he came is the night before you were</p>
<p style="text-align: center;">Page 18</p> <p>1 so I can answer it truthfully and correctly?</p> <p>2 Q. Would you say each calendar month after</p> <p>3 August 2021, he was there each calendar month up until</p> <p>4 January 2022?</p> <p>5 A. I would say that, yes.</p> <p>6 Q. Okay. On August 18, 2021, what time did you</p> <p>7 wake up that day?</p> <p>8 A. I'm not sure.</p> <p>9 Q. Wake up early, late?</p> <p>10 A. Honestly, I believe I was asleep when the</p> <p>11 gentleman knocked on my door.</p> <p>12 Q. Did you work the night before?</p> <p>13 A. I did.</p> <p>14 Q. When you worked at Uber during this period</p> <p>15 of time in 2021, how late would your night customarily</p> <p>16 go as an Uber driver?</p> <p>17 A. Usually into the mornings.</p> <p>18 Q. By that you mean after midnight?</p> <p>19 A. Yeah, after midnight.</p> <p>20 Q. I think you started to say 5 AM?</p> <p>21 A. It depends on how tired I am that day and</p> <p>22 what time I started the day before. I'm an overnight</p> <p>23 driver.</p> <p>24 Q. So August 17, 2021, approximately what time</p>	<p style="text-align: center;">Page 20</p> <p>1 driving for Uber?</p> <p>2 A. It could be, yes.</p> <p>3 Q. Do you believe he actually woke you up or</p> <p>4 were you laying there awake?</p> <p>5 A. I was -- I really don't know how to answer</p> <p>6 that without just saying it like this, I was half</p> <p>7 asleep, half awake. I was laying in the bed.</p> <p>8 Q. Okay. Where you lived at that time, you</p> <p>9 appeared to have neighbors. If you were to walk out</p> <p>10 your door and then face the street, there appears to</p> <p>11 be a house, there would be what appears to be a white</p> <p>12 house to your left; is that true?</p> <p>13 A. Yes.</p> <p>14 Q. And it's got a chain link fence around it,</p> <p>15 true?</p> <p>16 A. No. It has a broken fence around it.</p> <p>17 Q. Yeah, but you know what a chain link fence</p> <p>18 is?</p> <p>19 A. Yeah, I know, but it wasn't fenced in.</p> <p>20 That's the point I'm getting at. It was not fenced in.</p> <p>21 Q. All right.</p> <p>22 A. But yes.</p> <p>23 Q. In the -- there's a driveway that's -- if</p> <p>24 you were to face the street as you walk out, there</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 21	Page 23
<p>1 would be a driveway to your left if you were facing 2 the street; is that right? 3 A. That is correct. 4 Q. Okay. And then immediately within say 5 20 feet of the driveway there's this white house to 6 the left of the driveway if you were facing the 7 street; is that true? 8 A. Yes. 9 Q. And if you were to walk out your front door 10 and face the right, there appears to be, looks like 11 maybe a yellow house some distance away; is that true? 12 A. Yes. 13 Q. How long would -- how far would you 14 approximate the distance between the house you were 15 staying in and the yellow house that would be to the 16 right if you were facing the street? 17 A. I couldn't tell you. I'm not good at math. 18 Q. Would you say more than 100 feet? 19 A. I couldn't tell you. I'm not good at math. 20 Q. Give me a second. 21 All right. On this date in August 21, 22 20 -- August 18th, 2021, JD was staying with you that 23 day, true? 24 A. Yes.</p>	<p>1 Q. Do you know, was school back in session, 2 August 18, 2021, at this time? 3 A. No, school was not in session. 4 Q. So but JD seemed to be barking at people 5 that walked by your -- walked by your house? 6 A. Drove by my house, yes. 7 Q. Were you surprised when the animal control 8 officer then showed up at your house? 9 A. Yes. 10 Q. Okay. He told you that there was a com -- 11 there was some complaints that he'd received, true? 12 A. Yes. 13 Q. When you spoke to the animal control 14 officer, was anybody else present? 15 A. No. 16 Q. Tell me everything you remember about the 17 conversation, what occurred between him and you in 18 terms of conversation? 19 A. He knocked on the door. I opened the door. 20 He was like they got a complaint about a dog barking. 21 I said to him, do you hear the dog barking other than 22 when you knocked on my door. He was like, no, when I 23 came up, the dog was not barking. Then I was like, 24 well, if there's no dog barking, you shouldn't have a</p>
<p style="text-align: center;">Page 22</p> <p>1 Q. Okay. Where was your son? 2 A. My son was upstairs in his room. 3 Q. Do you know if your dog was barking prior to 4 the animal control officer's approach of your house? 5 A. Yes. 6 Q. What do you know? 7 A. I know that JD was tied up in my front yard 8 and he was barking with people running back and forth. 9 Q. Okay. Dogs do that, right? Dogs do that? 10 A. Dogs do that. 11 Q. All right. So your house didn't have any 12 form of a fence at that time, that's correct, right? 13 A. That is correct, yes. 14 Q. There was also -- you know what an invisible 15 fence is; is that right? 16 A. No, no invisible fences. 17 Q. So you had him on kind of like a tie out, a 18 stake, right? 19 A. He was on a leash, yes. 20 Q. How long was the leash roughly, the length 21 of the leash? 22 A. I couldn't tell you. I'm not good with math 23 but it was not -- it wasn't very long. It only 24 extended to the front yard.</p>	<p style="text-align: center;">Page 24</p> <p>1 reason to knock at my door. We have a complaint so we 2 have to investigate the complaint. Okay. Well, you 3 see the dog, you see he's in the house, and he's fine. 4 Well, we need to see his tags and make sure that he's 5 registered. 6 At that point, I informed him that the 7 dog does not belong to me, and he's registered to the 8 City of Chicago. He, at that time -- that point in 9 time tried to force me to give him the dog's 10 information at which time I closed the door and he left 11 my porch and went to my mailbox. 12 Q. So you say that he tried to, I think you 13 used the word force him -- force you to give up the 14 dog's information. That's what you said? 15 A. Yes, I did say that. 16 Q. Did he put his hands on you? 17 A. No, he forced me with verbally threatening to 18 file charges against me and things to that effect. 19 Q. Okay. So I just want to flesh that out. 20 Tell me everything that you said, tell me everything 21 when you say he forced you, everything that the animal 22 control officer said to you that you considered force? 23 A. He said to me if you don't give me his 24 information, we're going to file charges and send you</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 25	Page 27
<p>1 fines and you have to appear in court is what he said. 2 Q. Okay. Did he say anything else? 3 A. Not that I can remember offhand. 4 Q. So everything that you remember about him 5 attempting to force you -- 6 A. Yes. 7 Q. -- to give up the information is just within 8 the word format that you just gave me, true? 9 A. True. 10 Q. Were you scared? 11 A. I was. 12 Q. How tall are you? 13 A. 6 foot 5. 14 Q. The how much do you weigh? 15 A. At that time I weighed 340 pounds. 16 Q. Fair to say you're a large man? 17 A. Yes. 18 Q. Athletic at all? Play sports? Lift 19 weights? 20 A. No. No. I'm actually disabled. 21 Q. Okay. What is your disability? 22 A. My disability is I have diabetes and have 23 gout and I have bad knees. 24 Q. The animal control officer that confronted</p>	<p>1 didn't say he was going to bring the police until now. 2 A. When he said that he was going to file 3 charges and things like that, normally when they file 4 charges, they come with the police to try to force 5 themselves into your home. 6 Q. Okay. So I want to make sure -- by the way, 7 it sounds like you're an educated man. What were you 8 going to school for? 9 A. Film. 10 Q. Film? 11 A. Motion picture and television production. 12 Q. Did you get a degree? 13 A. Yes. I don't have it. I'll have it at the 14 end of the summer. 15 Q. Associate's, bachelor's, master's, what? 16 A. Associate's. 17 Q. From what university or college? 18 A. College of DuPage, transfer student from 19 McHenry Community College. 20 Q. Okay. So when you told me before that 21 the -- you were afraid that the police were coming, 22 that was your -- you surmised that because he 23 threatened to take you to court and to you court means 24 the police are coming, is that what you're saying?</p>
Page 26	Page 28
<p>1 you, was it a male or a female? 2 A. It was a male. 3 Q. Were you larger than he was? 4 A. I was larger than he was, yes. 5 Q. How would you describe his physical 6 dimensions? 7 A. I'd have to describe him as being a medium 8 build young man, much younger than me that is, long 9 hair, glasses. 10 Q. How tall? 11 A. That's about as much as I can remember. 12 Maybe, I want to say maybe about 5'6", 5'5", 5'6". 13 Q. How heavy roughly? 14 A. Maybe about 190 pounds, 200 pounds. 15 Q. So really you were not scared of his 16 physical dimensions, right? 17 A. No, not scared of his physical dimensions, 18 no. 19 Q. You're a much larger man, true? 20 A. Yes. 21 Q. Okay. What is it that he did that scared 22 you? 23 A. Threatening me with the police. 24 Q. Okay. That's a little different. You</p>	<p>1 A. That's what I'm saying, yes. 2 Q. He didn't actually say the police were 3 coming, correct? 4 A. I don't remember but that's just the way I 5 took it at that time that most times -- that most times 6 when government agencies come and they can't get what 7 they want, they tend to turn to the police department 8 in order to force people into giving them what they 9 want. 10 Q. Did you believe that because your Pomeranian 11 was barking that the police were going to come force 12 their way into your house? 13 A. Hell, I didn't believe that the animal 14 control was going to come because he was barking 15 considering that there are at least ten dogs bigger 16 than my Pomeranian in the neighborhood barking. 17 Q. Okay. So can we agree that it seems kind of 18 like a stretch that animal control shows up, says I'm 19 going to cite you for whatever, and you -- is it a 20 stretch of logic that you believe the police are going 21 to come and knock down your door? 22 A. One moment. I lost volume for a second 23 there. 24 Q. No worries.</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 29	Page 31
<p>1 A. Okay. There we go. What was the question?</p> <p>2 Q. Doesn't it seem kind of like a stretch that</p> <p>3 because your Pomeranian was barking, the police were</p> <p>4 going to knock down your door?</p> <p>5 A. No.</p> <p>6 Q. Did you believe Wonder Lake Police</p> <p>7 Department was going to come and do what, execute a</p> <p>8 search warrant, forcibly enter your -- what did you</p> <p>9 think was going to happen to you?</p> <p>10 A. What I thought was going to happen is exactly</p> <p>11 what did happen. They were going to send a warrant in</p> <p>12 my name, except for it didn't come in my name, it came</p> <p>13 in my son's name, and summon me to court. Through the</p> <p>14 course of at least three years after this incident,</p> <p>15 they were sending summons and fines and things like</p> <p>16 that and this was after I had informed the gentleman</p> <p>17 that the dog does not belong to me so after that he</p> <p>18 should have left.</p> <p>19 Q. You seem like a smart --</p> <p>20 A. He should not -- yeah. What?</p> <p>21 Q. You seem like a smart fellow. Surely you</p> <p>22 know the difference between a summons and an arrest</p> <p>23 warrant, right?</p> <p>24 A. I do.</p>	<p>1 have came with a search warrant for the dog. What I</p> <p>2 believed was that, you know, because I didn't give him</p> <p>3 the information, they could have came to my house with</p> <p>4 a search warrant for a barking dog. I do believe that.</p> <p>5 Q. Did you believe there was going to be a</p> <p>6 search warrant executed for the barking dog?</p> <p>7 A. Yes. Yes.</p> <p>8 Q. What did you -- what were you afraid -- were</p> <p>9 you afraid that they would find anything in the search</p> <p>10 warrant?</p> <p>11 A. No.</p> <p>12 Q. It would be the dog, right?</p> <p>13 A. Yes.</p> <p>14 MR. FLAXMAN: Object to the form of the question.</p> <p>15 What would be the dog?</p> <p>16 MR. OWENS: The subject of the search warrant.</p> <p>17 BY MR. OWENS:</p> <p>18 Q. Okay. I want to hear this clearly. Are you</p> <p>19 telling me that you were scared that the police were</p> <p>20 going to come with a search warrant because of the</p> <p>21 animal control officer's interactions with you; is</p> <p>22 that your testimony?</p> <p>23 A. My testimony, sir, is that because of my past</p> <p>24 background that it would have made me liable for the</p>
Page 30	Page 32
<p>1 Q. Surely you must know the difference between</p> <p>2 a summons and a search warrant, right?</p> <p>3 A. Yes.</p> <p>4 Q. So, I mean, getting a summons for an animal</p> <p>5 control violation, was that surprising to you?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Did you -- did you actually believe</p> <p>8 you were going to get an arrest warrant issued for</p> <p>9 your apprehension based upon the barking dog?</p> <p>10 A. No. I believed that I was going to get an</p> <p>11 arrest warrant for not showing up at court for</p> <p>12 something that I shouldn't have had to go to court in</p> <p>13 the first place for.</p> <p>14 Q. Is it -- okay. Did you believe that there</p> <p>15 was going to be a search warrant issued because of</p> <p>16 your barking dog?</p> <p>17 A. Why would I believe that, sir? I mean --</p> <p>18 Q. That's a great question. That's a great</p> <p>19 question, Mr. Oats.</p> <p>20 A. -- why would I?</p> <p>21 Q. It's fair to say that you did not believe</p> <p>22 there was going to be a search warrant issued for your</p> <p>23 barking dog, that's true, right?</p> <p>24 A. Actually not for the dog. I mean, he could</p>	<p>1 police to come to my house for a search warrant for a</p> <p>2 dog and I have paranoia about any type of law</p> <p>3 enforcement, government agency getting involved in my</p> <p>4 lifetime.</p> <p>5 Q. Have you told me everything about the</p> <p>6 interaction that you had with the animal control</p> <p>7 officer that you spoke to or is there anything else</p> <p>8 about the conversations that you recall?</p> <p>9 A. Other than telling him that the dog was</p> <p>10 registered someplace else, I believe that was the last</p> <p>11 of our conversation. I didn't talk to him no more</p> <p>12 after that but he did -- go ahead.</p> <p>13 Q. We can agree that the animal control officer</p> <p>14 did not threaten to have you arrested, true?</p> <p>15 A. No, we cannot agree to that because I don't</p> <p>16 know what his intentions were.</p> <p>17 Q. No. No. Hear me. All right. What words</p> <p>18 did the animal control officer say to you that caused</p> <p>19 you to fear that there was an arrest warrant coming</p> <p>20 for you, what were the words?</p> <p>21 A. The words were, if I can remember correctly,</p> <p>22 was we have a complaint, it's our job to follow up and</p> <p>23 search about these complaints about a dog barking.</p> <p>24 Well, the dog isn't barking and you've got no, you</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 33	Page 35
<p>1 know, nothing to cause further. And he proceeded to 2 ask me about the dog's papers. 3 At that point, I told him the dog is not 4 mine, he's not registered here but he is registered in 5 Chicago, Illinois. At that point what made me start 6 fearing for, you know, my safety, my home's safety was 7 that the gentleman said, well, I have to see his papers 8 or I'm going to have to call the police. Well, I said 9 that wrong. I apologize. Strike that. He said we 10 will file complaints against you is what he said, not 11 call the police. And then he said that, he said that, 12 you know, I need to see, and, you know, he kept like 13 banging and banging at my door. 14 So I'm like, look, I'm not even going 15 answer the door no more so whether he came back with 16 police or not, I really didn't care. I didn't care 17 because if they were going to come to my house and want 18 to search my house, I've got nothing to hide from them. 19 Q. I think you just said whether he came with 20 the police or not you didn't care, right? 21 A. Yes, because I was totally upset and angry at 22 that point. 23 Q. So you were not afraid that the police were 24 coming? You didn't care, right?</p>	<p>1 A. Maybe 15 minutes. 2 Q. The officer never went in your house, right? 3 A. I wouldn't allow him to. 4 Q. So that's a no, he never went in your house, 5 true? 6 A. No, he never went in my house. 7 Q. And he never touched you, right? 8 A. No, he never touched me. 9 Q. Never touched your dog, right? 10 A. No, he never touched the dog. 11 Q. Okay. You exercised your right to refuse a 12 search, correct? 13 MR. FLAXMAN: Objection, form of the question, 14 assumes facts not presented. 15 MR. OWENS: Which fact is presumed? 16 MR. FLAXMAN: Assumes. I'm sorry. 17 MR. OWENS: Which fact is assumed? 18 MR. FLAXMAN: I don't remember the question but 19 there was something that was assumed in there. 20 BY MR. OWENS: 21 Q. Okay. You exercised your right to refuse 22 his search of your home, true? 23 MR. FLAXMAN: It assumes that the officer wanted 24 to search the home. That's -- I don't know that</p>
<p style="text-align: center;">Page 34</p> <p>1 A. Yes, I was afraid. I'm not afraid of the 2 police. 3 Q. What are you afraid of? 4 A. Them putting drugs on me, them putting a case 5 on me that has nothing to do with me. It's not the 6 police themselves I'm scared of. It's what they can do 7 and the courts believe them. 8 Q. So we can go back to your conversation, the 9 animal control officer never used the word search 10 warrant, true? 11 A. No, he didn't. He just said that he had to 12 search and make sure everything was good with the dog 13 and his papers. 14 Q. Okay. 15 A. He did say that. 16 Q. He did not use the word search warrant, 17 right? 18 A. He didn't say warrant, no. 19 Q. He didn't say arrest warrant, right? 20 A. He didn't say warrant, no. 21 Q. And he didn't use the word police, right? 22 A. No, he didn't. 23 Q. All right. How long did your interaction 24 with the officer last?</p>	<p style="text-align: center;">Page 36</p> <p>1 that's been established. 2 MR. OWENS: That's a good point. I'll strike all 3 that. 4 BY MR. OWENS: 5 Q. Did the officer ask to search your home? 6 A. He did. 7 Q. And did you refuse? 8 A. I did. 9 Q. Did it scare you to refuse? 10 A. Did it matter? 11 Q. It matters, yeah. Did it scare you to 12 refuse? 13 A. I did, I was a little shaken at that point 14 because I was surprised he even asked to come into the 15 house. 16 Q. What happened next? 17 A. He -- I closed the door in his face and I 18 went to my window but before I went to the window, he 19 was banging and banging and banging. When he stopped 20 banging on the door, I went to my window. I noticed 21 him leave off my porch. He stopped at the mailbox 22 and -- 23 Q. Can I stop you for a second? 24 A. Sure.</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 37	Page 39
<p>1 Q. You're looking out a window? 2 A. Uh-huh. 3 Q. If you were to walk out your door, there's a 4 porch there? 5 A. Yes. 6 Q. Okay. It's a wooden porch? 7 A. Yes. 8 Q. Excuse me one second. Excuse me one second. 9 Sorry about this. Give me one second. 10 If you were going to walk out on your 11 porch facing the street, there's a window to your 12 left, right? 13 A. Two windows. 14 Q. Well, there's two windows to your left? 15 A. No, there's one big window with a double 16 layer on the top of the window. 17 Q. Okay. And then there's a window to your 18 right, right? 19 A. Yes. 20 Q. Window to your left is over the porch, 21 correct? 22 A. Yes. 23 Q. And the window to the right if you're facing 24 the street is not over the porch, right?</p>	<p>1 Q. Do you know what a parkway is? 2 A. I'm not sure, no. 3 Q. Do you know what an easement is? 4 A. No, actually I don't. 5 Q. Okay. So let's go, let's go back to the 6 complaint to paragraph 7. When you were on the 7 porch -- 8 A. Uh-huh. 9 Q. -- speaking to the animal control officer, 10 did the animal control officer actually attempt to 11 enter your home? 12 A. I can't remember but he was so close that I 13 had to like kind of keep the dog from running out, and 14 then I just closed the door in his face after I went 15 back in because I stepped onto the porch -- 16 Q. So was there ever a time -- 17 A. -- to talk to him. 18 Q. -- when he stepped into the residence? 19 A. No. 20 Q. Was there ever a time where he tried to put 21 a foot inside the residence? 22 A. Not that I can remember. 23 MR. OWENS: So let's look at paragraph 5. I need 24 it down a little bit.</p>
<p style="text-align: center;">Page 38</p> <p>1 A. Right. 2 Q. Which window were you looking out? 3 A. The one over the porch. 4 Q. Okay. Got you. 5 All right. And then what did you see? 6 A. I saw him leave off the porch, walk towards 7 the driveway, and then he went towards the mailbox. 8 Q. Okay. What did you see next? 9 A. I saw him open the mailbox, look through a 10 few pieces of mail, put the rest back in, and went to 11 his car. 12 Q. Where was the mailbox? 13 A. The mailbox was on the property just off of 14 the driveway. 15 Q. Mailbox was not on your porch, correct? 16 A. No, it was not on my porch. 17 Q. The mailbox was not attached to your house, 18 correct? 19 A. No, it was not attached to the house. It was 20 actually attached to the lawn, not on the curb but on 21 the lawn. 22 Q. At that time was there a parkway in front of 23 your house? 24 A. A what?</p>	<p style="text-align: center;">Page 40</p> <p>1 BY MR. OWENS: 2 Q. Paragraph 5 of your complaint, it reads, on 3 August 18 -- August 18th, 2021, Defendant Enos acting 4 under color of his authority as an animal control 5 officer crossed the curtilage of plaintiff's dwelling 6 and attempted to speak with plaintiff and enter and 7 search plaintiff's dwelling. That's what it says, 8 right? 9 A. Okay. 10 Q. That's what it says, true? 11 A. Yes, that's what it says. 12 MR. OWENS: Okay. Could you -- can you point, 13 put the cursor on the word enter. 14 BY MR. OWENS: 15 Q. The portion there where it says that Enos 16 attempted to, quote, enter your dwelling, we can agree 17 that that's not true, correct? 18 A. Yes. 19 Q. Okay. If we could go down to, well, 20 actually staying there, if we could go to the, comma, 21 crossed the curtilage of plaintiff's dwelling, do you 22 see the portion that says crossed the curtilage of 23 plaintiff's dwelling? Do you see that language? 24 A. Yes.</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 41	Page 43
<p>1 Q. What does that mean? 2 MR. FLAXMAN: Objection, form of the question. 3 BY MR. OWENS: 4 Q. Okay. Go ahead. 5 MR. OWENS: Are you telling him not to answer? 6 MR. FLAXMAN: Oh, no. 7 BY MR. OWENS: 8 Q. Okay. So, Mr. Oats, what is -- the portion 9 of the complaint that reads, of your complaint that 10 reads crossed the curtilage of plaintiff's dwelling, 11 what does that mean? 12 A. He came onto my porch after I guess getting 13 the complaint, and if you are looking at pictures of 14 the porch, it actually is attached to the house. So 15 when I had to come onto the porch to talk to him, he 16 did try to stop me from going back into the house, 17 meaning, like, you know, that's when he came across 18 with the whole, you know, we're going to do this and do 19 that and the third so I closed the door and walked away 20 from him. 21 Q. So the curtilage part, what part is the 22 curtilage? What is -- is that the lawn, the porch, 23 what is that? 24 MR. FLAXMAN: Object to the form of the question.</p>	<p>1 take at that time to enter onto the property? 2 A. Maybe three or four steps if you're coming 3 from the curb or coming from the street. 4 Q. Okay. So you're a 6'5" man. Is it three or 5 four of your steps -- I'm 5'7" -- or three or four of 6 my steps? 7 A. Three or four of your steps. 8 Q. So what do you think, five, six feet? 9 A. I couldn't answer that because, like I told 10 you, I'm not good in math. 11 Q. More than -- you think more than 10 feet? 12 A. I think that I don't know how to answer that 13 because I'm not good at math. 14 Q. So you have no clue how many feet your 15 mailbox existed from the street? 16 A. I knew if I walked from the street to my 17 property where the mailbox is, it will take maybe two, 18 three of my steps or three or four of your steps. 19 Q. Okay. 20 A. Depends on the strides. 21 Q. Nobody knows how long your steps are better 22 than you. Three of your steps is how long? 23 MR. FLAXMAN: I'm going to object to the form of 24 the question and the testimony by counsel.</p>
<p>1 He doesn't have to know what those words mean. 2 BY MR. OWENS: 3 Q. If you don't know, you can say you don't 4 know? 5 A. Okay. I don't know. 6 Q. All right. Go to paragraph 7. Paragraph 7 7 reads before leaving plaintiff's dwelling, defendant 8 Enos accessed plaintiff's private mailbox that is not 9 located on the curb or otherwise easily accessible by 10 the public. That's what it says, right? 11 A. Yes. 12 Q. Do you know what's being -- the location of 13 the mailbox in paragraph 7, do you know where that is 14 describing? 15 A. I'm not understanding the question but if 16 you're asking me if I knew where my mailbox was, it was 17 on my lawn on my property, not on the curb, not easily 18 accessible. You literally have to come onto the 19 property in order to access it. 20 Q. So I want to make sure we're -- I don't want 21 to put words in your mouth. Onto the property, 22 meaning the real estate, right? 23 A. Yes. 24 Q. How many steps do I need -- would I need to</p>	<p>1 BY MR. OWENS: 2 Q. When you say three steps, Mr. Oats, how far 3 do you get to? It seems like a long way. 4 A. No, it's not a long way. I'm handicapped, 5 remember? I can't walk too far and I can't, you know, 6 do the stride that I was when I was younger. So three 7 or four of my steps would probably be about, I don't 8 know, I couldn't tell you, from maybe -- actually it's 9 hard without having a visual to at least, you know, 10 give you some type of reference but I don't stride that 11 far. 12 Q. So more than four feet? 13 A. Okay. And still we're back to the asking me 14 mathematics and trying to range something. I can't 15 answer that. 16 Q. You're almost a college graduate, Mr. Oats. 17 You don't know how many four feet are? 18 MR. FLAXMAN: Object to the form of the question. 19 It's argumentative. And if you keep harassing him 20 like that, we will suspend the deposition and go to 21 the Magistrate. That's improper and you know it. 22 BY MR. OWENS: 23 Q. Mr. Oats? 24 A. Yes.</p>
	11 (Pages 41 to 44)

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">Page 45</p> <p>1 Q. Do you know how far 4 feet is? 2 A. I'm taking a class of refresher adult 3 mathematics, sir, and, you're right, I am almost a 4 college graduate but I need to take this refresher in 5 order to graduate. So if you keep asking me how far 6 and how long, I'm going to keep giving you the same 7 answer. I've got nothing to reference it to, nothing 8 to, you know, to let you know what it is so we can 9 either move on or, you know, you just keep asking the 10 same question and getting the same answer. 11 Q. Let me try one more time. Okay? I'm going 12 to try a different way. 13 Is it at least as long as you are, 14 6 foot 5? 15 A. No. No. My strides aren't that long, no. 16 Q. So it's something less than that, right? 17 A. Yes. 18 (Whereupon, Oats Deposition Exhibit No. 2 was marked for identification.) 19 MR. OWENS: Can we get Exhibit 2 up, the photo. 20 BY MR. OWENS: 21 Q. Let me show you a photograph, Exhibit 2. 22 Can you see Exhibit 2, Mr. Oats? 23 A. Yes.</p>	<p style="text-align: center;">Page 47</p> <p>1 this picture was taken before I moved in. 2 Q. Okay. The less than six and a half feet 3 that you -- take it down -- the less than six and a 4 half feet that you told us about, would that be from, 5 well, would that be from the street? 6 A. Yes. 7 Q. Okay. Where did the officer park? 8 A. Where the tree is, in front of the tree. 9 Q. In the driveway or on the street? 10 A. On the street in front of the tree. 11 Q. So that tree was still there? 12 A. Yes. 13 Q. There is -- I don't know what you call 14 these -- like landscape logs. Were they there then? 15 A. Yes. 16 Q. But they were just moved back? 17 A. No. Actually the mailbox was taken out of 18 there and pulled back just beyond the logs. 19 MR. OWENS: Can you put that photo back up? 20 MR. HAMILTON: Yes. 21 BY MR. OWENS: 22 Q. All right. Can you see the photograph, 23 Exhibit 2, again? 24 A. Yes.</p>
<p style="text-align: center;">Page 46</p> <p>1 Q. Okay. Exhibit 2, does that appear to be a 2 photograph of the home that you resided in on 3 August 18, 2021, next to one house to the right if 4 you're facing it and another house to the left if 5 you're facing it? 6 A. It -- it looks like it but then it doesn't 7 look like it, yes. 8 Q. Okay. The best you can tell, does that 9 appear to be a fair and accurate showing of your 10 property in August 2021? 11 A. This is correct, yes. 12 Q. All right. Can you use the cursor to point 13 to where his mailbox is. 14 Okay. This, you see where the cursor 15 is, Mr. Oats? 16 A. Yes. 17 Q. All right. That's where the mailbox was on 18 this date of August 18, 2021? 19 A. No, it was actually back a bit further. 20 Q. You're saying the mailbox has moved since 21 when this photo was taken? 22 A. Yes. The whole house had been -- actually 23 the whole property and the house had been remodeled 24 since then, since this picture was taken, and actually</p>	<p style="text-align: center;">Page 48</p> <p>1 MR. OWENS: Could you move the cursor immediately 2 beyond the logs. 3 BY MR. OWENS: 4 Q. You're saying -- can you see the cursor, Mr. 5 Lamond -- or Mr. Oats? 6 A. Yes. 7 Q. Is that where it was? 8 A. Up just a little bit. No, wrong way. Wrong 9 way. Just beyond where the for sale sign is. In that 10 area, yes. 11 Q. Put it a little closer toward the sign. Is 12 that the location? 13 A. Yeah. And then it was more so in, more in a 14 little bit. 15 Q. Move it toward the mailbox more. There? 16 A. No. No. The opposite way. Right where the 17 sign is and -- 18 Q. You mean to the left? 19 A. Yeah, just to the left, just a little bit. 20 Q. Okay. 21 A. That's where I can remember, pretty much 22 remember where the mailbox being on the date that he 23 had came in. 24 Q. What year did you move into this house?</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 49	Page 51
<p>1 A. I moved into the house in approximately 2010, 2 2009, 2010.</p> <p>3 Q. Did you then move the mailbox to where it is 4 shown in the photograph?</p> <p>5 A. No, it was moved, it was moved before I moved 6 in there.</p> <p>7 Q. All right. I want to make sure I 8 understood --</p> <p>9 A. And the mailbox, if I'm looking at this 10 correctly, that's a wooden mailbox. The mailbox that 11 was on the property when I moved in was metal.</p> <p>12 Q. Well, the mailbox itself looks metal.</p> <p>13 A. No, I'm talking about the stand that it's 14 sitting on.</p> <p>15 Q. Okay. Understood.</p> <p>16 So I just want to make sure I'm 17 understanding what you're saying. Where the mailbox 18 it situated in this photograph --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- you're saying it was moved by the time 21 you moved in?</p> <p>22 A. Correct. Yeah, prior to me moving in, it was 23 moved, yes.</p> <p>24 Q. Have you ever seen the mailbox where it is</p>	<p>1 you lived there?</p> <p>2 A. Partially because they had decayed I believe.</p> <p>3 Q. So would you say the portion of the 4 landscape logs closest to the street were there?</p> <p>5 A. Yes.</p> <p>6 Q. Were the portion of the landscape logs 7 closer to your house there when you moved in?</p> <p>8 A. They were -- I don't know about the logs 9 moved but the mailbox was closer. That's the only 10 thing I can tell you about that. I had paid no 11 attention to it because, you know.</p> <p>12 Q. I guess what I'm trying to ask is, okay, so 13 you can see two lines of landscape logs, one front and 14 one back, right?</p> <p>15 A. Yes.</p> <p>16 Q. All right. The one that's back furthest 17 away from the street, was that line there if you 18 remember?</p> <p>19 A. Well, I can't remember. I know it had 20 something like that there.</p> <p>21 Q. Okay. Was the mailbox -- I'm assuming the 22 for sale sign was not there when you moved in, right?</p> <p>23 A. No, it wasn't.</p> <p>24 Q. And the for sale sign wasn't there on</p>
<p style="text-align: center;">Page 50</p> <p>1 now as depicted in this Exhibit 2?</p> <p>2 A. No.</p> <p>3 Q. And you were not the person or nobody within 4 your household was the person that moved it back, 5 true?</p> <p>6 A. I didn't live in the house. I didn't, you 7 know, didn't even know the landlady at that time 8 neither.</p> <p>9 Q. So --</p> <p>10 A. I had nothing to do -- at the time of this 11 picture, I had nothing to do with this house.</p> <p>12 Q. I just want to make sure we got everything 13 covered here. Whatever you call the landscape logs, 14 you know what I'm talking about, right, the wooden 15 things?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. Can we agree that kind of makes sort of a 18 broken rectangle?</p> <p>19 A. I wouldn't be able to tell you, sir. I see 20 one of the logs moved from there, yes, but I couldn't 21 tell you about a broken rectangle or not. I know that 22 I had nothing to do with that.</p> <p>23 Q. Fair enough.</p> <p>24 But were those landscape logs there when</p>	<p style="text-align: center;">Page 52</p> <p>1 August 18, 2021?</p> <p>2 A. No, it wasn't.</p> <p>3 Q. On August 18th, 2021, were the landscape 4 logs there as they're shown in this photograph?</p> <p>5 A. I can't remember.</p> <p>6 Q. Can you see like -- there's a tree inside 7 the landscape logs, right?</p> <p>8 A. Yes.</p> <p>9 Q. There's something to the left --</p> <p>10 A. Hum?</p> <p>11 Q. There's something to the left of it where 12 the cursor is.</p> <p>13 A. One moment.</p> <p>14 Q. Do you see where the cursor is?</p> <p>15 A. Wait a second. I got to get back to it.</p> <p>16 Okay. Every time I try to go over there, it moves the 17 whole screen. Are you talking about the little gray 18 thing that's there?</p> <p>19 Q. Yeah, that thing. What is that?</p> <p>20 A. Um, I don't know what the hell that is.</p> <p>21 Q. Was it there in August 2021?</p> <p>22 A. It was, yes.</p> <p>23 Q. Okay. Can we go back out.</p> <p>24 Was the mailbox closer to the front</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 53	Page 55
<p>1 landscape logs or the back landscape logs in August 2 2021?</p> <p>3 A. When I moved in --</p> <p>4 Q. No, in August 2021?</p> <p>5 A. It was actually closer to the back.</p> <p>6 Q. Okay. How far from the back, more than a 7 foot?</p> <p>8 A. I couldn't tell you.</p> <p>9 Q. Okay.</p> <p>10 MR. FLAXMAN: Let me suggest that we find out 11 which is the back and which is the front.</p> <p>12 MR. OWENS: I just said the front is closest to 13 the street, back is furthest from the street.</p> <p>14 BY MR. OWENS:</p> <p>15 Q. That's how you understand it, Mr. Oats, 16 right?</p> <p>17 A. Yes.</p> <p>18 Q. So and then the landscape log in the photo 19 that is right of where the mailbox is, was that there?</p> <p>20 A. I don't know because, like I told you, the 21 mailbox when I moved in was further back and it was 22 actually in between the front and the back there if 23 they were down. I just know that where it is now, it 24 was not there when I moved in. And this picture</p>	<p>1 A. So judging from the picture you have up, 2 there was a wooden porch that extended to a little 3 walkway. He walked from the walkway, from the little 4 walkway around down towards the driveway, and he walked 5 down towards the driveway, he stopped by the mailbox, 6 opened it up, searched through a few pieces of mail, 7 put the mail back in the mailbox, walked past these 8 trees to sit into his car after which time, I'd say 9 maybe 15 minutes, if that long, he came back and 10 attached a piece of paper to my door.</p> <p>11 I can't hear nobody. Can you guys hear 12 me?</p> <p>13 Q. I was just talking to my partner. Hang on 14 one second.</p> <p>15 Okay. How many pieces of mail did he 16 look at?</p> <p>17 A. I was unsure but when I went out to go get my 18 mail, there were three pieces of mail in there.</p> <p>19 Q. What were they?</p> <p>20 A. One was an electric bill in my name, one was 21 a magazine or piece of paper that had Ms. Cosby's name 22 on it, and the other piece of mail was a letter from a 23 cousin I believe. Both the two pieces of mail had my 24 name on it though.</p>
<p style="text-align: center;">Page 54</p> <p>1 doesn't represent an accuracy of the -- of the area of 2 the incident when it happened.</p> <p>3 Q. What is inaccurate about it?</p> <p>4 A. Inaccurate is is that here you can see those 5 logs that you're talking about. Okay. When I moved 6 in, they were kind of faded out. The mailbox was not 7 in the place where it's at now.</p> <p>8 Q. But the logs were faded but they were there, 9 right?</p> <p>10 A. I'm -- yeah. Yes.</p> <p>11 Q. Would you say --</p> <p>12 A. But they look --</p> <p>13 Q. Would you say --</p> <p>14 A. They looked more -- go ahead.</p> <p>15 Q. Would you say the mailbox is in the middle 16 between the front and the back?</p> <p>17 A. In this picture it looks like it's in the 18 front but that's not where it was when I lived there.</p> <p>19 Q. In August 2021 was it in the middle?</p> <p>20 A. It was in the middle.</p> <p>21 Q. Okay. Fair enough.</p> <p>22 All right. Now, you see the officer --</p> <p>23 you say he went through your mail. Tell me what you 24 saw?</p>	<p style="text-align: center;">Page 56</p> <p>1 Q. Did you keep it?</p> <p>2 A. I kept the one with Ms. Cosby's name on it.</p> <p>3 It should have been entered into evidence.</p> <p>4 Q. So, okay, so you -- did you hand that -- it 5 was a magazine or a piece of paper you said, right?</p> <p>6 A. I believe it was, yes. It was a piece of 7 junk mail.</p> <p>8 Q. Okay.</p> <p>9 A. What we would consider junk mail.</p> <p>10 Q. Did Ms. Cosby get junk mail there 11 frequently?</p> <p>12 A. She did until she had her address changed.</p> <p>13 Q. Okay. And then you gave the piece of paper 14 to your attorney?</p> <p>15 A. I believe I faxed it to him, yes.</p> <p>16 Q. Okay. And it was your expectation that 17 would be, I think you used the words, entered into 18 evidence, right? That's what you said?</p> <p>19 A. Yes, because I had to use it at my hearing 20 when I went to McHenry County Courthouse for the 21 charges that were put against me for animal cruelty.</p> <p>22 Q. Okay. And by giving it to when you say your 23 attorney, you mean Mr. Flaxman, right?</p> <p>24 A. Yes.</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 57	Page 59
<p>1 Q. And it was your expectation that Mr. Flaxman 2 would turn that over to us in discovery? 3 A. It wasn't my expectations. I gave it to him 4 so he knew what was going on. Whether he turned it 5 over to you guys in discovery or not, I'm not a legal 6 expert. I couldn't tell you. 7 Q. That's a fair point. 8 MR. OWENS: Let's go off the record. 9 (Discussion off the record.) 10 MR. OWENS: Let's go back on the record. 11 As a matter of record, I've asked 12 Mr. Flaxman if he has a copy of the document. I've 13 considered this on the record. I'm requesting the 14 document. The document has not been produced in 15 discovery. We're requesting that it be produced as 16 has been described by Mr. Oats. 17 MR. FLAXMAN: I will search my records and see if 18 I can find it. 19 MR. OWENS: All right. 20 THE WITNESS: If you can't, I still have the 21 piece of mail. 22 MR. FLAXMAN: All right. Well, hold onto it, 23 sir, and we'll produce it. 24 THE WITNESS: Okay.</p>	<p>1 Avenue. 2 Q. Okay. The animal control officer taped the 3 notice to your door, right? 4 A. Yes. 5 Q. Did you see him do it? 6 A. Yes. 7 Q. Okay. Go to paragraph 13. You make the 8 allegation at paragraph 13 that the above-described 9 conduct by Defendant Enos violated plaintiff's rights 10 under the Fourth Amendment of the United States 11 Constitution. That's what it says, right? 12 A. Yes. 13 Q. What part of the above-described conduct by 14 defendant are you referring to? What was it that 15 violates, according to your complaint, the Fourth 16 Amendment? 17 MR. FLAXMAN: Let me make my objection. I object 18 that you're asking for a legal description of what's 19 in the complaint which is beyond his competency but go 20 ahead. 21 BY MR. OWENS: 22 Q. Go ahead, Mr. Oats. 23 A. Yes. 24 MR. FLAXMAN: Go ahead.</p>
<p>1 BY MR. OWENS: 2 Q. Thank you. 3 All right. So he sits in the car, that 4 is the animal control officer. How long does he sit 5 there for? 6 A. About 15 minutes. 7 Q. What is he doing? 8 A. I'm guessing that he is writing up his 9 report. 10 Q. You don't know that though, right? 11 A. I know that after he gets back out of his 12 car, he comes and attaches it to my front door. That's 13 the only thing that I can attest to at this point. So 14 whatever he was doing in the car, I could not -- I 15 could not comment on that. 16 Q. Did you see him post the notice on your 17 door? 18 A. Yes. 19 Q. Okay. And then if we could go to -- back to 20 the complaint at paragraph 12, was Ms. Cosby -- is it 21 Cosby or Crosby? 22 A. Cosby. 23 Q. Was she living with you at that time? 24 A. No. She was living in Chicago, Springfield</p>	<p>1 THE WITNESS: Okay. 2 BY MR. OWENS: 3 Q. What part of what he did is the 4 above-described conduct that violated the Fourth 5 Amendment? 6 A. The illegal search and seizure. He entered 7 my mailbox which is a binding -- which is a binding 8 contract between myself and the post office. Now, if 9 it was left in the trash and he went through it, then 10 it wouldn't be no violation of my rights but seeing how 11 I did not touch my mail and he went in my mailbox, it's 12 a clear violation. 13 Q. You've got a contract with the post office? 14 A. Everyone has a contract with the post office. 15 It's alleged in my original complaint. 16 Q. We can agree that you don't have an actual 17 written contract with your name and somebody from the 18 post office, right? 19 A. We can agree that the Federal law states that 20 no one can enter into a person's mailbox, whether it be 21 law enforcement, government agencies, except for the 22 person the mailbox is belonging to. 23 Q. I just want to make sure we're on the same 24 page here. There's no contract between you and the</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 61	Page 63
<p>1 post office, right?</p> <p>2 A. And I'm not going to answer that. I'm 3 telling you what the law states. The law states that 4 there is no reason for him to enter into my mailbox. 5 Him going in there, taking anything out of my mailbox 6 constitutes illegal search and seizure.</p> <p>7 Q. Here is the question. You said that there's 8 a contract between you and the post office. My 9 question is have you signed anything with the post 10 office, between you as signatory and the post office 11 as signatory, and you're refusing to answer that 12 question; is that right?</p> <p>13 MR. FLAXMAN: Let me object. That's 14 mischaracterizing his testimony.</p> <p>15 MR. OWENS: Can we stipulate, Mr. Flaxman, like 16 everybody else, he doesn't have a contract with the 17 post office?</p> <p>18 MR. FLAXMAN: An implied contract by law. He 19 doesn't have a document that the postmaster signed and 20 that he signed, we'll agree to that.</p> <p>21 MR. OWENS: I'll accept the stipulation. There's 22 no express contract between him and the post office, 23 right?</p> <p>24 MR. FLAXMAN: There's no written contract.</p>	<p>1 didn't do at that mailbox, I couldn't attest to it 2 because I was not there to see that. I know that he 3 went into the mailbox, which he was never supposed to 4 do.</p> <p>5 Q. Okay. When you said he went into the 6 mailbox, let's break that down. Did he open the 7 mailbox door?</p> <p>8 A. Opened the mailbox, stuck his hand into the 9 mailbox, pulled something out, put it back, and went to 10 his car.</p> <p>11 Q. I thought you said you couldn't see what he 12 pulled out?</p> <p>13 A. I didn't -- I said I couldn't see the 14 envelope or what it was he pulled out. He stuck his 15 hand in the mailbox, like I just told you, pulled his 16 hand out, went back to the car.</p> <p>17 Q. When he pulled his hand out, was there mail 18 in his hand?</p> <p>19 A. I could not tell you.</p> <p>20 Q. So you can't tell us what he looked at in 21 the mailbox, right?</p> <p>22 A. I can't tell you. I can only tell you what I 23 pulled out of the mailbox that had Ms. Cosby's name on 24 it.</p>
<p style="text-align: center;">Page 62</p> <p>1 MR. OWENS: Fair enough. We'll take the 2 stipulation.</p> <p>3 BY MR. OWENS:</p> <p>4 Q. All right. So you said the search and 5 seizure. You're not saying that the officer took 6 anything with him, are you?</p> <p>7 A. I couldn't see from my vantage point. I know 8 that he went in the mailbox, came back, went to his 9 car, came back, put something -- put a notice on my 10 door for a resident that didn't live in that apart -- 11 live in that house and a phone number that was never 12 registered to her ever.</p> <p>13 Q. Did you see what items of --</p> <p>14 A. I did not. I was too far away.</p> <p>15 Q. So for all you know, he didn't look at the 16 magazine or the paper, right?</p> <p>17 A. I could not tell you. I was too far away to 18 see that. I just seen him going into the mailbox.</p> <p>19 Q. All right. So I want to make sure the 20 record is clear on this. We can agree that you didn't 21 see him pull any mail out of the mailbox, it was too 22 far away, right?</p> <p>23 A. That is not what I'm saying. What I'm saying 24 is I saw him go into the mailbox. What he did or</p>	<p style="text-align: center;">Page 64</p> <p>1 Q. I'm not asking what you pulled out. We can 2 agree, your testimony is you can't tell what he -- 3 that he looked at anything, right?</p> <p>4 A. I --</p> <p>5 MR. FLAXMAN: That's a different --</p> <p>6 THE WITNESS: -- am not saying -- that's not what 7 I'm saying. Okay. And stop -- and please stop trying 8 to put words in my mouth.</p> <p>9 BY MR. OWENS:</p> <p>10 Q. What did he look at?</p> <p>11 A. What did he look at, he looked at mail. What 12 type of mail, couldn't tell you. I just know it was 13 mail because it was in my mailbox.</p> <p>14 Q. How do you know he looked at mail? Did you 15 see mail in his hand?</p> <p>16 A. Why would he be standing at the mailbox, open 17 it up, and putting his hand in if he wasn't looking at 18 the mail.</p> <p>19 Q. Mr. Oats, I get to ask the questions. You 20 understand that, right? Your job is to answer and I 21 get to ask them, right? You get that?</p> <p>22 A. Okay. And I don't have to answer them. Now, 23 come on.</p> <p>24 Q. Yeah, you do. Yeah, you do, or if you're --</p>

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">Page 65</p> <p>1 MR. FLAXMAN: Let's all calm down and start over 2 again.</p> <p>3 MR. OWENS: Everybody is calm. Everybody is 4 calm.</p> <p>5 BY MR. OWENS:</p> <p>6 Q. Mr. Oats, did you ever see mail in the 7 animal control officer's hand?</p> <p>8 A. I was too far away to see it from the angle 9 that I was because his hand was being blocked by the 10 mailbox.</p> <p>11 Q. Okay. So you cannot tell us what he looked 12 at if that's true, correct?</p> <p>13 A. I couldn't tell you what he looked at if I 14 saw it in his hand because I was too far away.</p> <p>15 Q. All right. The next paragraph reads that 16 you were outraged, upset, and distressed when you saw 17 the notice of violation and learned the -- and learned 18 about the Fourth Amendment violation and that you 19 suffered severe emotional distress as the direct and 20 proximate cause of that violation, true?</p> <p>21 A. Yes.</p> <p>22 Q. Is that what it says?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Is that all true?</p>	<p style="text-align: center;">Page 67</p> <p>1 was ordering ED medicine, he would have been in my 2 mailbox rambling through my private stuff.</p> <p>3 Q. Did he see any ED medicine that you know of?</p> <p>4 A. He could have.</p> <p>5 Q. Okay. Was there any ED medicine that day 6 when you went out there?</p> <p>7 A. No, there was none out there when he -- when 8 I went out there, no.</p> <p>9 Q. Can we agree that he didn't see any ED 10 stuff, right?</p> <p>11 A. Well, yeah, we can agree with that. That's 12 still beside the point.</p> <p>13 Q. Okay. And were you upset that he saw the 14 letter from your cousin?</p> <p>15 A. No.</p> <p>16 Q. I mean, he wasn't able to read the letter 17 from your cousin, right?</p> <p>18 A. No, other than where the letter had came 19 from.</p> <p>20 Q. Okay. So we can agree that you weren't 21 upset that he saw the Cosby paper, utility bill, and 22 the letter from the cousin but you were outraged, 23 upset, and distressed?</p> <p>24 MR. FLAXMAN: Object to the form of the question.</p>
<p style="text-align: center;">Page 66</p> <p>1 A. Yes.</p> <p>2 Q. You were outraged -- I want to get this 3 straight -- you were outraged, upset, and distressed 4 that he opened your mailbox? Is that what it is or 5 something else?</p> <p>6 A. I was outraged and distressed because the 7 gentleman went into the mailbox. That's my private 8 mailbox. It's my private stuff. I'm pretty sure you 9 would be upset also if he went in your mailbox.</p> <p>10 Q. Remind me again, did you care that he saw 11 Ms. Cosby's piece of paper? Did that upset you?</p> <p>12 A. No, that didn't upset me. It upset me, it 13 upset me that he, you know, that he put her name on 14 there.</p> <p>15 Q. All right. So the other two pieces of mail 16 were to you. Remind me again, what were they again?</p> <p>17 A. They were a utility bill and a letter from my 18 cousin.</p> <p>19 Q. None of the mail was opened, correct? It 20 was still fully sealed when you got it, right?</p> <p>21 A. I believe so.</p> <p>22 Q. Okay. Were you upset that he saw the 23 utility bill?</p> <p>24 A. No, actually I wasn't. I was upset that if I</p>	<p style="text-align: center;">Page 68</p> <p>1 It's argumentative.</p> <p>2 BY MR. OWENS:</p> <p>3 Q. Or not? If you weren't, let me know. What 4 were you outraged, upset, and distressed about if you 5 weren't upset by him seeing the documents you told us 6 about?</p> <p>7 A. Uh-huh. It wasn't him seeing the documents 8 that made me upset. It was him after I informed him 9 about the information of the dog that he still 10 proceeded to his car to write a falsified document and 11 place it on my door at which time I took the same 12 document down to animal cruelty to complain to his 13 supervisors at which time I was greeted with you can't 14 film in here and you need to leave and they were just 15 really rude down there. They didn't even want to take 16 the statement.</p> <p>17 Q. What made you more mad, the mailbox or how 18 they treated you at Animal Control?</p> <p>19 A. How, how they treated me at Animal Control 20 because I'm a citizen too.</p> <p>21 Q. You got rights, right? You got rights?</p> <p>22 A. This is true.</p> <p>23 Q. All right. You think -- you believe they 24 should have treated you better at Animal Control,</p>

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">Page 69</p> <p>1 right?</p> <p>2 A. I think they shouldn't have treated me like I 3 was Black. That's what I think. I think the fact that 4 there are at least ten dogs in my neighborhood that 5 were barking and he never stopped once to talk to any 6 of the neighbors to make sure that it wasn't their dog 7 barking and when he approached -- when he approached my 8 property, my dog was not out -- or not my dog, my 9 daughter's dog was not out, he was not barking, and 10 didn't bark until the animal control officer was 11 banging on the door like he was the police.</p> <p>12 Q. So you think he discriminated against you, 13 right?</p> <p>14 A. He could have. He could have.</p> <p>15 Q. Is that why you were outraged?</p> <p>16 A. No. I was outraged because he still after I 17 explained to him -- keep in mind, when you're saying 18 outraged, this outrage took place after our initial 19 confrontation. So after I told him what I had to tell 20 him at first and he still persisted to, in my words, 21 make me give him information that I was not going to 22 give him, he went to his -- to the mailbox, to his car, 23 and in retaliation tried to hit me with an ordinance 24 violation. That's why I was outraged. So then I went</p>	<p style="text-align: center;">Page 71</p> <p>1 already given you the answer and not that Mr. Flaxman 2 was coaching me. You keep asking me the same question 3 over and over again and, like I told you, and like I 4 told you and been telling for the longest, it was the 5 entire event, not that he went in my mailbox, not how 6 they treated me down there. It was the entire event.</p> <p>7 I'm a citizen. I'm human and I'm pretty 8 sure had you got treated the same way -- I tell you 9 what, why don't you come to my neighborhood or come to 10 my old neighborhood and see how they treat you and see 11 how much you like it.</p> <p>12 Q. I'm not suing anybody, Mr. Oats.</p> <p>13 A. That's -- it makes no difference. I mean, 14 you want to know. You keep asking the questions.</p> <p>15 MR. FLAXMAN: Okay. Let's stop and let's get to 16 another question, please.</p> <p>17 MR. OWENS: Sure. Sure. Fair enough.</p> <p>18 BY MR. OWENS:</p> <p>19 Q. All right. So you suffered severe emotional 20 distress based upon the conversation on the porch, the 21 mailbox, and then what happened at the building; is 22 that right?</p> <p>23 A. Yes.</p> <p>24 MR. OWENS: Can we get the interrogatory answers?</p>
<p style="text-align: center;">Page 70</p> <p>1 to his job to complain to his supervisors and --</p> <p>2 Q. Okay. Go ahead.</p> <p>3 A. Go ahead.</p> <p>4 Q. You saw the mailbox thing as you told me 5 about?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Were you outraged about that or were you 8 outraged because they treated you so poorly at the 9 Animal Control building?</p> <p>10 MR. FLAXMAN: I object to the form of the 11 question. He could have been outraged at both.</p> <p>12 MR. OWENS: Okay. Thanks for the speaking 13 objection that has the effect of coaching. I'd ask 14 you, Mr. Flaxman, not to coach your witness.</p> <p>15 MR. FLAXMAN: I would ask you not to ask trick 16 questions that try to get him to give you an answer 17 that you like rather than the truth.</p> <p>18 MR. OWENS: Counsel, you want to talk about 19 discussing matters with the Court? Can we -- can you 20 not coach your witness? Okay?</p> <p>21 BY MR. OWENS:</p> <p>22 Q. So what's the answer to the question, 23 Mr. Oats?</p> <p>24 A. The answer to the question is that I've</p>	<p style="text-align: center;">Page 72</p> <p>1 It's going to be Exhibit No. 3. Can you go down. Can 2 you show him the whole exhibit.</p> <p>3 (Whereupon, Oats Deposition Exhibit No. 3 was 4 marked for identification.)</p> <p>5 BY MR. OWENS:</p> <p>6 Q. By the way, Mr. Oats, are you familiar with 7 any of these documents, this document?</p> <p>8 A. Yes.</p> <p>9 Q. These are your Answers to Interrogatories?</p> <p>10 A. Yes.</p> <p>11 MR. OWENS: All right. That's good. That's 12 good.</p> <p>13 By the way, Mr. Flaxman, do we have one 14 signed by your client?</p> <p>15 MR. FLAXMAN: Yeah.</p> <p>16 MR. OWENS: We don't seem to have a copy signed 17 by Mr. Oats so can -- I'll request on the record, can 18 we get one signed by your client?</p> <p>19 MR. FLAXMAN: I believe I sent it to you because 20 I know he signed it and I didn't want to have this 21 confrontation but, yeah, he signed it.</p> <p>22 MR. OWENS: You're agreeing to send me a signed 23 one, right?</p> <p>24 MR. FLAXMAN: I'll send you a copy.</p>

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">Page 73</p> <p>1 MR. OWENS: Thank you, Mr. Flaxman. 2 All right. So let's go to -- all right. 3 Go down one. Good. Go to 13, please. Nope. Sorry. 4 Go to 8. I'm sorry. Let's go to 7. 5 BY MR. OWENS: 6 Q. Okay. All right. Interrogatory 7 reads, 7 identify each hospital, clinic, institution, either 8 public and/or private, at which plaintiff sought or 9 received treatment whether for physical or 10 psychological disorders of any kind from August 18, 11 2021 to the present. That's what it says, right? 12 A. Yes. 13 Q. And can you get the whole answer. 14 Your answer here is plaintiff is not 15 seeking this type of damages. This request is 16 therefore overbroad and not likely to yield admissible 17 information. That's what it says, true? 18 A. That's what it says, yes. 19 MR. OWENS: Okay. Can we go to the one before 20 so 6 I think. Good. 21 BY MR. OWENS: 22 Q. All right. 6 reads, for each healthcare 23 provider, doctor, medical practitioner, psychiatrist, 24 psychologist, social worker, or other mental health</p>	<p style="text-align: center;">Page 75</p> <p>1 THE WITNESS: Well, yeah, I talked to 2 Ms. Jennifer Bellucci, my medical professional or my 3 medical primary. 4 BY MR. OWENS: 5 Q. Your primary care physician? 6 A. Yes. 7 Q. And it's -- but you're not -- you're not 8 seeking the type of damages referred to in 9 interrogatory 6, correct? 10 A. Yes. 11 Q. You're not seeking damages or recovery for 12 any mental health injury, true? 13 A. True. 14 Q. You didn't receive any physical injury in 15 the incident that is August 18th, 2022, true? 16 A. True. 17 Q. Have you suffered economic injury because of 18 what happened on August 18th, 2020 -- did I say 2022? 19 I'm sorry. Let me -- I made a mistake with the last 20 question. 21 You didn't receive any physical injury 22 or mental health injury based on what happened on 23 August 18th, 2021, correct? 24 A. I did, but I'm not alleging that in this</p>
<p style="text-align: center;">Page 74</p> <p>1 professional whom plaintiff consulted since August 18, 2 2021, describe in complete detail each visit plaintiff 3 made, including the date and length of each visit, the 4 reason for the visit, medication prescribed, if any, 5 the amount charged for the visit, and whether the 6 amount was paid for by insurance. That's what it 7 said, right? 8 A. One moment. Okay. What was the question 9 again? 10 Q. I read it correctly? That's the question. 11 A. No. No. What was the question? You read it 12 correctly, yes. 13 Q. Yeah. Okay. Good. Thank you. 14 And then your answer is plaintiff is not 15 seeking this type of damages, right? 16 A. Yes. 17 Q. All right. Have you visited any mental 18 health professional because of injuries or mental 19 health injury from August 18th, 2021, until the date 20 of this deposition? 21 A. Well, I'm not seeking those type of damages 22 so, you know, why would I need to answer that? 23 MR. FLAXMAN: No. Mr. Oats, you can answer the 24 question.</p>	<p style="text-align: center;">Page 76</p> <p>1 complaint. 2 Q. You're not seeking recovery for it, true? 3 A. True. 4 Q. All right. Have you suffered economic 5 injury based upon what happened on August 18th, 2021? 6 A. Yes. 7 Q. Okay. What economic injury do you seek 8 recovery for? 9 A. Whatever the jury and my attorney deems fit. 10 Q. All right. Did you lose any wages because 11 of this, because of what happened on August 18, 2021? 12 A. I did. 13 Q. Okay. How much, how much money did you 14 lose because -- how much in wages did you lose since 15 August 18th, 2021? 16 A. I could not tell you at this point. I'd have 17 to go through my finances and give you a better answer. 18 MR. OWENS: Mr. Flaxman, I don't see evidence of 19 any economic wage loss. Are you intending to present 20 that? 21 MR. FLAXMAN: We're not -- we're not seeking 22 that. 23 MR. OWENS: Okay. I accept that stipulation. 24 BY MR. OWENS:</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 77	Page 79
<p>1 Q. Have you, have you had to, have you -- 2 you're seeking attorney's fees based on this action, 3 true? 4 A. Are you talking to me or Mr. Flaxman? 5 Q. I'm sorry. You, Mr. Oats. 6 A. Yes. 7 Q. Okay. How much have you had to spend to 8 date since August 18th, 2021? 9 MR. FLAXMAN: Objection, that inquires into 10 attorney-client matters and we won't answer that. 11 MR. OWENS: I don't think the privilege is 12 attorney-client matters. It's communications. If 13 he's got -- if you're seeking attorney's fees and he's 14 incurred attorney's fees to date, I get to know that. 15 How much has he spent? 16 MR. FLAXMAN: I think that interferes, encroaches 17 upon the attorney-client relationship and we're not 18 going to answer that question. 19 BY MR. OWENS: 20 Q. Okay. So, Mr. Oats, I've asked what your 21 attorney fees are -- have been incurred to date from 22 August 18th, 2021. Your attorney, Mr. Flaxman, is 23 instructing you not to answer. Is it your intention 24 to accept your attorney's advice on this matter?</p>	<p>1 have you had to spend? 2 A. And I'm referring it to my attorney. 3 MR. FLAXMAN: Mr. Oats, you can answer that 4 question. 5 THE WITNESS: Well, in that case, I'd have to 6 check my financial records to give you an accurate 7 answer. 8 BY MR. OWENS: 9 Q. What items did you have to spend money on? 10 A. I can refer to my financial records and give 11 you an accurate answer at a different time. 12 Q. Yeah. So I'm not asking what the number is. 13 You had to spend money out of your own pocket because 14 of what happened on August 18, 2021. What were the 15 things that made you -- 16 A. And I will still give you the same answer. 17 COURT REPORTER: I'm sorry. You'll have to 18 repeat your question, Mr. Owens. I couldn't hear it. 19 MR. OWENS: You got it. 20 BY MR. OWENS: 21 Q. Mr. Oats, you've got to let me finish the 22 question. Then you can say what you want. Okay? 23 A. Uh-huh. 24 Q. I'm not asking about how much you spent. I</p>
<p>1 A. It is my intention any question in that 2 advance could be directed towards him. 3 Q. Okay. No problem. 4 A. And I do believe, I do believe it falls under 5 the stipulation of attorney, attorney-client 6 privileges. 7 Q. Okay. For the record -- 8 A. So if you ask me financial, financial records 9 about that, just refer to my attorney. 10 MR. OWENS: But for the record, being precluded 11 out of the deposition, let me get this on the record, 12 we're going to move to bar the claim for attorney's 13 fees and move on. If that changes your mind, I'm 14 happy to hear it. 15 MR. FLAXMAN: If you put that in writing, we'll 16 file a Rule 11 motion if you don't withdraw it within 17 21 days. Go ahead. 18 MR. OWENS: Okay. Thank you. 19 BY MR. FLAXMAN: 20 Q. Have you, have you expended any costs or 21 out-of-pocket expenses because of this litigation? 22 A. That's still a financial question and, yes, 23 but the question can be referred to my attorney. 24 Q. I'm asking you, Mr. Oats. How much money</p>	<p>1 want to know what types of things you had to spend 2 money on based upon what happened on August 18th, 3 2021? 4 MR. FLAXMAN: Let me, let me interpose that we're 5 not seeking those damages here. 6 MR. OWENS: Oh, okay. All right. So absolutely. 7 So I'll propose the following stipulation, if you're 8 not seeking to recover costs as a result of the -- 9 MR. FLAXMAN: No. 10 MR. OWENS: -- the case, I accept. 11 MR. FLAXMAN: The only cost we're seeking to 12 recover are those of the cost of this action as 13 provided by statute and rule. 14 MR. OWENS: Okay. 15 BY MR. OWENS: 16 Q. So the cost as provided incident to this 17 action, what have you spent? 18 A. Are you talking to me? 19 MR. FLAXMAN: We'll stipulate that he hasn't 20 spent anything. 21 MR. OWENS: Thank you. I accept the stipulation. 22 Thanks. 23 (Whereupon, Oats Deposition 24 Exhibit No. 4 was marked for identification.)</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 81	Page 83
<p>1 MR. OWENS: All right. Can I get the docket 2 entries up.</p> <p>3 BY MR. OWENS:</p> <p>4 Q. I have Exhibit 4 coming, coming at you. I 5 have another exhibit coming for you.</p> <p>6 Mr. Oats, my guess is you probably 7 haven't seen this before or maybe you have. Do you 8 know what this is?</p> <p>9 A. No, I don't.</p> <p>10 Q. Okay.</p> <p>11 MR. FLAXMAN: Have you produced this in 12 discovery?</p> <p>13 MR. OWENS: Have we produced this in discovery? 14 No, we haven't. I'll send it to you when we're done.</p> <p>15 MR. FLAXMAN: I would object to it being used 16 because it hasn't been disclosed. Seems like it 17 should have been part of initial disclosures.</p> <p>18 BY MR. OWENS:</p> <p>19 Q. Okay. So do you know if you were in court 20 on April 21, 2022, based on this?</p> <p>21 A. April -- April 21, I -- I don't remember. I 22 could have been. I don't remember now.</p> <p>23 Q. Do you know if you were in court on 24 June 2nd, 2022, based upon this case?</p>	<p>1 Q. Okay. That was probably a good day, right? 2 A. Yes.</p> <p>3 Q. Were you happy when the case was dismissed? 4 A. I was.</p> <p>5 Q. And then the other two court dates you 6 weren't present for as best you recall, right? 7 A. Right.</p> <p>8 Q. So you can't be stressed out about having to 9 go to court when you didn't go to court, right? Is 10 that fair?</p> <p>11 A. I guess.</p> <p>12 Q. Okay.</p> <p>13 A. I know that the summons, if you look at it 14 correctly, did not have my name on it. Did you notice 15 that? Did you notice that the summons doesn't have my 16 birth year on it? Did you notice that the summons, the 17 same one that you're trying to pull up, actually has my 18 son's name on it and had he not shown up to court with 19 me that particular date, he would have had an arrest 20 warrant.</p> <p>21 Q. Okay. So let's take five minutes so we can 22 get it then. Well, actually, wait a second. Back up. 23 Back up.</p> <p>24 So are you saying that you believe the</p>
<p style="text-align: center;">Page 82</p> <p>1 A. I can't remember.</p> <p>2 Q. Do you know if you were --</p> <p>3 A. I may have been. I may have been.</p> <p>4 Q. Do you know if you were in court on 5 June 16th, 2021, because of this case? I'm sorry.</p> <p>6 June 16th, 2022, because of this case, were you there 7 in court?</p> <p>8 A. I think I was, yes.</p> <p>9 Q. Okay. All right. Do you think you attended 10 court for any of the proceedings in this case?</p> <p>11 A. Yes.</p> <p>12 Q. How many times?</p> <p>13 A. Once.</p> <p>14 Q. Okay. Did you come from Wonder Lake to 15 Woodstock?</p> <p>16 A. I did.</p> <p>17 Q. How long did it take you?</p> <p>18 A. About 30, 25, 30 minutes.</p> <p>19 Q. Okay. Was that the day the case was 20 dismissed?</p> <p>21 A. Yes.</p> <p>22 Q. Were you distressed when the case was 23 dismissed?</p> <p>24 A. No.</p>	<p style="text-align: center;">Page 84</p> <p>1 summons that brought you to court did not have your 2 name on it, is that what you said?</p> <p>3 A. It didn't have my name on it.</p> <p>4 Q. And it had somebody else's name?</p> <p>5 A. Yes. So before you get too far into that, my 6 son and me have the same name.</p> <p>7 Q. Is his name Curtis Oats?</p> <p>8 A. It is.</p> <p>9 Q. So if you're saying -- and it said 10 Curtis Oats on the summons?</p> <p>11 A. It does.</p> <p>12 Q. So how is Curtis Oats not your name?</p> <p>13 A. Look real close to the date of birth.</p> <p>14 Q. All right. So it's your belief that the 15 summons was issued in the name of Curtis Oats with 16 your son's date of birth?</p> <p>17 A. That's right, Curtis Oats, Jr. It actually 18 says it on there. And the funny thing is is that he 19 hadn't lived at that address in almost 13 years, well, 20 excuse me, in almost 8 years.</p> <p>21 MR. FLAXMAN: Mr. Oats, wait for another 22 question. He's real good at asking questions.</p> <p>23 Let's take a break.</p> <p>24 MR. OWENS: Well, actually I just have one more</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 85	Page 87
<p>1 here, one more in this -- actually we're almost done. 2 BY MR. OWENS: 3 Q. Was the notice to appear issued in your name 4 or your son's name? 5 A. It was issued in both our names, my name and 6 his name because we share the same name. 7 Q. But then you're saying the notice to appear 8 didn't have his birthday? 9 A. Didn't have my birthday. 10 Q. Did it have his birthday? 11 A. Yes, it had his birthday. 12 Q. The notice to appear did? 13 A. Yes. 14 Q. Did Curtis Oats live there with you in 15 Wonder Lake at that time? 16 A. He did not. He had been moved eight years 17 prior. 18 Q. How do you know that the notice to appear 19 and the summons weren't intended for your son? 20 A. Because my son had not lived at that house in 21 eight years and the prior notices to appear in court 22 had my birthday on it. 23 Q. But not this time, right? 24 A. Not this time.</p>	<p>1 Q. For going into your mailbox? 2 A. Whatever the jury and my attorney decides, 3 that's what it is. 4 Q. I mean, I just want to hear you loud and 5 clear just one more time. You have no idea what it's 6 worth, right, what you think you should get? 7 A. I don't have no idea what it's worth. 8 Whatever the jury and my attorney decides it should be. 9 MR. OWENS: Okay. Mr. Flaxman, is he going to 10 reserve signature or waive? 11 MR. FLAXMAN: We're going to reserve signature. 12 MR. OWENS: Okay. I'll take a PDF mini. 13 MR. FLAXMAN: I have some questions however. 14 MR. OWENS: Oh, great. Okay. 15 EXAMINATION 16 BY MR. FLAXMAN: 17 Q. Mr. Oats. 18 A. Yes. 19 Q. In the complaint which you had on the screen 20 before and I can put it up again if I figure out how 21 to do that -- wrong document, that's -- that's not 22 what I wanted to do. Yeah. Do you see -- maybe it 23 was the right document. I'm sorry. Let me stop. Let 24 me give up.</p>
<p>1 Q. So is it possible that you weren't the 2 person, the subject of the notice? 3 A. No, I was the subject of the notice and -- 4 well, I'll let you ask your question because there's a 5 real good answer for that. 6 Q. Go ahead. Hit me. What's your answer? 7 A. The answer is when I made this notice to the 8 attending judge, he tried to say that, well, it was a 9 mistake of names and whatnot but the funny is is that 10 they had been delivering these letters and everything 11 to me, not my son. They had been -- they figured that 12 they couldn't get me to go to court, they would harass 13 my family members. 14 MR. OWENS: Okay. Why don't we go ahead and take 15 that break that Mr. Flaxman asked for. Five minutes? 16 MR. FLAXMAN: Five minutes is great. 17 (Recess taken.) 18 BY MR. OWENS: 19 Q. Mr. Oats, you're suing the county. What are 20 your damages? 21 MR. FLAXMAN: I didn't hear the question. 22 BY MR. OWENS: 23 Q. What are your damages? 24 A. Whatever the jury were to decide.</p>	<p>1 In the complaint there was -- when the 2 animal control officer was at your door, did he do or 3 say anything that appeared to you that he was trying 4 to come inside the house? 5 A. The tone in which he was talking to me, the 6 accusations of what might happen if I didn't comply 7 with what he was ordering me to do. 8 Q. And did that make you think he was 9 attempting to come into the house? 10 A. Yes. 11 Q. And I think I heard you say that you weren't 12 seeking damages for any emotional upsettedness that 13 resulted from anything in this lawsuit; is that 14 correct? 15 A. Yes, I said that but it was a mistake. 16 Q. What are you seeking damages for? Not how 17 much but what are you seeking damages for? 18 A. I'm seeking damages for my rights being 19 violated, for him making me feel less than a person, 20 his employment making me feel less than a person -- 21 Q. Okay. 22 A. -- when I attempted to complain. 23 Q. Is the animal control person a white person? 24 A. Yes.</p>
	22 (Pages 85 to 88)

Curtis Lamond Oats, Sr.
February 15, 2024

Page 89	Page 91
<p>1 Q. Was there -- the people who own the eight -- 2 or the other dogs in your neighborhood that were 3 barking, were they white people? 4 A. Yes. 5 Q. Did you feel he had been singling you out 6 because of your race? 7 A. Yes. 8 Q. And just to be clear, could you tell us what 9 your race is? 10 A. African American. 11 Q. Okay. And let me try one more screen share. 12 This is the -- this should be the same picture that 13 you were shown before. Do you see it? 14 A. Yes. 15 Q. And there's a -- and I think you said this 16 picture doesn't reflect the way the house and the 17 driveway and the mailbox looked in Dec -- in 2021? 18 A. Correct. 19 Q. And you marked the cursor. I think I'm 20 going to -- I'm going to draw a yellow line where 21 you -- where the cursor was when I heard it. Is that 22 where the mailbox was? 23 A. A little further, a little further towards 24 the middle of the for sale sign but a little more over</p>	<p>1 Q. -- Notice of Public Complaint dated 8/18/21? 2 A. Yes. 3 Q. And at the bottom right it says MC000227? 4 A. Yes. 5 Q. And this is -- this has the name 6 Monica Cosby on it; is that right? 7 A. That is right, yes. 8 Q. And if we go to the previous one, no, 9 the next one which is MC000228, that also has 10 Monica Cosby's name on it; is that right? 11 A. Yes. 12 Q. If we go to the Notice of Ordinance 13 Violation, MC000229, this has your name on it; is that 14 right? 15 A. Yes. 16 Q. And that's the same name as one of your 17 sons? 18 A. Yes. 19 Q. And the only Curtis Oats who lived in 20 Wonder Lake back in 2021 was you; is that right? 21 A. Yes. 22 Q. And it's addressed to Curtis Oats at your 23 address; is that right? 24 A. Yes.</p>
Page 90	Page 92
<p>1 into the grass part or inside the box there is what I 2 was trying to tell the guy. Yeah, like in that area. 3 (Whereupon, Plaintiff's 4 Exhibit No. 1 was 5 marked for identification.) 6 MR. FLAXMAN: Okay. And I marked that as 7 Plaintiff's Exhibit 1 and it's the second yellow line. 8 I don't know how to erase the first one but -- 9 MR. OWENS: Hey, Mr. Flaxman, I see what you're 10 trying to do. Can we just agree that there appears to 11 be an X and then there's like a backwards check. He's 12 referring to the X, not the backwards check. 13 BY MR. FLAXMAN: 14 Q. Is that correct, Mr. Oats? 15 A. Yes. 16 Q. Thank you, sir. 17 A. The X, yes. 18 Q. All right. When you talked about the notice 19 of -- the notice to appear which you said in fact had 20 your son's date of birth on it? 21 A. Yes. 22 Q. Let me show you some documents and ask you 23 some questions about that. I don't know if you can 24 see it on your phone. Is this a -- 25 A. Yes.</p>	<p>1 Q. Does this notice of ordinance violation have 2 a date of birth on it? 3 A. Let me see. 4 Q. Well, do you see where it says sex, M, 5 towards the top? 6 A. Yeah. 7 Q. And to the right of that it says race and 8 race is blank; is that right? 9 A. That's right. 10 Q. And to the right of that, it says DOB which 11 I assume means date of birth. 12 A. Yeah, I can't see it. 13 Q. Is that blank also? 14 A. I can't see it but I'm assuming it is. 15 Q. Okay. Let's look at the next page which is 16 MC000230. Those have two notices of ordinance 17 violations; is that right? 18 A. Yes. 19 Q. And both are in your name; is that right? 20 A. Yes. 21 Q. And neither has a date of birth on it; is 22 that correct? 23 A. Yes. 24 Q. And these both have your address back then</p>

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">Page 93</p> <p>1 in Wonder Lake, Illinois; is that right? 2 A. Yes. 3 Q. Okay. And then the next document is 4 MC000231. Is that a Notice to Appear directed towards 5 Curtis Oats in Wonder Lake, Illinois? 6 A. Yes. 7 Q. Does that have your son's date of birth on 8 it? 9 A. I can't see the date of birth from what I'm 10 looking at. 11 Q. All right. And the next -- and we'll look 12 at MC000 I guess it's 233. It's not visible. That's 13 a Notice to Appear directed to Curtis Oats who lives 14 in Wonder Lake, Illinois. Do you see that? 15 A. Yes. 16 Q. Okay. And that was directed to you; isn't 17 that correct? 18 A. Yes. 19 MR. FLAXMAN: All right. I have nothing further. 20 Thank you.</p> <p style="text-align: center;">FURTHER EXAMINATION</p> <p>21 BY MR. OWENS:</p> <p>22 Q. Mr. Oats, just really briefly, you never 23 complained to the US Equal Employment Opportunity</p>	<p style="text-align: center;">Page 95</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE NORTHERN DISTRICT OF ILLINOIS 3 WESTERN DIVISION 4 Curtis Lamond Oats, Sr.,) 5 Plaintiff,) 6 vs.) No. 22-cv-50113 7 McHenry County, Illinois) 8 McHenry County Animal Control) 9 Officer Doe,) 10 Defendants.) 11 12 735 ILCS Sec. 5/1-109 13 VERIFICATION BY CERTIFICATION 14 I, CURTIS LAMOND OATS, SR., have read the 15 transcript of my deposition given in the above matter 16 on February 15, 2024, consisting of pages 4 through 17 94, inclusive, and under penalties as provided by law 18 pursuant to Section 1-109 of the Code of Civil 19 Procedure do certify that the statements set forth in 20 this deposition transcript are true and correct except 21 as to matters therein stated on information and 22 belief, if any, and as to such matters, I certify as 23 aforesaid that I verify believe the same to be true, 24 as it now appears, including errata sheet entries, if any.</p> <p style="text-align: center;">CURTIS LAMOND OATS, SR.</p> <p>Number of Errata Sheets included _____ If no corrections are made, please initial _____ Dated: _____</p>
<p style="text-align: center;">Page 94</p> <p>1 Commission about any of this; is that true? 2 A. No, I didn't. 3 Q. And you also did not file any complaints to 4 the Illinois Department of Human Rights; is that also 5 true? 6 A. It is, yes. 7 MR. OWENS: I have no further questions. 8 MR. FLAXMAN: We'll reserve signature. 9 --oOo-- 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: center;">Page 96</p> <p>1 ERRATA SHEET 2 I hereby make the following changes to my deposition: 3 PAGE LINE 4 _____ CHANGE: _____ 5 REASON: _____ 6 _____ CHANGE: _____ 7 REASON: _____ 8 _____ CHANGE: _____ 9 REASON: _____ 10 _____ CHANGE: _____ 11 REASON: _____ 12 _____ CHANGE: _____ 13 REASON: _____ 14 _____ CHANGE: _____ 15 REASON: _____ 16 _____ CHANGE: _____ 17 REASON: _____ 18 19 20 CURTIS LAMOND OATS, SR. DATE 21 22 Correction Sheet Page _____ of _____ 23 24</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 97

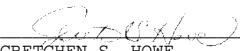
STATE OF ILLINOIS)
) SS.
COUNTY OF McHENRY)

I, GRETCHEN S. HOWE, Certified Shorthand Reporter, do hereby certify that CURTIS LAMOND OATS, SR., was by me first duly sworn, to testify the truth, the whole truth, and nothing but the truth, and that the above deposition, pages 4 through 94, inclusive, was recorded by me and reduced to typewriting by me.

I FURTHER CERTIFY that the foregoing transcript of the said deposition is a true and correct transcript of the testimony given by the said witness at the time and place specified hereinbefore.

I FURTHER CERTIFY that I am not a relative or employee or attorney for counsel of any of the parties, nor a relative or employee of such attorney or counsel, or financially interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office at McHenry, Illinois, this 11th day of March, 2024.



GRETCHEN S. HOWE
Certified Shorthand Reporter
License No. 084-003798



Curtis Lamond Oats, Sr.
February 15, 2024

Page 1

<p style="text-align: center;">A</p> <p>able 50:19 67:16 above-described 59:8 59:13 60:4 absolutely 80:6 accept 61:21 76:23 77:24 80:10,21 access 42:19 accessed 42:8 accessible 42:9,18 accuracy 54:1 accurate 46:9 79:6,11 accusations 88:6 acquitted 6:24 7:16 acting 40:3 action 8:5 9:13 77:2 80:12,17 97:14 actual 60:16 address 4:16 5:13 9:24 56:12 84:19 91:23 92:24 addressed 91:22 admissible 73:16 adult 45:2 advance 78:2 advice 77:24 aforesaid 95:18 afraid 27:21 31:8,9 33:23 34:1,1,3 African 89:10 afternoon 12:1 age 12:24 13:2,3 agencies 28:6 60:21 agency 32:3 aghamilton@mchen... 2:12 agree 28:17 32:13,15 40:16 50:17 60:16 60:19 61:20 62:20 64:2 67:9,11,20 90:9 agreeing 72:22 ahead 32:12 41:4 54:14 59:20,22,24 70:2,3 78:17 86:6,14 Alexus 13:5 allegation 59:8 alleged 9:16 60:15 alleging 75:24 allow 35:3 amendment 8:20 59:10,16 60:5 65:18 American 89:10 amount 74:5,6 and-- 2:9</p>	<p>and/or 73:8 ANDREW 2:9 angle 65:8 angry 33:21 animal 1:7 19:18 22:4 23:7,13 24:21 25:24 28:13,18 30:4 31:21 32:6,13,18 34:9 39:9 39:10 40:4 56:21 58:4 59:2 65:7 68:12,18,19,24 69:10 70:9 88:2,23 95:7 answer 17:19,21 18:1 20:5 33:15 41:5 43:9,12 44:15 45:7 45:10 61:2,11 64:20 64:22 70:16,22,24 71:1 73:13,14 74:14 74:22,23 76:17 77:10,18,23 79:3,7 79:11,16 86:5,6,7 answered 19:22 answers 71:24 72:9 anybody 7:10 23:14 71:12 apart 62:10 apartment 4:18 5:3 apologize 33:9 appear 25:1 46:1,9 85:3,7,12,18,21 90:18 93:4,13 APPEARANCES 2:1 appeared 2:6,12 20:9 88:3 appears 9:3,13 20:10 20:11 21:10 90:9 95:18 apprehension 30:9 approach 22:4 approached 69:7,7 approximate 21:14 approximately 11:21 16:17 17:6 18:24 19:10 49:1 April 81:20,21,21 area 48:10 54:1 90:2 argumentative 44:19 68:1 arrest 6:22 29:22 30:8 30:11 32:19 34:19 83:19 arrested 5:17,20 32:14</p>	<p>asked 36:14 57:11 77:20 86:15 asking 19:5 42:16 44:13 45:5,9 59:18 64:1 71:2,14 78:24 79:12,24 84:22 asleep 18:10 20:7 assist 16:12 ASSISTANT 2:8,9 Associate's 27:15,16 assume 92:11 assumed 35:17,19 assumes 35:14,16,23 assuming 12:15 51:21 92:14 Athletic 25:18 attached 38:17,19,20 41:14 55:10 attaches 58:12 attempt 39:10 attempted 40:6,16 88:22 attempting 25:5 88:9 attended 82:9 attending 86:8 attention 5:7 51:11 attest 58:13 63:1 attorney 2:8,8,9 9:6,9 56:14,23 76:9 77:21 77:22 78:5,9,23 79:2 87:2,8 97:13,13 attorney's 77:2,13,14 77:24 78:12 attorney-client 77:10 77:12,17 78:5 August 5:8 9:16 11:6 11:17,22 13:22 14:10,12 15:8,21 16:2 17:3 18:3,6,24 21:21,22 23:2 40:3,3 46:3,10,18 52:1,3,21 53:1,4 54:19 73:10 74:1,19 75:15,18,23 76:5,11,15 77:8,22 79:14 80:2 authority 40:4 Avenue 2:3,10 4:17 15:15 59:1 awake 20:4,7 awarded 8:6</p>	<p>back 7:13 16:4 22:8 23:1 33:15 34:8 38:10 39:5,15 41:16 44:13 46:19 47:16 47:18,19 50:4 51:14 51:16 52:15,23 53:1 53:5,6,11,13,21,22 54:16 55:7,9 57:10 58:11,19 62:8,9 63:9 63:16 83:22,23 91:20 92:24 background 31:24 backwards 90:10,11 bad 25:23 banging 19:21 33:13 33:13 36:19,19,19 36:20 69:11 bar 78:12 bark 69:10 barking 9:23 22:3,8 23:4,20,21,23,24 28:11,14,16 29:3 30:9,16,23 31:4,6 32:23,24 69:5,7,9 89:3 based 30:9 71:20 75:22 76:5 77:2 80:2 81:20,24 80:2 81:20,24 81:20 82:24 82:25 83:1 83:24 95:18 84:25 95:18 85:1 96:1 86:1 97:1 87:1 98:1 88:1 99:1 89:1 100:1 90:1 101:1 91:1 102:1 92:1 103:1 93:1 104:1 94:1 105:1 95:1 106:1 96:1 107:1 97:1 108:1 98:1 109:1 99:1 110:1 100:1 111:1 101:1 112:1 102:1 113:1 103:1 114:1 104:1 115:1 105:1 116:1 106:1 117:1 107:1 118:1 108:1 119:1 109:1 120:1 110:1 121:1 111:1 122:1 112:1 123:1 113:1 124:1 114:1 125:1 115:1 126:1 116:1 127:1 117:1 128:1 118:1 129:1 119:1 130:1 120:1 131:1 121:1 132:1 122:1 133:1 123:1 134:1 124:1 135:1 125:1 136:1 126:1 137:1 127:1 138:1 128:1 139:1 129:1 140:1 130:1 141:1 131:1 142:1 132:1 143:1 133:1 144:1 134:1 145:1 135:1 146:1 136:1 147:1 137:1 148:1 138:1 149:1 139:1 150:1 140:1 151:1 141:1 152:1 142:1 153:1 143:1 154:1 144:1 155:1 145:1 156:1 146:1 157:1 147:1 158:1 148:1 159:1 149:1 160:1 150:1 161:1 151:1 162:1 152:1 163:1 153:1 164:1 154:1 165:1 155:1 166:1 156:1 167:1 157:1 168:1 158:1 169:1 159:1 170:1 160:1 171:1 161:1 172:1 162:1 173:1 163:1 174:1 164:1 175:1 165:1 176:1 166:1 177:1 167:1 178:1 168:1 179:1 169:1 180:1 170:1 181:1 171:1 182:1 172:1 183:1 173:1 184:1 174:1 185:1 175:1 186:1 176:1 187:1 177:1 188:1 178:1 189:1 179:1 190:1 180:1 191:1 181:1 192:1 182:1 193:1 183:1 194:1 184:1 195:1 185:1 196:1 186:1 197:1 187:1 198:1 188:1 199:1 189:1 200:1 190:1 201:1 191:1 202:1 192:1 203:1 193:1 204:1 194:1 205:1 195:1 206:1 196:1 207:1 197:1 208:1 198:1 209:1 199:1 210:1 200:1 211:1 201:1 212:1 202:1 213:1 203:1 214:1 204:1 215:1 205:1 216:1 206:1 217:1 207:1 218:1 208:1 219:1 209:1 220:1 210:1 221:1 211:1 222:1 212:1 223:1 213:1 224:1 214:1 225:1 215:1 226:1 216:1 227:1 217:1 228:1 218:1 229:1 219:1 230:1 220:1 231:1 221:1 232:1 222:1 233:1 223:1 234:1 224:1 235:1 225:1 236:1 226:1 237:1 227:1 238:1 228:1 239:1 229:1 240:1 230:1 241:1 231:1 242:1 232:1 243:1 233:1 244:1 234:1 245:1 235:1 246:1 236:1 247:1 237:1 248:1 238:1 249:1 239:1 250:1 240:1 251:1 241:1 252:1 242:1 253:1 243:1 254:1 244:1 255:1 245:1 256:1 246:1 257:1 247:1 258:1 248:1 259:1 249:1 260:1 250:1 261:1 251:1 262:1 252:1 263:1 253:1 264:1 254:1 265:1 255:1 266:1 256:1 267:1 257:1 268:1 258:1 269:1 259:1 270:1 260:1 271:1 261:1 272:1 262:1 273:1 263:1 274:1 264:1 275:1 265:1 276:1 266:1 277:1 267:1 278:1 268:1 279:1 269:1 280:1 270:1 281:1 271:1 282:1 272:1 283:1 273:1 284:1 274:1 285:1 275:1 286:1 276:1 287:1 277:1 288:1 278:1 289:1 279:1 290:1 280:1 291:1 281:1 292:1 282:1 293:1 283:1 294:1 284:1 295:1 285:1 296:1 286:1 297:1 287:1 298:1 288:1 299:1 289:1 300:1 290:1 301:1 291:1 302:1 292:1 303:1 293:1 304:1 294:1 305:1 295:1 306:1 296:1 307:1 297:1 308:1 298:1 309:1 299:1 310:1 300:1 311:1 301:1 312:1 302:1 313:1 303:1 314:1 304:1 315:1 305:1 316:1 306:1 317:1 307:1 318:1 308:1 319:1 309:1 320:1 310:1 321:1 311:1 322:1 312:1 323:1 313:1 324:1 314:1 325:1 315:1 326:1 316:1 327:1 317:1 328:1 318:1 329:1 319:1 330:1 320:1 331:1 321:1 332:1 322:1 333:1 323:1 334:1 324:1 335:1 325:1 336:1 326:1 337:1 327:1 338:1 328:1 339:1 329:1 340:1 330:1 341:1 331:1 342:1 332:1 343:1 333:1 344:1 334:1 345:1 335:1 346:1 336:1 347:1 337:1 348:1 338:1 349:1 339:1 350:1 340:1 351:1 341:1 352:1 342:1 353:1 343:1 354:1 344:1 355:1 345:1 356:1 346:1 357:1 347:1 358:1 348:1 359:1 349:1 360:1 350:1 361:1 351:1 362:1 352:1 363:1 353:1 364:1 354:1 365:1 355:1 366:1 356:1 367:1 357:1 368:1 358:1 369:1 359:1 370:1 360:1 371:1 361:1 372:1 362:1 373:1 363:1 374:1 364:1 375:1 365:1 376:1 366:1 377:1 367:1 378:1 368:1 379:1 369:1 380:1 370:1 381:1 371:1 382:1 372:1 383:1 373:1 384:1 374:1 385:1 375:1 386:1 376:1 387:1 377:1 388:1 378:1 389:1 379:1 390:1 380:1 391:1 381:1 392:1 382:1 393:1 383:1 394:1 384:1 395:1 385:1 396:1 386:1 397:1 387:1 398:1 388:1 399:1 389:1 400:1 390:1 401:1 391:1 402:1 392:1 403:1 393:1 404:1 394:1 405:1 395:1 406:1 396:1 407:1 397:1 408:1 398:1 409:1 399:1 410:1 400:1 411:1 401:1 412:1 402:1 413:1 403:1 414:1 404:1 415:1 405:1 416:1 406:1 417:1 407:1 418:1 408:1 419:1 409:1 420:1 410:1 421:1 411:1 422:1 </p>
--	--	---	--

Curtis Lamond Oats, Sr.
February 15, 2024

Page 2

CERTIFICATION 95:12 Certified 1:19 97:6,21 certify 95:16,17 97:7 97:10,12 chain 20:14,17 change 12:1 96:4,6,8 96:10,12,14,16 changed 56:12 changes 78:13 96:2 charged 74:5 charges 24:18,24 27:3 27:4 56:21 check 79:6 90:10,11 Chicago 2:4 6:6 7:6 7:14,18 14:11 15:14 24:8 33:5 58:24 children 12:20,22 children's 13:4 Christina 14:6 15:13 16:15 cite 28:19 citizen 68:20 71:7 City 7:13 24:8 civil 1:17 8:4 95:15 claim 78:12 class 8:5,7 45:2 clear 60:12 62:20 87:5 89:8 clearly 31:18 client 72:14,18 clinic 73:7 close 39:12 84:13 closed 19:6 24:10 36:17 39:14 41:19 closer 48:11 51:7,9 52:24 53:5 closest 51:4 53:12 clue 43:14 coach 70:14,20 coaching 70:13 71:2 Code 95:15 college 27:17,18,19 44:16 45:4 color 40:4 com 23:10 come 13:3 14:15 16:4 16:15,18 27:4 28:6 28:11,14,21 29:7,12 31:20 32:1 33:17 36:14 41:15 42:18 64:23 71:9,9 82:14 88:4,9 comes 17:20 58:12	coming 27:21,24 28:3 32:19 33:24 43:2,3 81:4,4,5 comma 40:20 comment 58:15 Commission 94:1 communications 77:12 Community 27:19 competency 59:19 complain 68:12 70:1 88:22 complained 16:1 93:24 complains 9:15 complaint 7:23 8:11 8:14,20,21 9:4,23 23:20 24:1,2 32:22 39:6 40:2 41:9,9,13 58:20 59:15,19 60:15 76:1 87:19 88:1 91:1 complaints 23:11 32:23 33:10 94:3 complete 74:2 complicated 10:23 comply 88:6 conclude 15:16 conduct 59:9,13 60:4 confrontation 69:19 72:21 confronted 25:24 consider 56:9 considered 24:22 57:13 considering 28:15 consisting 95:14 constitutes 61:6 Constitution 59:11 consulted 74:1 contract 60:8,13,14 60:17,24 61:8,16,18 61:22,24 control 1:7 19:18 22:4 23:7,13 24:22 25:24 28:14,18 30:5 31:21 32:6,13,18 34:9 39:9 39:10 40:4 58:4 59:2 65:7 68:18,19 68:24 69:10 70:9 88:2,23 95:7 controlled 6:19,23 conversation 23:17,18 32:11 34:8 71:20	conversations 32:8 convicted 6:20 Cook 7:8,8,12,20 12:8 copy 57:12 72:16,24 correct 9:10 21:3 22:12,13 28:3 35:12 37:21 38:15,18 40:17 46:11 49:22 65:12 66:19 75:9,23 88:14 89:18 90:13 92:22 93:17 95:16 97:7 customarily 18:15 <hr/> D D 2:7 3:1 damages 73:15 74:15 74:21 75:8,11 80:5 86:20,23 88:12,16 88:17,18 date 4:12 13:18 16:1 21:21 46:18 48:22 74:3,19 77:8,14,21 83:19 84:13,16 90:19 92:2,11,21 93:7,9 96:20 dated 91:1 95:23 dates 83:5 daughter 14:4 daughter's 14:5 69:9 day 10:3 18:7,21,22 19:14 21:23 67:5 82:19 83:1 97:16 days 17:11,15,16 78:17 Dec 89:17 decayed 51:2 deceased 12:16 December 11:18 12:19 deceptive 5:22 decide 86:24 decides 87:2,8 deems 76:9 defendant 40:3 42:7 59:9,14 defendants 1:9 2:12 9:20 95:9 degree 27:12 delivering 86:10 delivery 6:19,23 11:14 Dell 10:17,18 13:6 14:16 Delaney 10:17,18 11:5 13:6 department 6:6 7:14 7:18,21 28:7 29:7 94:4 depends 6:3 18:21	19:14 43:20 depicted 50:1 deposition 1:13 3:14 3:15,15,16 8:15 44:20 45:18 72:3 74:20 78:11 80:23 95:14,16 96:2 97:8 97:10 depositions 1:18 describe 14:18,24 26:5,7 74:2 described 10:1 14:21 14:23 57:16 describing 42:14 description 59:18 detail 17:24 74:2 diabetes 25:22 diabetic 7:24 difference 29:22 30:1 71:13 different 26:24 45:12 64:5 79:11 dimensions 26:6,16,17 direct 5:7 65:19 directed 78:2 93:4,13 93:16 directly 97:14 disability 25:21,22 disabled 25:20 disclosed 81:16 disclosures 81:17 discovery 57:2,5,15 81:12,13 discriminated 69:12 discussing 70:19 Discussion 57:9 dishonesty 5:18 dismissed 82:20,23 83:3 disorders 73:10 distance 21:11,14 distress 65:19 71:20 distressed 65:16 66:3 66:6 67:23 68:4 82:22 District 1:1,1,17 6:9 95:1,1 DIVISION 1:2 95:2 DJ 13:20,21 DOB 92:10 docket 81:1 doctor 73:23 doctors 8:1 document 57:12,14,14
---	---	---	---

Curtis Lamond Oats, Sr.
February 15, 2024

Page 3

<p>61:19 68:10,12 72:7 87:21,23 93:3 documents 68:5,7 72:7 90:21 Doe 1:8 95:8 dog 9:23 13:20,22 14:1,3,12,15,18,19 15:2,17 17:17 22:3 23:20,21,23,24 24:3 24:7 29:17 30:9,16 30:23,24 31:1,4,6,12 31:15 32:2,9,23,24 33:3 34:12 35:9,10 39:13 68:9 69:6,8,8 69:9 dog's 15:4 24:9,14 33:2 dogs 22:9,9,10 28:15 69:4 89:2 doing 58:7,14 door 9:21,21,22 18:11 19:6,21,22 20:10 21:9 23:19,19,22 24:1,10 28:21 29:4 33:13,15 36:17,20 37:3 39:14 41:19 55:10 58:12,17 59:3 62:10 63:7 68:11 69:11 88:2 double 37:15 draw 89:20 Drive 4:24 5:11 driver 18:16,23 driveway 20:23 21:1,5 21:6 38:7,14 47:9 55:4,5 89:17 driving 19:1 20:1 Drove 23:6 drugs 34:4 duly 4:3 97:7 DuPage 12:9 27:18 dwelling 40:5,7,16,21 40:23 41:10 42:7</p>	<p>educated 27:7 effect 24:18 70:13 eight 85:16,21 89:1 either 45:9 73:7 electric 55:20 else's 84:4 emotional 14:14,15 65:19 71:19 88:12 employee 97:13,13 employment 11:9 88:20 93:24 encroaches 77:16 enforcement 32:3 60:21 Enos 40:3,15 42:8 59:9 enter 29:8 39:11 40:6 40:13,16 43:1 60:20 61:4 entered 56:3,17 60:6 entire 71:5,6 entity 7:11 entries 81:2 95:18 envelope 63:14 Equal 93:24 erase 90:7 errata 95:18,22 96:1 essentially 15:17 established 36:1 estate 42:22 evening 11:24 19:3 evenings 12:2 event 9:19 71:5,6 events 9:15 everybody 61:16 65:3 65:3 evidence 56:3,18 76:18 ex 13:8,13 ex-girlfriend 13:10 exact 10:5,11 exactly 29:10 EXAMINATION 3:3 3:4,4 4:5 87:15 93:21 examined 4:3 excuse 12:11 37:8,8 84:20 execute 29:7 executed 31:6 exercised 35:11,21 exhibit 3:14,15,15,16 3:16 8:13,15,18 45:18,20,22,23 46:1</p>	<p>47:23 50:1 72:1,2,3 80:23 81:4,5 90:3,6 existed 43:15 expectation 56:16 57:1 expectations 57:3 expended 78:20 expenses 78:21 expert 57:6 explain 17:24 explained 69:17 express 61:22 extended 22:24 55:2</p>	<p>figure 87:20 figured 86:11 file 24:18,24 27:2,3 33:10 78:16 94:3 film 27:9,10 68:14 finances 76:17 financial 78:8,8,22 79:6,10 financially 97:14 find 31:9 53:10 57:18 fine 24:3 fines 25:1 29:15 finish 79:21 first 4:3,9 30:13 69:20 90:7 97:7 fit 76:9 five 16:23,24 17:4,6 43:8 83:21 86:15,16 Flaxman 2:2,3 3:4 9:6 9:9 10:21,24 31:14 35:13,16,18,23 41:2 41:6,24 43:23 44:18 53:10 56:23 57:1,12 57:17,22 59:17,24 61:13,15,18,24 64:5 65:1 67:24 70:10,14 70:15 71:1,15 72:13 72:15,19,24 73:1 74:23 76:18,21 77:4 77:9,16,22 78:15,19 79:3 80:4,9,11,19 81:11,15 84:21 86:15,16,21 87:9,11 87:13,16 90:5,8,12 93:19 94:8 flesh 24:19 follow 32:22 following 80:7 96:2 follows 4:4 foot 25:13 39:21 45:14 53:7 force 24:9,13,13,22 25:5 27:4 28:8,11 78:13 feet 21:5,18 43:8,11 43:14 44:12,17 45:1 47:2,4 fellow 29:21 felony 5:22 female 26:1 fence 20:14,16,17 22:12,15 fenced 20:19,20 fences 22:16</p>	<p>44:7,12,17 Fourth 59:10,15 60:4 65:18 frame 5:7 19:12 frequently 16:6 17:14 17:15,16 56:11 front 21:9 22:7,24 38:22 47:8,10 51:13 52:24 53:11,12,22 54:16,18 58:12 full 11:19 fully 66:20 funny 84:18 86:9 further 3:4 33:1 46:19 53:21 89:23,23 93:19,21 94:7 97:10 97:12 furthest 51:16 53:13</p>
E				
<p>E 3:1,12 earlier 14:18 early 13:14 18:9 easement 39:3 easily 42:9,17 East 4:24 5:11 economic 75:17 76:4,7 76:19 ED 67:1,3,5,9</p>	<p>examined 4:3 excuse 12:11 37:8,8 84:20 execute 29:7 executed 31:6 exercised 35:11,21 exhibit 3:14,15,15,16 3:16 8:13,15,18 45:18,20,22,23 46:1</p>	<p>93:21 feared 33:6 February 1:14 4:13 95:14 Federal 1:16 9:13 60:19 feel 88:19,20 89:5 fees 77:2,13,14,21 78:13 feet 21:5,18 43:8,11 43:14 44:12,17 45:1 47:2,4 fellow 29:21 felony 5:22 female 26:1 fence 20:14,16,17 22:12,15 fenced 20:19,20 fences 22:16</p>	<p>form 22:12 31:14 35:13 41:2,24 43:23 44:18 67:24 70:10 format 25:8 forth 22:8 95:16 four 43:2,5,5,7,18</p>	<p>go 18:16 29:1 30:12 32:12 34:8 39:5,5 40:19,20 41:4 42:6 44:20 52:16,23 54:14 55:17 57:8,10 58:19 59:7,19,22,24 62:24 70:2,3 72:1 73:2,3,3,4,4,19 76:17 78:17 83:9,9 86:6,12,14 91:8,12 going 8:13 11:12 14:16 24:24 27:1,2,8 28:11,14,19,20 29:4 29:7,9,10,11 30:8,10 30:15,22 31:5,20 33:8,14,17 37:10 41:16,18 43:23 45:6</p>

Curtis Lamond Oats, Sr.
February 15, 2024

Page 4

<p>45:11 57:4 61:2,5 62:18 69:21 72:1 77:18 78:12 87:1,9 87:11 89:20,20 good 10:24 21:17,19 22:22 34:12 36:2 43:10,13 72:11,12 73:3,20 74:13 83:1 84:22 86:5 gout 25:23 government 6:2 7:11 28:6 32:3 60:21 graduate 44:16 45:4,5 grass 90:1 gray 52:17 great 30:18,18 86:16 87:14 greeted 68:13 Gretchen 1:19 97:6,20 guess 41:12 51:12 81:6 83:11 93:12 guessing 58:8 guy 90:2 guys 14:21 55:11 57:5</p> <hr/> <p style="text-align: center;">H</p> <p>H 3:12 hair 26:9 half 4:22 20:6,7 47:2,4 HAMILTON 2:9 47:20 hand 56:4 63:8,15,16 63:17,18 64:15,17 65:7,9,14 97:15 handicapped 44:4 hands 24:16 Hang 55:13 happen 29:9,10,11 88:6 happened 7:17 36:16 54:2 71:21 75:18,22 76:5,11 79:14 80:2 happy 78:14 83:3 harass 86:12 harassing 44:19 hard 13:19 44:9 health 73:24 74:18,19 75:12,22 healthcare 73:22 hear 23:21 31:18 32:17 55:11,11 78:14 79:18 86:21 87:4 heard 88:11 89:21</p> <hr/> <p style="text-align: center;">I</p> <p>idea 87:5,7 identification 3:13 8:16 45:19 72:4 80:24 90:4 identify 73:7 IL 2:4,10 ILCS 95:11 illegal 60:6 61:6 Illinois 1:1,7,16 4:15 4:17 5:1,12 6:10 7:6 33:5 93:1,5,14 94:4 95:1,7 97:1,16 immediately 21:4 48:1 implied 61:18 implying 17:22 improper 44:21 inaccurate 54:3,4</p> <hr/> <p style="text-align: center;">J</p> <p>January 13:17 17:3 18:4 JD 15:6,7,7,18,21 16:2,18 21:22 22:7 23:4 Jennifer 75:2 job 32:22 64:20 70:1</p> <hr/> <p style="text-align: center;">J</p> <p>Jr 10:17,18 11:5 84:17 judge 86:8 judging 55:1 jumped 19:22 June 81:24 82:5,6 junk 56:7,9,10 jury 76:9 86:24 87:2,8</p> <hr/> <p style="text-align: center;">K</p> <p>keep 16:20,20,22 39:13 44:19 45:5,6,9 56:1 69:17 71:2,14 KENNEALLY 2:7 Kenneth 2:2,3 9:6 kept 33:12 56:2 kind 14:1 15:23 22:17 28:17 29:2 39:13 50:17 54:6 73:10 knees 25:23 knew 42:16 43:16 57:4 knf@kenlaw.com 2:5 knock 24:1 28:21 29:4 knocked 18:11 23:19 23:22 knocking 9:21 know 8:18 10:10 13:18,21 14:17 16:7 17:4,21 19:10,11,14 20:5,17,19 22:3,6,7 22:14 23:1 29:22 30:1 31:2 32:16 33:1,6,12,12 35:24 39:1,3 41:17,18 42:1 42:3,4,5,12,13 43:12 44:5,8,9,17,21 45:1 45:8,8,9 47:13 50:7 50:7,14,21 51:8,11 51:19 52:20 53:20 53:23 58:10,11 62:7 62:15 63:2 64:12,14 66:13 67:3 68:3 71:14 72:20 74:22 77:14 80:1 81:8,19 81:23 82:2,4 83:13 85:18 90:7,22 knows 43:21</p> <hr/> <p style="text-align: center;">L</p> <p>L-a-m-o-n-d 4:11 Lake 4:24,24 5:11,11 9:24 12:9 15:8 29:6 82:14 85:15 91:20</p>
--

Curtis Lamond Oats, Sr.
February 15, 2024

Page 5

<p>15:9 50:6 62:10,11 85:14</p> <p>lived 4:21 10:20 11:5 15:7 20:8 51:1 54:18 84:19 85:20 91:19</p> <p>lives 93:13</p> <p>living 4:23 11:7,11 14:10,11 15:21 16:2 58:23,24</p> <p>located 42:9</p> <p>location 12:6 42:12 48:12</p> <p>log 53:18</p> <p>logic 28:20</p> <p>logs 47:14,18 48:2 50:13,20,24 51:4,6,8 51:13 52:4,7 53:1,1 54:5,8</p> <p>long 4:21 5:5 10:20 11:3,5,16 15:4,7,11 16:8 21:13 22:20,23 26:8 34:23 43:21,22 44:3,4 45:6,13,15 55:9 58:4 82:17</p> <p>longest 17:12,13 71:4</p> <p>look 33:14 38:9 39:23 46:7 54:12 55:16 62:15 64:10,11 83:13 84:13 92:15 93:11</p> <p>looked 54:14 63:20 64:3,11,14 65:11,13 89:17</p> <p>looking 37:1 38:2 41:13 49:9 64:17 93:10</p> <p>looks 21:10 46:6 49:12 54:17</p> <p>lose 76:10,14,14</p> <p>loss 76:19</p> <p>lost 28:22</p> <p>loud 87:4</p> <hr/> <p style="text-align: center;">M</p> <p>M 92:4</p> <p>mad 68:17</p> <p>magazine 55:21 56:5 62:16</p> <p>Magistrate 44:21</p> <p>mail 38:10 54:23 55:6 55:7,15,18,18,22,23 56:7,9,10 57:21 60:11 62:21 63:17</p>	<p>64:11,12,13,14,15 64:18 65:6 66:15,19</p> <p>mailbox 24:11 36:21 38:7,9,12,13,15,17 42:8,13,16 43:15,17 46:13,17,20 47:17 48:13,17,20 49:1,11 52:18,21 53:1,11 54:18,21 55:1,11 56:18,21 57:1,11 58:18,21 59:1,11 60:18,21 61:1,11 62:18,21 63:1,11 64:18,21 65:1,11 66:18,21 67:1,11 68:18,21 69:1,11 70:18,21 71:1,11 72:18,21 73:1,11 74:18,21 75:1,11 76:18,21 77:1,11 78:18,21 79:1,11 80:18,21 81:1,11 82:18,21 83:1,11 84:18,21 85:1,11 86:18,21 87:1,11 88:18,21 89:1,11 89:18,21 90:1,11 90:18,21 91:1,11 91:18,21 92:1,11 92:18,21 93:1,11 93:18,21 94:1,11 94:18,21 95:1,11 95:18,21 96:1,11 96:18,21 97:1,11 97:18,21 98:1,11 98:18,21 99:1,11 99:18,21 100:1,11 100:18,21 101:1,11 101:18,21 102:1,11 102:18,21 103:1,11 103:18,21 104:1,11 104:18,21 105:1,11 105:18,21 106:1,11 106:18,21 107:1,11 107:18,21 108:1,11 108:18,21 109:1,11 109:18,21 110:1,11 110:18,21 111:1,11 111:18,21 112:1,11 112:18,21 113:1,11 113:18,21 114:1,11 114:18,21 115:1,11 115:18,21 116:1,11 116:18,21 117:1,11 117:18,21 118:1,11 118:18,21 119:1,11 119:18,21 120:1,11 120:18,21 121:1,11 121:18,21 122:1,11 122:18,21 123:1,11 123:18,21 124:1,11 124:18,21 125:1,11 125:18,21 126:1,11 126:18,21 127:1,11 127:18,21 128:1,11 128:18,21 129:1,11 129:18,21 130:1,11 130:18,21 131:1,11 131:18,21 132:1,11 132:18,21 133:1,11 133:18,21 134:1,11 134:18,21 135:1,11 135:18,21 136:1,11 136:18,21 137:1,11 137:18,21 138:1,11 138:18,21 139:1,11 139:18,21 140:1,11 140:18,21 141:1,11 141:18,21 142:1,11 142:18,21 143:1,11 143:18,21 144:1,11 144:18,21 145:1,11 145:18,21 146:1,11 146:18,21 147:1,11 147:18,21 148:1,11 148:18,21 149:1,11 149:18,21 150:1,11 150:18,21 151:1,11 151:18,21 152:1,11 152:18,21 153:1,11 153:18,21 154:1,11 154:18,21 155:1,11 155:18,21 156:1,11 156:18,21 157:1,11 157:18,21 158:1,11 158:18,21 159:1,11 159:18,21 160:1,11 160:18,21 161:1,11 161:18,21 162:1,11 162:18,21 163:1,11 163:18,21 164:1,11 164:18,21 165:1,11 165:18,21 166:1,11 166:18,21 167:1,11 167:18,21 168:1,11 168:18,21 169:1,11 169:18,21 170:1,11 170:18,21 171:1,11 171:18,21 172:1,11 172:18,21 173:1,11 173:18,21 174:1,11 174:18,21 175:1,11 175:18,21 176:1,11 176:18,21 177:1,11 177:18,21 178:1,11 178:18,21 179:1,11 179:18,21 180:1,11 180:18,21 181:1,11 181:18,21 182:1,11 182:18,21 183:1,11 183:18,21 184:1,11 184:18,21 185:1,11 185:18,21 186:1,11 186:18,21 187:1,11 187:18,21 188:1,11 188:18,21 189:1,11 189:18,21 190:1,11 190:18,21 191:1,11 191:18,21 192:1,11 192:18,21 193:1,11 193:18,21 194:1,11 194:18,21 195:1,11 195:18,21 196:1,11 196:18,21 197:1,11 197:18,21 198:1,11 198:18,21 199:1,11 199:18,21 200:1,11 200:18,21 201:1,11 201:18,21 202:1,11 202:18,21 203:1,11 203:18,21 204:1,11 204:18,21 205:1,11 205:18,21 206:1,11 206:18,21 207:1,11 207:18,21 208:1,11 208:18,21 209:1,11 209:18,21 210:1,11 210:18,21 211:1,11 211:18,21 212:1,11 212:18,21 213:1,11 213:18,21 214:1,11 214:18,21 215:1,11 215:18,21 216:1,11 216:18,21 217:1,11 217:18,21 218:1,11 218:18,21 219:1,11 219:18,21 220:1,11 220:18,21 221:1,11 221:18,21 222:1,11 222:18,21 223:1,11 223:18,21 224:1,11 224:18,21 225:1,11 225:18,21 226:1,11 226:18,21 227:1,11 227:18,21 228:1,11 228:18,21 229:1,11 229:18,21 230:1,11 230:18,21 231:1,11 231:18,21 232:1,11 232:18,21 233:1,11 233:18,21 234:1,11 234:18,21 235:1,11 235:18,21 236:1,11 236:18,21 237:1,11 237:18,21 238:1,11 238:18,21 239:1,11 239:18,21 240:1,11 240:18,21 241:1,11 241:18,21 242:1,11 242:18,21 243:1,11 243:18,21 244:1,11 244:18,21 245:1,11 245:18,21 246:1,11 246:18,21 247:1,11 247:18,21 248:1,11 248:18,21 249:1,11 249:18,21 250:1,11 250:18,21 251:1,11 251:18,21 252:1,11 252:18,21 253:1,11 253:18,21 254:1,11 254:18,21 255:1,11 255:18,21 256:1,11 256:18,21 257:1,11 257:18,21 258:1,11 258:18,21 259:1,11 259:18,21 260:1,11 260:18,21 261:1,11 261:18,21 262:1,11 262:18,21 263:1,11 263:18,21 264:1,11 264:18,21 265:1,11 265:18,21 266:1,11 266:18,21 267:1,11 267:18,21 268:1,11 268:18,21 269:1,11 269:18,21 270:1,11 270:18,21 271:1,11 271:18,21 272:1,11 272:18,21 273:1,11 273:18,21 274:1,11 274:18,21 275:1,11 275:18,21 276:1,11 276:18,21 277:1,11 277:18,21 278:1,11 278:18,21 279:1,11 279:18,21 280:1,11 280:18,21 281:1,11 281:18,21 282:1,11 282:18,21 283:1,11 283:18,21 284:1,11 284:18,21 285:1,11 285:18,21 286:1,11 286:18,21 287:1,11 287:18,21 288:1,11 288:18,21 289:1,11 289:18,21 290:1,11 290:18,21 291:1,11 291:18,21 292:1,11 292:18,21 293:1,11 293:18,21 294:1,11 294:18,21 295:1,11 295:18,21 296:1,11 296:18,21 297:1,11 297:18,21 298:1,11 298:18,21 299:1,11 299:18,21 300:1,11 300:18,21 301:1,11 301:1</p>
---	---

Curtis Lamond Oats, Sr.
February 15, 2024

Page 6

once 16:7 17:2 69:5 82:13 oOo-- 94:9 open 38:9 63:6 64:16 opened 9:21 23:19 55:6 63:8 66:4,19 Opportunity 93:24 opposite 48:16 order 28:8 42:19 45:5 ordering 67:1 88:7 ordinance 69:23 91:12 92:1,16 original 60:15 out-of-pocket 78:21 outrage 69:18 outraged 65:16 66:2,3 66:6 67:22 68:4 69:15,16,18,24 70:7 70:8,11 overbroad 73:16 overnight 18:22 Owens 2:8 3:3,4 4:6 8:11,17,23 9:2 10:24 11:2 31:16,17 35:15 35:17,20 36:2,4 39:23 40:1,12,14 41:3,5,7 42:2 44:1 44:22 45:20,21 47:19,21 48:1,3 53:12,14 57:8,10,19 58:1 59:21 60:2 61:15,21 62:1,3 64:9 65:3,5 68:2 70:12,18 70:21 71:17,18,24 72:5,11,16,22 73:1,5 73:19,21 75:4 76:18 76:23,24 77:11,19 78:10,18 79:8,18,19 79:20 80:6,10,14,15 80:21 81:1,3,13,18 84:24 85:2 86:14,18 86:22 87:9,12,14 90:8 93:22 94:7 owned 14:3	P P.C 2:2 page 3:1 60:24 92:15 96:3,22 pages 95:14 97:8 paid 51:10 74:6 paper 55:10,21 56:5 56:13 62:16 66:11 67:21	papers 33:2,7 34:13 paragraph 39:6,23 40:2 42:6,6,13 58:20 59:7,8 65:15 paranoia 32:2 park 47:7 parkway 38:22 39:1 part 41:21,21 59:13 60:3 81:17 90:1 part-time 11:20 Partially 51:2 particular 19:14 83:19 parties 97:13 partner 55:13 pass 12:18 passed 11:8 12:19 passing 12:15 14:17 PATRICK 2:7 PDF 87:12 penalties 95:15 people 22:8 23:4 28:8 89:1,3 period 18:14 persisted 69:20 person 50:3,4 60:22 86:2 88:19,20,23,23 person's 60:20 pertaining 1:18 phone 62:11 90:23 photo 45:20 46:21 47:19 53:18 photograph 45:22 46:2 47:22 49:4,18 52:4 physical 26:5,16,17 73:9 75:14,21 physician 75:5 picture 27:11 46:24 47:1 50:11 53:24 54:17 55:1 89:12,16 pictures 41:13 piece 55:10,21,22 56:5 56:6,13 57:21 66:11 pieces 38:10 55:6,15 55:18,23 66:15 place 30:13 54:7 68:11 69:18 97:11 plaintiff 1:5 2:6 9:12 40:6 73:8,14 74:1,2 74:14 95:5 plaintiff's 3:16 40:5,7 40:21,23 41:10 42:7 42:8 59:9 90:3,6	plaintiffs 8:6 Play 25:18 please 4:7 64:7 71:16 73:3 95:23 pocket 79:13 point 10:24 20:20 24:6,8 33:3,5,22 36:2,13 40:12 46:12 57:7 58:13 62:7 67:12 76:16 police 6:6 7:14,18 19:21 26:23 27:1,4 27:21,24 28:2,7,11 28:20 29:3,6 31:19 32:1 33:8,11,16,20 33:23 34:2,6,21 69:11 Pomeranian 14:2,20 15:1 28:10,16 29:3 poorly 70:8 porch 24:11 36:21 37:4,6,11,20,24 38:3 38:6,15,16 39:7,15 41:12,14,15,22 55:2 71:20 portion 40:15,22 41:8 51:3,6 possible 86:1 post 58:16 60:8,13,14 60:18 61:1,8,9,10,17 61:22 postmaster 61:19 pounds 25:15 26:14 26:14 practice 5:22 practitioner 73:23 precluded 78:10 prescribed 74:4 present 1:15 23:14 73:11 76:19 83:6 presented 35:14 presumed 35:15 pretty 48:21 66:8 71:7 previous 91:8 previously 10:1 primary 75:3,5 prior 4:23 22:3 49:22 85:17,21 prison 13:15 private 42:8 66:7,8 67:2 73:8 privilege 77:11 privileges 78:6 probably 44:7 81:6	83:1 problem 78:3 problems 14:14,16 Procedure 1:17 95:16 proceeded 33:1 68:10 proceedings 82:10 produce 57:23 produced 57:14,15 81:11,13 production 27:11 professional 74:1,18 75:2 property 38:13 42:17 42:19,21 43:1,17 46:10,23 49:11 69:8 propose 80:7 prosecuted 5:17,21 6:17 provider 73:23 proximate 65:20 psychiatrist 73:23 psychological 73:10 psychologist 73:24 public 42:10 73:8 91:1 pull 62:21 83:17 pulled 47:18 63:9,12 63:14,15,17,23 64:1 purpose 16:12 pursuant 1:16,20 95:15 put 8:11 24:16 38:10 39:20 40:13 42:21 47:19 48:11 55:7 56:21 62:9,9 63:9 64:8 66:13 78:15 87:20 putting 34:4,4 64:17	90:22 94:7 quickly 8:24 quote 40:16
				R race 89:6,9 92:7,8 rambling 67:2 ramifications 17:22 17:23 Randall 14:6,9 range 44:14 read 67:16 74:10,11 95:13 reads 40:2 41:9,10 42:7 65:15 73:6,22 real 8:23 10:23 42:22 84:13,22 86:5 really 13:18 17:19 20:5 26:15 33:16 68:15 93:23 reason 19:23 24:1 61:4 74:4 96:5,7,9 96:11,13,15,17 recall 9:3 32:8 83:6 receive 8:9 75:14,21 received 7:24 23:11 73:9 Recess 86:17 record 57:8,9,10,11 57:13 62:20 72:17 78:7,10,11 recorded 97:9 records 16:20,20,22 57:17 78:8 79:6,10 recover 80:8,12 recovery 75:11 76:2,8 rectangle 50:18,21 reduced 97:9 refer 78:9 79:10 reference 44:10 45:7 referred 12:14 75:8 78:23 referring 59:14 79:2 90:11 reflect 89:16 refresher 45:2,4 refuse 35:11,21 36:7,9 36:12 refusing 61:11 registered 24:5,7 32:10 33:4,4 62:12 regular 17:17,20 relationship 77:17 relative 97:12,13	

Curtis Lamond Oats, Sr.
February 15, 2024

Page 7

remember 6:18 19:20 23:16 25:3,4 26:11 28:4 32:21 35:18 39:12,22 44:5 48:21 48:22 51:18,19 52:5 81:21,22 82:1 Remind 66:10,16 remodeled 46:23 repeat 15:23 79:18 report 58:9 Reporter 1:19 79:17 97:7,21 represent 54:1 request 72:17 73:15 requesting 57:13,15 reserve 87:10,11 94:8 reside 4:14 resided 46:2 residence 10:14 13:17 15:8,9 39:18,21 resident 62:10 rest 38:10 result 6:12,22 7:14 8:3 80:8 resulted 88:13 retaliation 69:23 returned 13:15 ride 11:14 right 11:24 12:14 15:7 19:16 20:21 21:2,10 21:16,21 22:9,11,12 22:15,18 26:16 29:23 30:2,23 31:12 32:17 33:20,24 34:17,19,21,23 35:2 35:7,9,11,21 37:12 37:18,18,23,24 38:1 38:5 40:8 42:6,10,22 45:3,16 46:3,12,17 47:22 48:16 49:7 50:14 51:14,16,22 52:7 53:16,19 54:9 54:22 56:5,18,23 57:19,22 58:3,10 59:3,11 60:18 61:1 61:12,23 62:4,16,19 62:22 63:21 64:3,20 64:21 65:15 66:15 66:20 67:10,17 68:21,23 69:1,13 71:19,22 72:11,23 73:2,2,6,11,22 74:7 74:15,17 76:4,10 80:6 81:1 82:9 83:1	83:6,7,9 84:14,17 85:23 87:6,23 90:17 91:3,6,7,10,14,20,23 92:7,8,9,10,17,19 93:1,11,19 rights 59:9 60:10 68:21,21 88:18 94:4 Rockford 1:16 4:15 4:17 room 22:2 roughly 22:20 26:13 rude 68:15 rule 78:16 80:13 Rules 1:16 running 22:8 39:13 S S 1:19 3:12 97:6,20 Sabrina 13:6 safety 33:6,6 sale 48:9 51:22,24 89:24 saw 38:6,9 54:24 62:24 65:14,16 66:10,22 67:13,21 70:4 saying 20:6 27:24 28:1 46:20 48:4 49:17,20 62:5,23,23 64:6,7 69:17 83:24 84:9 85:7 says 28:18 40:7,10,11 40:15,22 42:10 59:11 65:22 73:11 73:17,18 84:18 91:3 92:4,7,10 scare 36:9,11 scared 25:10 26:15,17 26:21 31:19 34:6 school 11:13 23:1,3 27:8 screen 52:17 87:19 89:11 scroll 8:23 seal 97:16 sealed 66:20 search 29:8 30:2,15 30:22 31:1,4,6,9,16 31:20 32:1,23 33:18 34:9,12,16 35:12,22 35:24 36:5 40:7 57:17 60:6 61:6 62:4 searched 55:6	Sec 95:11 second 12:8 21:20 28:22 36:23 37:8,8,9 52:15 55:14 83:22 90:6 Section 95:15 see 8:1,24 24:3,3,4 33:7,12 38:5,8 40:22 40:23 45:23 46:14 47:22 48:4 50:19 51:13 52:6,14 54:4 54:22 57:17 58:16 59:5 62:7,13,18,21 63:2,11,13 64:15 65:6,8 67:3,9 71:10 71:10 76:18 87:22 89:13 90:8,23 92:3,4 92:12,14 93:9,14 seeing 13:14 60:10 68:5,7 seek 76:7 seeking 73:15 74:15 74:21 75:8,11 76:2 76:21 77:2,13 80:5,8 80:11 88:12,16,17 88:18 seen 49:24 62:18 81:7 seizure 60:6 61:6 62:5 Seminary 2:10 send 24:24 29:11 72:22,24 81:14 sending 29:15 sent 72:19 service 11:14 session 23:1,3 set 95:16 97:15 settled 7:18 settlement 8:9 severe 65:19 71:19 sex 92:4 shaken 36:13 share 85:6 89:11 sheet 95:18 96:1,22 Sheets 95:22 Sheriff 7:12 Sheriff's 7:21 Shore 4:24 5:11 shortest 17:10,11 Shorthand 1:19 97:6 97:21 show 45:22 72:2 90:21 showed 9:21 23:8 showing 30:11 46:9 shown 49:4 52:4	83:18 89:13 shows 28:18 sign 48:9,11,17 51:22 51:24 89:24 signatory 61:10,11 signature 87:10,11 94:8 signed 9:6 61:9,19,20 72:14,16,18,20,21 72:22 significant 13:8,9 single 4:18,20 5:2,4 singling 89:5 sir 9:5 30:17 31:23 45:3 50:19 57:23 90:15 sit 55:8 58:4 sits 58:3 sitting 49:14 situated 49:18 six 43:8 47:2,3 sleeping 19:17,23 smart 29:19,21 smooth 14:15 social 73:24 somebody 60:17 84:4 someplace 32:10 son 10:15 14:14 16:10 16:13 17:20 22:1,2 84:6 85:19,20 86:11 son's 29:13 83:18 84:16 85:4 90:19 93:7 sons 91:17 sorry 35:16 37:9 73:3 73:4 75:19 77:5 79:17 82:5 87:23 sort 50:17 sought 73:8 sounds 6:4 27:7 South 2:3 speak 40:6 speaking 39:9 70:12 specified 97:11 spell 4:9 spend 77:7 79:1,9,13 80:1 spent 77:15 79:24 80:17,20 spoke 23:13 32:7 sports 25:18 Springfield 58:24 Sr 1:4,13 3:2 4:2,8 95:4,13,21 96:20	97:7 SS 97:1 stake 22:18 stand 49:13 standing 64:16 start 9:19 12:3 19:1 19:12,13 33:5 65:1 started 9:23 18:20,22 STATE 97:1 STATE'S 2:8,8,9 stated 95:17 statement 68:16 statements 95:16 states 1:1,17 59:10 60:19 61:3,3 95:1 statute 80:13 stay 16:8,18 staying 16:10 19:19 21:15,22 40:20 stepdaughter 14:7 stepped 39:15,18 steps 42:24 43:2,5,6,7 43:18,18,21,22 44:2 44:7 stipulate 61:15 80:19 stipulation 61:21 62:2 76:23 78:5 80:7,21 stop 8:24 36:23 41:16 64:7,7 71:15 87:23 stopped 13:17 36:19 36:21 55:5 69:5 straight 66:3 street 20:10,24 21:2,7 21:16 37:11,24 43:3 43:15,16 47:5,9,10 51:4,17 53:13,13 stressed 83:8 stretch 28:18,20 29:2 stride 44:6,10 strides 43:20 45:15 strike 6:13 33:9 36:2 stuck 63:8,14 student 27:18 stuff 66:8 67:2,10 subject 31:16 86:2,3 substance 6:19,23 sue 6:5,14 7:10 sued 6:1,4 7:20,20 suffered 65:19 71:19 75:17 76:4 suggest 10:21 53:10 suing 71:12 86:19 suit 8:6 Suite 2:4
--	---	--	---	--

Curtis Lamond Oats, Sr.
February 15, 2024

Page 8

<p>summer 27:14 summon 29:13 summons 29:15,22 30:2,4 83:13,15,16 84:1,10,15 85:19 supervisors 68:13 70:1 supposed 8:1 63:3 sure 10:10 13:18 16:1 16:19,22 17:19 18:8 19:2,9 24:4 27:6 34:12 36:24 39:2 42:20 49:7,16 50:12 60:23 62:19 66:8 69:6 71:8,17,17 Surely 29:21 30:1 surmised 27:22 surprised 23:7 36:14 surprising 30:5 suspend 44:20 sworn 4:1,3 97:7</p> <hr/> <p style="text-align: center;">T</p> <p>T 3:12 tags 24:4 take 27:23 43:1,17 45:4 47:3 62:1 68:15 82:17 83:21 84:23 86:14 87:12 taken 1:14 46:21,24 47:1,17 86:17 talk 32:11 39:17 41:15 69:5 70:18 talked 75:1 90:17 talking 14:22,23 19:7 19:8 49:13 50:14 52:17 54:5 55:13 77:4 80:18 88:5 tall 25:12 26:10 taped 59:2 tcowens@mchenryc... 2:11 television 27:11 tell 4:7 6:13 10:4 21:17,19 22:22 23:16 24:20,20 44:8 46:8 50:19,21 51:10 53:8 54:23 57:6 62:17 63:19,20,22 63:22 64:2,12 65:11 65:13 69:19 71:8 76:16 89:8 90:2 telling 31:19 32:9 41:5 61:3 71:4</p>	<p>ten 16:21 28:15 69:4 tend 28:7 terms 23:18 testified 4:4 testify 97:7 testimony 31:22,23 43:24 61:14 64:2 97:11 Thank 10:24 58:2 73:1 74:13 78:18 80:21 90:15 93:20 Thanks 70:12 80:22 theft 5:21 thing 51:10 52:18,19 58:13 70:4 84:18 things 24:18 27:3 29:15 50:15 79:15 80:1 think 7:21 10:6,8 18:20 19:16,17 24:12 29:9 33:19 43:8,11,12 56:17 68:23 69:2,3,3,12 73:20 77:11,16 82:8 82:9 87:6 88:8,11 89:15,19 third 41:19 thought 29:10 63:11 threaten 32:14 threatened 27:23 threatening 24:17 26:23 three 12:23 17:11,15 17:16 29:14 43:2,4,5 43:7,18,18,22 44:2,6 55:18 tie 22:17 tied 22:7 time 5:7 10:3,4,5,5,11 10:13 11:9,19 12:3,4 13:19 14:17 17:8,9 18:6,15,22,24 19:11 19:24 20:8 22:12 23:2 24:8,9,10 25:15 28:5 38:22 39:16,20 43:1 45:11 49:20 50:7,10 52:16 55:8 58:23 68:11,13 79:11 85:15,23,24 87:5 97:11 timely 8:2 times 16:17,21,23,24 17:6 19:11 28:5,5 82:12</p>	<p>tired 18:21 19:14 today 9:4 told 5:13 17:2 19:16 23:10 27:20 32:5 33:3 43:9 47:4 53:20 63:15 68:5 69:19 70:4 71:3,4 tone 88:5 top 37:16 92:5 totally 33:21 touch 60:11 touched 35:7,8,9,10 transcript 95:14,16 97:10,11 transfer 27:18 trash 60:9 treat 71:10 treated 68:18,19,24 69:2 70:8 71:6,8 treatment 73:9 tree 47:8,8,10,11 52:6 trees 55:8 trial 7:1,3,5 trick 70:15 tried 24:9,12 39:20 69:23 86:8 TROY 2:8 true 5:14 8:21 9:4,7 9:13,14,16 10:1 11:14 12:16 17:8,18 19:19 20:12,15 21:7 21:11,23 23:11 25:8 25:9 26:19 30:23 32:14 34:10 35:5,22 40:10,17 50:5 65:12 65:20,24 68:22 73:17 75:12,13,15 75:16 76:2,3 77:3 94:1,5 95:16,18 97:10 truth 70:17 97:7,8,8 truthfully 18:1 try 27:4 41:16 45:11 45:12 52:16 70:16 89:11 trying 44:14 51:12 64:7 83:17 88:3 90:2,9 turn 28:7 57:2 turned 57:4 two 4:22 9:10 15:12 15:13,17 16:4,9 17:8 17:13,14 37:13,14 43:17 51:13 55:23</p>	<p>type 32:2 44:10 64:12 73:15 74:15,21 75:8 types 80:1 typewriting 97:9</p> <hr/> <p style="text-align: center;">U</p> <p>Uber 11:12,16 12:7 18:14,16 19:1 20:1 uh-huh 10:19,22 17:7 37:2 39:8 49:19 68:7 70:6 79:23</p> <p>Um 52:20</p> <p>understand 5:8 53:15 64:20</p> <p>understanding 42:15 49:17</p> <p>understood 49:8,15</p> <p>United 1:1,17 59:10 95:1</p> <p>university 27:17</p> <p>unsure 12:5 55:17</p> <p>upset 33:21 65:16 66:3,9,11,12,12,13 66:22,24 67:13,21 67:23 68:4,5,8</p> <p>upsettedness 88:12</p> <p>upstairs 22:2</p> <p>use 34:16,21 46:12 56:19</p> <p>usually 14:15 18:17 19:11</p> <p>utility 66:17,23 67:21</p>	<p>visited 19:18 74:17 visiting 15:10,19 visitor 17:17,20 visual 44:9 Vivian 14:9 volume 28:22 vs 1:6 95:6</p> <hr/> <p style="text-align: center;">W</p> <p>wage 76:19 wages 76:10,14 wait 52:15 83:22 84:21</p> <p>waive 87:10 wake 18:7,9 walk 20:9,24 21:9 37:3,10 38:6 44:5</p> <p>walked 23:5,5 41:19 43:16 55:3,4,7</p> <p>walkway 55:3,3,4</p> <p>want 24:19 26:12 27:6 28:7,9 31:18 33:17 42:20,20 49:7,16 50:12 60:23 62:19 66:2 68:15 70:18 71:14 72:20 79:22 80:1 87:4</p> <p>wanted 35:23 87:22</p> <p>warrant 29:8,11,23 30:2,8,11,15,22 31:1 31:4,6,10,16,20 32:1 32:19 34:10,16,18 34:19,20 83:20</p> <p>wasn't 20:19 22:23 51:23,24 52:2 57:3 64:17 66:24 67:16 68:7 69:6</p> <p>way 15:5 17:3 27:6 28:4,12 44:3,4 45:12 48:8,9,16 71:8 72:6 72:13 89:16</p> <p>we'll 57:23 61:20 62:1 78:15 80:19 93:11 94:8</p> <p>we're 9:4 14:22 24:24 41:18 42:20 44:13 57:15 60:23 76:21 76:21 77:17 78:12 80:4,11 81:14 85:1 87:11</p> <p>week 11:21,23</p> <p>weeks 15:12,13,17 16:4,9 17:8,13,14</p> <p>weigh 25:14</p>
--	---	--	--	--

Curtis Lamond Oats, Sr.
February 15, 2024

Page 9

weighed 25:15 weights 25:19 went 24:11 35:2,4,6 36:18,18,20 38:7,10 39:14 54:23 55:17 56:20 60:9,11 62:8,8 63:3,5,9,16 66:7,9 67:6,8 69:22,24 71:5 weren't 67:20 68:3,5 83:6 85:19 86:1 88:11 WESTERN 1:2 95:2 whatnot 8:1 86:9 WHEREOF 97:15 white 20:11 21:5 88:23 89:3 Widowed 12:13 wife 12:16,16 Williams 13:5,6 window 36:18,18,20 37:1,11,15,16,17,20 37:23 38:2 windows 37:13,14 withdraw 78:16 witness 1:15 3:1 4:1 11:1 57:20,24 60:1 64:6 70:14,20 75:1 79:5 97:11,15 woke 20:3 Wonder 4:24 5:11 9:24 15:8 29:6 82:14 85:15 91:20 93:1,5,14 wooden 37:6 49:10 50:14 55:2 Woodstock 2:10 82:15 word 24:13 25:8 34:9 34:16,21 40:13 words 17:18 32:17,20 32:21 42:1,21 56:17 64:8 69:20 work 11:19,24 12:6,7 18:12 worked 11:12,16 12:2 12:7,9 18:14 19:10 worker 73:24 working 12:3 worries 28:24 worth 87:6,7 wouldn't 35:3 50:19 60:10 write 68:10 writing 58:8 78:15	written 60:17 61:24 wrong 15:16 33:9 48:8,8 87:21 wrongful 6:15	17 18:24 18 9:16 13:2 15:21 16:2 18:6 23:2 40:3 46:3,18 52:1 73:10 74:1 76:11 79:14 18th 5:8 11:17 21:22 40:3 52:3 74:19 75:15,18,23 76:5,15 77:8,22 80:2 190 26:14 1970 4:13	4 4 3:3,16 45:1 80:23 81:4 95:14 97:8 45 3:15 4816 4:24 5:11
	X X 3:1,12 90:10,11,16	Y yard 22:7,24 yeah 18:19 19:20 20:17,19 29:20 36:11 48:13,19 49:22 52:19 54:10 64:24,24 67:11 72:15,21 74:13 75:1 79:12 87:22 90:2 92:6,12 year 7:3 48:24 83:16 years 4:22 5:6,16,20 29:14 84:19,20 85:16,21 yellow 21:11,15 89:20 90:6 yield 73:16 young 26:8 younger 26:8 44:6 youngest 13:1,2	5 5 18:20 19:13 25:13 39:23 40:2 45:14 5'5 26:12 5'6 26:12,12 5'7 43:5 5/1-109 95:11 5th 4:13
	Z Zoom 1:14	2 2 3:15 45:18,20,22,23 46:1 47:23 50:1 20 21:5,22 200 2:3 26:14 2009 49:2 201 2:4 2010 49:1,2 2016 11:8,18 12:19 13:16 2018 13:17 2020 75:18 2021 5:8 9:16 11:6,17 11:22 12:7 13:23 14:10,13 15:8,21 16:2,17 18:3,6,15,24 21:22 23:2 40:3 46:3,10,18 52:1,3,21 53:2,4 54:19 73:11 74:2,19 75:23 76:5 76:11,15 77:8,22 79:14 80:3 82:5 89:17 91:20	6 6 25:13 45:14 73:20 73:22 75:9 6'5 43:4 60098 2:10 60604-6107 2:4
	0 06 6:8 07 7:4 084-003798 1:20 97:21	7 7 39:6 42:6,6,13 73:4 73:6 72 3:15 729 4:17 735 95:11	
	1 1 3:14,16 8:13,15,18 10:11 90:3,6 1-109 95:15 10 5:16,20 10:6,7,11 43:11 100 21:18 11 10:9 78:16 11th 97:16 12 19:12 58:20 13 5:6 59:7,8 73:3 84:19 14 5:6 15 1:14 35:1 55:9 58:6 95:14 16th 82:5,6	8 8 3:14 19:13 73:4 84:20 8/18/21 91:1 80 3:16 815-334-4159 2:11 87 3:4	9 90 3:16 90s 13:15 93 3:4 94 95:15 97:8
		3 3 3:15 19:12 72:1,3 30 82:18,18 31 13:3 312-427-3200 2:5 340 25:15	