

EXHIBIT B

Curtis Lamond Oats, Sr.
February 15, 2024

<p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION</p> <p>Curtis Lamond Oats, Sr.,)) Plaintiff,)) vs.)) No. 22-cv-50113 McHenry County, Illinois) McHenry County Animal Control) Officer Doe,)) Defendants.)</p> <p>The deposition of CURTIS LAMOND OATS, SR., taken under oath on February 15, 2024, via Zoom videoconference with the witness being present in Rockford, Illinois, pursuant to the Federal Rules of Civil Procedure of the United States District Court pertaining to the taking of depositions, before Gretchen S. Howe, Certified Shorthand Reporter, License No. 084-003798, pursuant to notice.</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">I N D E X</p> <table> <tr> <th>WITNESS:</th><th>PAGE</th></tr> <tr> <td>CURTIS LAMOND OATS, SR.</td><td></td></tr> <tr> <td>EXAMINATION BY MR. OWENS</td><td>4</td></tr> <tr> <td>EXAMINATION BY MR. FLAXMAN</td><td>87</td></tr> <tr> <td>FURTHER EXAMINATION BY MR. OWENS</td><td>93</td></tr> </table> <p style="text-align: center;">E X H I B I T S</p> <table> <tr> <th>Number</th><th>For Identification</th></tr> <tr> <td>Oats Deposition Exhibit 1</td><td>8</td></tr> <tr> <td>Oats Deposition Exhibit 2</td><td>45</td></tr> <tr> <td>Oats Deposition Exhibit 3</td><td>72</td></tr> <tr> <td>Oats Deposition Exhibit 4</td><td>80</td></tr> <tr> <td>Plaintiff's Exhibit 1</td><td>90</td></tr> </table>	WITNESS:	PAGE	CURTIS LAMOND OATS, SR.		EXAMINATION BY MR. OWENS	4	EXAMINATION BY MR. FLAXMAN	87	FURTHER EXAMINATION BY MR. OWENS	93	Number	For Identification	Oats Deposition Exhibit 1	8	Oats Deposition Exhibit 2	45	Oats Deposition Exhibit 3	72	Oats Deposition Exhibit 4	80	Plaintiff's Exhibit 1	90
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<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 3 KENNETH N. FLAXMAN, P.C., by 4 MR. KENNETH N. FLAXMAN 5 200 South Michigan Avenue 6 Suite 201 7 Chicago, IL 60604-6107 8 312-427-3200 9 knf@kenlaw.com 10 appeared on behalf of the plaintiff; 11 12 PATRICK D. KENNEALLY, 13 McHENRY COUNTY STATE'S ATTORNEY, by 14 MR. TROY OWENS, ASSISTANT STATE'S ATTORNEY 15 --and-- 16 MR. ANDREW HAMILTON, ASSISTANT STATE'S ATTORNEY 17 2200 North Seminary Avenue 18 Woodstock, IL 60098 19 815-334-4159 20 tcowens@mchenrycountyil.gov 21 aghamilton@mchenrycountyil.gov 22 appeared on behalf of the defendants. 23 24 * * * * *</p>	<p style="text-align: right;">Page 4</p> <p>1 (Witness sworn.) 2 CURTIS LAMOND OATS, SR., 3 having been first duly sworn, was examined and 4 testified as follows: 5 EXAMINATION 6 BY MR. OWENS: 7 Q. Please tell us your name. 8 A. Curtis Lamond Oats, Sr. 9 Q. Can you spell all, your first, middle, and 10 last name. 11 A. C-u-r-t-i-s L-a-m-o-n-d O-a-t-s. 12 Q. What's your date of birth? 13 A. February the 5th, 1970. 14 Q. Where do you reside? 15 A. Rockford, Illinois. 16 Q. What's your address? 17 A. 729 Cambridge Avenue in Rockford, Illinois. 18 Q. Is that an apartment or a single family 19 house? 20 A. Single family house. 21 Q. Okay. How long have you lived there? 22 A. Just about two and a half years now. 23 Q. Prior to living there, where did you live? 24 A. 4816 East Lake Shore Drive, Wonder Lake,</p>																						

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Page 5	<p>1 Illinois.</p> <p>2 Q. Is that a single family house or an</p> <p>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</p> <p>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,</p> <p>12 Illinois.</p> <p>13 Q. That's the address you just told me about,</p> <p>14 true?</p> <p>15 A. Yes.</p> <p>16 Q. In the last 10 years, have you been -- have</p> <p>17 you been arrested and prosecuted for any crimes</p> <p>18 involving dishonesty?</p> <p>19 A. No.</p> <p>20 Q. In the last 10 years, have you been arrested</p> <p>21 and prosecuted for any offense such as theft,</p> <p>22 deceptive practice, forgery, or any other felony</p> <p>23 offense?</p> <p>24 A. No.</p>	Page 7	<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</p> <p>9 building.</p> <p>10 Q. Did you sue anybody else, any other</p> <p>11 government entity?</p> <p>12 A. Cook County Sheriff.</p> <p>13 Q. Okay. So let me back up to the City of</p> <p>14 Chicago Police Department. What was the result of</p> <p>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</p> <p>19 court.</p> <p>20 Q. Okay. And then you sued, you sued the Cook</p> <p>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>
Page 6	<p>1 Q. Have you in the -- have you ever sued the</p> <p>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</p> <p>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</p> <p>10 Illinois?</p> <p>11 A. Yes.</p> <p>12 Q. What was the result -- what can -- can you</p> <p>13 tell me -- strike that.</p> <p>14 What did you sue them over?</p> <p>15 A. Malicious prosecution and wrongful</p> <p>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</p> <p>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</p> <p>23 delivery of a controlled substance?</p> <p>24 A. It was acquitted.</p>	Page 8	<p>1 supposed to see certain doctors and whatnot and they</p> <p>2 didn't give it to me in a timely manner.</p> <p>3 Q. Okay. What was the result of that case, the</p> <p>4 civil case?</p> <p>5 A. Every -- it was a class action lawsuit and it</p> <p>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</p> <p>12 the board?</p> <p>13 I'm going to call this Exhibit 1. It</p> <p>14 will be the complaint in this case.</p> <p>15 (Whereupon, Oats Deposition</p> <p>16 Exhibit No. 1 was</p> <p>17 marked for identification.)</p> <p>18 BY MR. OWENS:</p> <p>19 Q. I have before you Exhibit 1. Do you know</p> <p>20 what this is?</p> <p>21 A. It's an amendment to the complaint.</p> <p>22 Q. It's your complaint; is that true?</p> <p>23 A. Yes.</p> <p>24 MR. OWENS: Can you just scroll through real</p> <p>quickly so we can see all of it. Okay. Let me stop</p>

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

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Page 13	<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, Alexis 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>	Page 15
Page 14	<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>	Page 16

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Page 17	<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>	Page 19	<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>
Page 18	<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>	Page 20	<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>

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Page 21	<p>1 would be a driveway to your left if you were facing</p> <p>2 the street; is that right?</p> <p>3 A. That is correct.</p> <p>4 Q. Okay. And then immediately within say</p> <p>5 20 feet of the driveway there's this white house to</p> <p>6 the left of the driveway if you were facing the</p> <p>7 street; is that true?</p> <p>8 A. Yes.</p> <p>9 Q. And if you were to walk out your front door</p> <p>10 and face the right, there appears to be, looks like</p> <p>11 maybe a yellow house some distance away; is that true?</p> <p>12 A. Yes.</p> <p>13 Q. How long would -- how far would you</p> <p>14 approximate the distance between the house you were</p> <p>15 staying in and the yellow house that would be to the</p> <p>16 right if you were facing the street?</p> <p>17 A. I couldn't tell you. I'm not good at math.</p> <p>18 Q. Would you say more than 100 feet?</p> <p>19 A. I couldn't tell you. I'm not good at math.</p> <p>20 Q. Give me a second.</p> <p>21 All right. On this date in August 21,</p> <p>22 20 -- August 18th, 2021, JD was staying with you that</p> <p>23 day, true?</p> <p>24 A. Yes.</p>	Page 23
Page 22	<p>1 Q. Okay. Where was your son?</p> <p>2 A. My son was upstairs in his room.</p> <p>3 Q. Do you know if your dog was barking prior to</p> <p>4 the animal control officer's approach of your house?</p> <p>5 A. Yes.</p> <p>6 Q. What do you know?</p> <p>7 A. I know that JD was tied up in my front yard</p> <p>8 and he was barking with people running back and forth.</p> <p>9 Q. Okay. Dogs do that, right? Dogs do that?</p> <p>10 A. Dogs do that.</p> <p>11 Q. All right. So your house didn't have any</p> <p>12 form of a fence at that time, that's correct, right?</p> <p>13 A. That is correct, yes.</p> <p>14 Q. There was also -- you know what an invisible</p> <p>15 fence is; is that right?</p> <p>16 A. No, no invisible fences.</p> <p>17 Q. So you had him on kind of like a tie out, a</p> <p>18 stake, right?</p> <p>19 A. He was on a leash, yes.</p> <p>20 Q. How long was the leash roughly, the length</p> <p>21 of the leash?</p> <p>22 A. I couldn't tell you. I'm not good with math</p> <p>23 but it was not -- it wasn't very long. It only</p> <p>24 extended to the front yard.</p>	Page 24

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<p style="text-align: right;">Page 25</p> <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 style="text-align: right;">Page 27</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>
<p style="text-align: right;">Page 26</p> <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 style="text-align: right;">Page 28</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>

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Page 29	<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>	Page 31	<p>1 have come 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 come 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	<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>	Page 32	<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>

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Page 33	<p>1 know, nothing to cause further. And he proceeded to</p> <p>2 ask me about the dog's papers.</p> <p>3 At that point, I told him the dog is not</p> <p>4 mine, he's not registered here but he is registered in</p> <p>5 Chicago, Illinois. At that point what made me start</p> <p>6 fearing for, you know, my safety, my home's safety was</p> <p>7 that the gentleman said, well, I have to see his papers</p> <p>8 or I'm going to have to call the police. Well, I said</p> <p>9 that wrong. I apologize. Strike that. He said we</p> <p>10 will file complaints against you is what he said, not</p> <p>11 call the police. And then he said that, he said that,</p> <p>12 you know, I need to see, and, you know, he kept like</p> <p>13 banging and banging at my door.</p> <p>14 So I'm like, look, I'm not even going</p> <p>15 answer the door no more so whether he came back with</p> <p>16 police or not, I really didn't care. I didn't care</p> <p>17 because if they were going to come to my house and want</p> <p>18 to search my house, I've got nothing to hide from them.</p> <p>19 Q. I think you just said whether he came with</p> <p>20 the police or not you didn't care, right?</p> <p>21 A. Yes, because I was totally upset and angry at</p> <p>22 that point.</p> <p>23 Q. So you were not afraid that the police were</p> <p>24 coming? You didn't care, right?</p>	Page 35
Page 34	<p>1 A. Yes, I was afraid. I'm not afraid of the</p> <p>2 police.</p> <p>3 Q. What are you afraid of?</p> <p>4 A. Them putting drugs on me, them putting a case</p> <p>5 on me that has nothing to do with me. It's not the</p> <p>6 police themselves I'm scared of. It's what they can do</p> <p>7 and the courts believe them.</p> <p>8 Q. So we can go back to your conversation, the</p> <p>9 animal control officer never used the word search</p> <p>10 warrant, true?</p> <p>11 A. No, he didn't. He just said that he had to</p> <p>12 search and make sure everything was good with the dog</p> <p>13 and his papers.</p> <p>14 Q. Okay.</p> <p>15 A. He did say that.</p> <p>16 Q. He did not use the word search warrant,</p> <p>17 right?</p> <p>18 A. He didn't say warrant, no.</p> <p>19 Q. He didn't say arrest warrant, right?</p> <p>20 A. He didn't say warrant, no.</p> <p>21 Q. And he didn't use the word police, right?</p> <p>22 A. No, he didn't.</p> <p>23 Q. All right. How long did your interaction</p> <p>24 with the officer last?</p>	Page 36

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

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<p style="text-align: right;">Page 41</p> <p>1 Q. What does that mean?</p> <p>2 MR. FLAXMAN: Objection, form of the question.</p> <p>3 BY MR. OWENS:</p> <p>4 Q. Okay. Go ahead.</p> <p>5 MR. OWENS: Are you telling him not to answer?</p> <p>6 MR. FLAXMAN: Oh, no.</p> <p>7 BY MR. OWENS:</p> <p>8 Q. Okay. So, Mr. Oats, what is -- the portion</p> <p>9 of the complaint that reads, of your complaint that</p> <p>10 reads crossed the curtilage of plaintiff's dwelling,</p> <p>11 what does that mean?</p> <p>12 A. He came onto my porch after I guess getting</p> <p>13 the complaint, and if you are looking at pictures of</p> <p>14 the porch, it actually is attached to the house. So</p> <p>15 when I had to come onto the porch to talk to him, he</p> <p>16 did try to stop me from going back into the house,</p> <p>17 meaning, like, you know, that's when he came across</p> <p>18 with the whole, you know, we're going to do this and do</p> <p>19 that and the third so I closed the door and walked away</p> <p>20 from him.</p> <p>21 Q. So the curtilage part, what part is the</p> <p>22 curtilage? What is -- is that the lawn, the porch,</p> <p>23 what is that?</p> <p>24 MR. FLAXMAN: Object to the form of the question.</p>	<p style="text-align: right;">Page 43</p> <p>1 take at that time to enter onto the property?</p> <p>2 A. Maybe three or four steps if you're coming</p> <p>3 from the curb or coming from the street.</p> <p>4 Q. Okay. So you're a 6'5" man. Is it three or</p> <p>5 four of your steps -- I'm 5'7" -- or three or four of</p> <p>6 my steps?</p> <p>7 A. Three or four of your steps.</p> <p>8 Q. So what do you think, five, six feet?</p> <p>9 A. I couldn't answer that because, like I told</p> <p>10 you, I'm not good in math.</p> <p>11 Q. More than -- you think more than 10 feet?</p> <p>12 A. I think that I don't know how to answer that</p> <p>13 because I'm not good at math.</p> <p>14 Q. So you have no clue how many feet your</p> <p>15 mailbox existed from the street?</p> <p>16 A. I knew if I walked from the street to my</p> <p>17 property where the mailbox is, it will take maybe two,</p> <p>18 three of my steps or three or four of your steps.</p> <p>19 Q. Okay.</p> <p>20 A. Depends on the strides.</p> <p>21 Q. Nobody knows how long your steps are better</p> <p>22 than you. Three of your steps is how long?</p> <p>23 MR. FLAXMAN: I'm going to object to the form of</p> <p>24 the question and the testimony by counsel.</p>
<p style="text-align: right;">Page 42</p> <p>1 He doesn't have to know what those words mean.</p> <p>2 BY MR. OWENS:</p> <p>3 Q. If you don't know, you can say you don't</p> <p>4 know?</p> <p>5 A. Okay. I don't know.</p> <p>6 Q. All right. Go to paragraph 7. Paragraph 7</p> <p>7 reads before leaving plaintiff's dwelling, defendant</p> <p>8 Enos accessed plaintiff's private mailbox that is not</p> <p>9 located on the curb or otherwise easily accessible by</p> <p>10 the public. That's what it says, right?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know what's being -- the location of</p> <p>13 the mailbox in paragraph 7, do you know where that is</p> <p>14 describing?</p> <p>15 A. I'm not understanding the question but if</p> <p>16 you're asking me if I knew where my mailbox was, it was</p> <p>17 on my lawn on my property, not on the curb, not easily</p> <p>18 accessible. You literally have to come onto the</p> <p>19 property in order to access it.</p> <p>20 Q. So I want to make sure we're -- I don't want</p> <p>21 to put words in your mouth. Onto the property,</p> <p>22 meaning the real estate, right?</p> <p>23 A. Yes.</p> <p>24 Q. How many steps do I need -- would I need to</p>	<p style="text-align: right;">Page 44</p> <p>1 BY MR. OWENS:</p> <p>2 Q. When you say three steps, Mr. Oats, how far</p> <p>3 do you get to? It seems like a long way.</p> <p>4 A. No, it's not a long way. I'm handicapped,</p> <p>5 remember? I can't walk too far and I can't, you know,</p> <p>6 do the stride that I was when I was younger. So three</p> <p>7 or four of my steps would probably be about, I don't</p> <p>8 know, I couldn't tell you, from maybe -- actually it's</p> <p>9 hard without having a visual to at least, you know,</p> <p>10 give you some type of reference but I don't stride that</p> <p>11 far.</p> <p>12 Q. So more than four feet?</p> <p>13 A. Okay. And still we're back to the asking me</p> <p>14 mathematics and trying to range something. I can't</p> <p>15 answer that.</p> <p>16 Q. You're almost a college graduate, Mr. Oats.</p> <p>17 You don't know how many four feet are?</p> <p>18 MR. FLAXMAN: Object to the form of the question.</p> <p>19 It's argumentative. And if you keep harassing him</p> <p>20 like that, we will suspend the deposition and go to</p> <p>21 the Magistrate. That's improper and you know it.</p> <p>22 BY MR. OWENS:</p> <p>23 Q. Mr. Oats?</p> <p>24 A. Yes.</p>

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

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Page 49	<p>1 A. I moved into the house in approximately 2010,</p> <p>2 2009, 2010.</p> <p>3 Q. Did you then move the mailbox to where it is</p> <p>4 shown in the photograph?</p> <p>5 A. No, it was moved, it was moved before I moved</p> <p>6 in there.</p> <p>7 Q. All right. I want to make sure I</p> <p>8 understood --</p> <p>9 A. And the mailbox, if I'm looking at this</p> <p>10 correctly, that's a wooden mailbox. The mailbox that</p> <p>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</p> <p>14 sitting on.</p> <p>15 Q. Okay. Understood.</p> <p>16 So I just want to make sure I'm</p> <p>17 understanding what you're saying. Where the mailbox</p> <p>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</p> <p>21 you moved in?</p> <p>22 A. Correct. Yeah, prior to me moving in, it was</p> <p>23 moved, yes.</p> <p>24 Q. Have you ever seen the mailbox where it is</p>	Page 51	<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</p> <p>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</p> <p>7 closer to your house there when you moved in?</p> <p>8 A. They were -- I don't know about the logs</p> <p>9 moved but the mailbox was closer. That's the only</p> <p>10 thing I can tell you about that. I had paid no</p> <p>11 attention to it because, you know.</p> <p>12 Q. I guess what I'm trying to ask is, okay, so</p> <p>13 you can see two lines of landscape logs, one front and</p> <p>14 one back, right?</p> <p>15 A. Yes.</p> <p>16 Q. All right. The one that's back furthest</p> <p>17 away from the street, was that line there if you</p> <p>18 remember?</p> <p>19 A. Well, I can't remember. I know it had</p> <p>20 something like that there.</p> <p>21 Q. Okay. Was the mailbox -- I'm assuming the</p> <p>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>
Page 50	<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</p> <p>4 your household was the person that moved it back,</p> <p>5 true?</p> <p>6 A. I didn't live in the house. I didn't, you</p> <p>7 know, didn't even know the landlady at that time</p> <p>8 neither.</p> <p>9 Q. So --</p> <p>10 A. I had nothing to do -- at the time of this</p> <p>11 picture, I had nothing to do with this house.</p> <p>12 Q. I just want to make sure we got everything</p> <p>13 covered here. Whatever you call the landscape logs,</p> <p>14 you know what I'm talking about, right, the wooden</p> <p>15 things?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. Can we agree that kind of makes sort of a</p> <p>18 broken rectangle?</p> <p>19 A. I wouldn't be able to tell you, sir. I see</p> <p>20 one of the logs moved from there, yes, but I couldn't</p> <p>21 tell you about a broken rectangle or not. I know that</p> <p>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>	Page 52	<p>1 August 18, 2021?</p> <p>2 A. No, it wasn't.</p> <p>3 Q. On August 18th, 2021, were the landscape</p> <p>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</p> <p>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</p> <p>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</p> <p>17 whole screen. Are you talking about the little gray</p> <p>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>

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Page 53	<p>1 landscape logs or the back landscape logs in August</p> <p>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</p> <p>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</p> <p>11 which is the back and which is the front.</p> <p>12 MR. OWENS: I just said the front is closest to</p> <p>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,</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. So and then the landscape log in the photo</p> <p>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</p> <p>21 mailbox when I moved in was further back and it was</p> <p>22 actually in between the front and the back there if</p> <p>23 they were down. I just know that where it is now, it</p> <p>24 was not there when I moved in. And this picture</p>	Page 55	<p>1 A. So judging from the picture you have up,</p> <p>2 there was a wooden porch that extended to a little</p> <p>3 walkway. He walked from the walkway, from the little</p> <p>4 walkway around down towards the driveway, and he walked</p> <p>5 down towards the driveway, he stopped by the mailbox,</p> <p>6 opened it up, searched through a few pieces of mail,</p> <p>7 put the mail back in the mailbox, walked past these</p> <p>8 trees to sit into his car after which time, I'd say</p> <p>9 maybe 15 minutes, if that long, he came back and</p> <p>10 attached a piece of paper to my door.</p> <p>11 I can't hear nobody. Can you guys hear</p> <p>12 me?</p> <p>13 Q. I was just talking to my partner. Hang on</p> <p>14 one second.</p> <p>15 Okay. How many pieces of mail did he</p> <p>16 look at?</p> <p>17 A. I was unsure but when I went out to go get my</p> <p>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</p> <p>21 a magazine or piece of paper that had Ms. Cosby's name</p> <p>22 on it, and the other piece of mail was a letter from a</p> <p>23 cousin I believe. Both the two pieces of mail had my</p> <p>24 name on it though.</p>
Page 54	<p>1 doesn't represent an accuracy of the -- of the area of</p> <p>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</p> <p>5 logs that you're talking about. Okay. When I moved</p> <p>6 in, they were kind of faded out. The mailbox was not</p> <p>7 in the place where it's at now.</p> <p>8 Q. But the logs were faded but they were there,</p> <p>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</p> <p>16 between the front and the back?</p> <p>17 A. In this picture it looks like it's in the</p> <p>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</p> <p>24 saw?</p>	Page 56	<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</p> <p>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</p> <p>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</p> <p>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</p> <p>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</p> <p>17 would be, I think you used the words, entered into</p> <p>18 evidence, right? That's what you said?</p> <p>19 A. Yes, because I had to use it at my hearing</p> <p>20 when I went to McHenry County Courthouse for the</p> <p>21 charges that were put against me for animal cruelty.</p> <p>22 Q. Okay. And by giving it to when you say your</p> <p>23 attorney, you mean Mr. Flaxman, right?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">Page 57</p> <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 style="text-align: right;">Page 59</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 style="text-align: right;">Page 58</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 style="text-align: right;">Page 60</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>

15 (Pages 57 to 60)

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

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

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

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

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Page 77	<p>1 Q. Have you, have you had to, have you --</p> <p>2 you're seeking attorney's fees based on this action,</p> <p>3 true?</p> <p>4 A. Are you talking to me or Mr. Flaxman?</p> <p>5 Q. I'm sorry. You, Mr. Oats.</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How much have you had to spend to</p> <p>8 date since August 18th, 2021?</p> <p>9 MR. FLAXMAN: Objection, that inquires into</p> <p>10 attorney-client matters and we won't answer that.</p> <p>11 MR. OWENS: I don't think the privilege is</p> <p>12 attorney-client matters. It's communications. If</p> <p>13 he's got -- if you're seeking attorney's fees and he's</p> <p>14 incurred attorney's fees to date, I get to know that.</p> <p>15 How much has he spent?</p> <p>16 MR. FLAXMAN: I think that interferes, encroaches</p> <p>17 upon the attorney-client relationship and we're not</p> <p>18 going to answer that question.</p> <p>19 BY MR. OWENS:</p> <p>20 Q. Okay. So, Mr. Oats, I've asked what your</p> <p>21 attorney fees are -- have been incurred to date from</p> <p>22 August 18th, 2021. Your attorney, Mr. Flaxman, is</p> <p>23 instructing you not to answer. Is it your intention</p> <p>24 to accept your attorney's advice on this matter?</p>	Page 79	<p>1 have you had to spend?</p> <p>2 A. And I'm referring it to my attorney.</p> <p>3 MR. FLAXMAN: Mr. Oats, you can answer that</p> <p>4 question.</p> <p>5 THE WITNESS: Well, in that case, I'd have to</p> <p>6 check my financial records to give you an accurate</p> <p>7 answer.</p> <p>8 BY MR. OWENS:</p> <p>9 Q. What items did you have to spend money on?</p> <p>10 A. I can refer to my financial records and give</p> <p>11 you an accurate answer at a different time.</p> <p>12 Q. Yeah. So I'm not asking what the number is.</p> <p>13 You had to spend money out of your own pocket because</p> <p>14 of what happened on August 18, 2021. What were the</p> <p>15 things that made you --</p> <p>16 A. And I will still give you the same answer.</p> <p>17 COURT REPORTER: I'm sorry. You'll have to</p> <p>18 repeat your question, Mr. Owens. I couldn't hear it.</p> <p>19 MR. OWENS: You got it.</p> <p>20 BY MR. OWENS:</p> <p>21 Q. Mr. Oats, you've got to let me finish the</p> <p>22 question. Then you can say what you want. Okay?</p> <p>23 A. Uh-huh.</p> <p>24 Q. I'm not asking about how much you spent. I</p>
Page 78	<p>1 A. It is my intention any question in that</p> <p>2 advance could be directed towards him.</p> <p>3 Q. Okay. No problem.</p> <p>4 A. And I do believe, I do believe it falls under</p> <p>5 the stipulation of attorney, attorney-client</p> <p>6 privileges.</p> <p>7 Q. Okay. For the record --</p> <p>8 A. So if you ask me financial, financial records</p> <p>9 about that, just refer to my attorney.</p> <p>10 MR. OWENS: But for the record, being precluded</p> <p>11 out of the deposition, let me get this on the record,</p> <p>12 we're going to move to bar the claim for attorney's</p> <p>13 fees and move on. If that changes your mind, I'm</p> <p>14 happy to hear it.</p> <p>15 MR. FLAXMAN: If you put that in writing, we'll</p> <p>16 file a Rule 11 motion if you don't withdraw it within</p> <p>17 21 days. Go ahead.</p> <p>18 MR. OWENS: Okay. Thank you.</p> <p>19 BY MR. FLAXMAN:</p> <p>20 Q. Have you, have you expended any costs or</p> <p>21 out-of-pocket expenses because of this litigation?</p> <p>22 A. That's still a financial question and, yes,</p> <p>23 but the question can be referred to my attorney.</p> <p>24 Q. I'm asking you, Mr. Oats. How much money</p>	Page 80	<p>1 want to know what types of things you had to spend</p> <p>2 money on based upon what happened on August 18th,</p> <p>3 2021?</p> <p>4 MR. FLAXMAN: Let me, let me interpose that we're</p> <p>5 not seeking those damages here.</p> <p>6 MR. OWENS: Oh, okay. All right. So absolutely.</p> <p>7 So I'll propose the following stipulation, if you're</p> <p>8 not seeking to recover costs as a result of the --</p> <p>9 MR. FLAXMAN: No.</p> <p>10 MR. OWENS: -- the case, I accept.</p> <p>11 MR. FLAXMAN: The only cost we're seeking to</p> <p>12 recover are those of the cost of this action as</p> <p>13 provided by statute and rule.</p> <p>14 MR. OWENS: Okay.</p> <p>15 BY MR. OWENS:</p> <p>16 Q. So the cost as provided incident to this</p> <p>17 action, what have you spent?</p> <p>18 A. Are you talking to me?</p> <p>19 MR. FLAXMAN: We'll stipulate that he hasn't</p> <p>20 spent anything.</p> <p>21 MR. OWENS: Thank you. I accept the stipulation.</p> <p>22 Thanks.</p> <p>23 (Whereupon, Oats Deposition</p> <p>24 Exhibit No. 4 was</p> <p>marked for identification.)</p>

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Page 81	<p>1 MR. OWENS: All right. Can I get the docket</p> <p>2 entries up.</p> <p>3 BY MR. OWENS:</p> <p>4 Q. I have Exhibit 4 coming, coming at you. I</p> <p>5 have another exhibit coming for you.</p> <p>6 Mr. Oats, my guess is you probably</p> <p>7 haven't seen this before or maybe you have. Do you</p> <p>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</p> <p>12 discovery?</p> <p>13 MR. OWENS: Have we produced this in discovery?</p> <p>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</p> <p>16 because it hasn't been disclosed. Seems like it</p> <p>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</p> <p>20 on April 21, 2022, based on this?</p> <p>21 A. April -- April 21, I -- I don't remember. I</p> <p>22 could have been. I don't remember now.</p> <p>23 Q. Do you know if you were in court on</p> <p>24 June 2nd, 2022, based upon this case?</p>	Page 83	<p>1 Q. Okay. That was probably a good day, right?</p> <p>2 A. Yes.</p> <p>3 Q. Were you happy when the case was dismissed?</p> <p>4 A. I was.</p> <p>5 Q. And then the other two court dates you</p> <p>6 weren't present for as best you recall, right?</p> <p>7 A. Right.</p> <p>8 Q. So you can't be stressed out about having to</p> <p>9 go to court when you didn't go to court, right? Is</p> <p>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</p> <p>14 correctly, did not have my name on it. Did you notice</p> <p>15 that? Did you notice that the summons doesn't have my</p> <p>16 birth year on it? Did you notice that the summons, the</p> <p>17 same one that you're trying to pull up, actually has my</p> <p>18 son's name on it and had he not shown up to court with</p> <p>19 me that particular date, he would have had an arrest</p> <p>20 warrant.</p> <p>21 Q. Okay. So let's take five minutes so we can</p> <p>22 get it then. Well, actually, wait a second. Back up.</p> <p>23 Back up.</p> <p>24 So are you saying that you believe the</p>
Page 82	<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</p> <p>5 June 16th, 2021, because of this case? I'm sorry.</p> <p>6 June 16th, 2022, because of this case, were you there</p> <p>7 in court?</p> <p>8 A. I think I was, yes.</p> <p>9 Q. Okay. All right. Do you think you attended</p> <p>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</p> <p>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</p> <p>20 dismissed?</p> <p>21 A. Yes.</p> <p>22 Q. Were you distressed when the case was</p> <p>23 dismissed?</p> <p>24 A. No.</p>	Page 84	<p>1 summons that brought you to court did not have your</p> <p>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</p> <p>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</p> <p>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</p> <p>15 summons was issued in the name of Curtis Oats with</p> <p>16 your son's date of birth?</p> <p>17 A. That's right, Curtis Oats, Jr. It actually</p> <p>18 says it on there. And the funny thing is is that he</p> <p>19 hadn't lived at that address in almost 13 years, well,</p> <p>20 excuse me, in almost 8 years.</p> <p>21 MR. FLAXMAN: Mr. Oats, wait for another</p> <p>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>

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<p style="text-align: right;">Page 85</p> <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 style="text-align: right;">Page 87</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 style="text-align: right;">Page 86</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 style="text-align: right;">Page 88</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 upsettendness 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>

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

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<div>Page 93</div> <div><div>1in Wonder Lake, Illinois; is that right?</div><div>2A. Yes.</div><div>3Q. Okay. And then the next document is</div><div>4MC000231. Is that a Notice to Appear directed towards</div><div>5Curtis Oats in Wonder Lake, Illinois?</div><div>6A. Yes.</div><div>7Q. Does that have your son's date of birth on</div><div>8it?</div><div>9A. I can't see the date of birth from what I'm</div><div>10looking at.</div><div>11Q. All right. And the next -- and we'll look</div><div>12at MC000 I guess it's 233. It's not visible. That's</div><div>13a Notice to Appear directed to Curtis Oats who lives</div><div>14in Wonder Lake, Illinois. Do you see that?</div><div>15A. Yes.</div><div>16Q. Okay. And that was directed to you; isn't</div><div>17that correct?</div><div>18A. Yes.</div><div>19MR. FLAXMAN: All right. I have nothing further.</div><div>20Thank you.</div><div>21FURTHER EXAMINATION</div><div>22BY MR. OWENS:</div><div>23Q. Mr. Oats, just really briefly, you never</div><div>24complained to the US Equal Employment Opportunity</div></div>	<div>Page 95</div> <div><div>1IN THE UNITED STATES DISTRICT COURT</div><div>2FOR THE NORTHERN DISTRICT OF ILLINOIS</div><div>3WESTERN DIVISION</div><div>4Curtis Lamond Oats, Sr.,)</div><div>5) </div><div>6Plaintiff,)</div><div>7) </div><div>8vs.)</div><div>9) No. 22-cv-50113</div><div>10McHenry County, Illinois)</div><div>11McHenry County Animal Control)</div><div>12Officer Doe,)</div><div>13) </div><div>14Defendants.)</div><div>15</div><div>16735 ILCS Sec. 5/1-109</div><div>17VERIFICATION BY CERTIFICATION</div><div>18</div><div>19I, CURTIS LAMOND OATS, SR., have read the</div><div>20transcript of my deposition given in the above matter</div><div>21on February 15, 2024, consisting of pages 4 through</div><div>2294, inclusive, and under penalties as provided by law</div><div>23pursuant to Section 1-109 of the Code of Civil</div><div>24Procedure do certify that the statements set forth in</div><div>this deposition transcript are true and correct except</div><div>as to matters therein stated on information and</div><div>belief, if any, and as to such matters, I certify as</div><div>aforsaid that I verily believe the same to be true,</div><div>as it now appears, including errata sheet entries, if</div><div>any.</div><div>_____ CURTIS LAMOND OATS, SR.</div><div>Number of Errata Sheets included _____</div><div>If no corrections are made, please initial _____</div><div>Dated: _____</div></div>
<div>Page 94</div> <div><div>1Commission about any of this; is that true?</div><div>2A. No, I didn't.</div><div>3Q. And you also did not file any complaints to</div><div>4the Illinois Department of Human Rights; is that also</div><div>5true?</div><div>6A. It is, yes.</div><div>7MR. OWENS: I have no further questions.</div><div>8MR. FLAXMAN: We'll reserve signature.</div><div>9--oOo--</div></div>	<div>Page 96</div> <div><div>1ERRATA SHEET</div><div>2I hereby make the following changes to my deposition:</div><div>3PAGE LINE</div><div>4_____ CHANGE: _____</div><div>5REASON: _____</div><div>6_____ CHANGE: _____</div><div>7REASON: _____</div><div>8_____ CHANGE: _____</div><div>9REASON: _____</div><div>10_____ CHANGE: _____</div><div>11REASON: _____</div><div>12_____ CHANGE: _____</div><div>13REASON: _____</div><div>14_____ CHANGE: _____</div><div>15REASON: _____</div><div>16_____ CHANGE: _____</div><div>17REASON: _____</div><div>18</div><div>19_____</div><div>20CURTIS LAMOND OATS, SR. DATE</div><div>21</div><div>22Correction Sheet Page _____ of _____</div><div>23</div><div>24</div></div>

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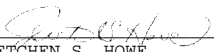
STATE OF ILLINOIS)
) SS.
COUNTY OF McHENRY)

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



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