

UNITED STATES DISTRICT COURT
for the
Northern District of Illinois

Civil Action No. 17-cv-00244

JERRY BOYLE,

Plaintiff(s),

vs.

CITY OF CHICAGO, et al.,

Defendant(s).

DEPOSITION OF
PATRICIA DAVIS

Taken on Behalf of the Plaintiff

DATE TAKEN: August 31, 2017
TIME: 10:00 a.m. - 11:00 a.m.
PLACE: 14 Suntree Place
Viera, Florida

Examination of the witness taken before:

Yvette S. Harrison, RPR, FPR,
Court Reporter
and Notary Public, State of Florida at Large.

King Reporting & Video Conference Center
14 Suntree Place
Viera, Florida 32940
(321) 242-8080 www.kingreporting.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES

APPEARANCES FOR THE PLAINTIFF(S)

MATT TOPIC, ESQUIRE
311 N. Aberdeen, 3rd Floor
Chicago, Illinois 60607
Via Telephone

APPEARANCES FOR THE DEFENDANT(S)

MAGGIE SOBOTA, ESQUIRE
TARA KENNEDY, ESQUIRE
Assistant Corporation Counsel
Department of Law
30 North LaSalle Street, Suite 1230
Chicago, Illinois 60602

ANTHONY DEGLOMINE, III, ESQUIRE
Harris Corporation
1025 West Nasa Blvd.
Melbourne, Florida 32919

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF PROCEEDINGS
DEPOSITION OF PATRICIA DAVIS

	PAGE NO.
DIRECT EXAMINATION BY MR. TOPIC	4
CROSS EXAMINATION BY MS. SOBOTA	24
CERTIFICATE OF OATH	26
CERTIFICATE OF REPORTER	27
ERRATA	28
WITNESS REVIEW LETTER	29

INDEX OF EXHIBITS

PLAINTIFF'S EXHIBITS

NO.	DESCRIPTION	PAGE NO.
1	Affidavit	7
2	Loaner agreement	22

DEFENDANT'S EXHIBITS

NO.	DESCRIPTION	PAGE NO.
	***** NONE *****	

1 WHEREUPON:

2 PATRICIA DAVIS,

3 A witness herein, acknowledged having been duly
4 sworn and testified upon her oath as follows:

5 THE WITNESS: I do.

6 DIRECT EXAMINATION

7 BY MR. TOPIC:

8 Q. Good morning, Ms. Davis. If you could, just
9 state and spell your name, please.

10 A. Patricia Davis, P-A-T-R-I-C-I-A, D-A-V-I-S.

11 Q. And for whom are you employed, Ms. Davis?

12 A. I work for Harris Corporation.

13 Q. How long have you worked at Harris?

14 A. I've been with Harris almost ten years.

15 Q. And what is your current job duties and job
16 title for Harris?

17 A. My job title is return manufacturer
18 authorization representative. And I am the conduit
19 through which customers return equipment for repair or
20 upgrade or routine maintenance.

21 Q. And how long have you had that position?

22 A. I've worked that position for five years.

23 Q. And do you have a basic understanding of the
24 technology that's used in the devices for which you
25 handle the upgrade process?

1 A. I do not.

2 Q. Okay. Have you been deposed before?

3 A. I have.

4 Q. How many times?

5 A. Twice.

6 Q. Okay. And just generally speaking -- let me
7 start with this, were those in the course of your job for
8 Harris?

9 A. No.

10 Q. Okay. So you understand you'll be testifying
11 under oath; correct?

12 A. Yes.

13 Q. It will be important that you understand my
14 questions. So if anything is unclear, just let me know
15 and I will rephrase the question. Okay?

16 A. Okay.

17 Q. Great. And if you answer the question, may I
18 assume that you understood it?

19 A. Yes.

20 Q. Great. Is there anything that would interfere
21 with your ability to provide truthful and accurate
22 testimony today?

23 A. No.

24 Q. Okay. Let's start with the affidavit. Who
25 drafted the affidavit -- do you understand that you

1 signed an affidavit that was submitted in our case?

2 A. I do.

3 Q. Okay. Who drafted that affidavit?

4 A. I don't know.

5 Q. Okay. You did not draft it; correct?

6 A. Correct.

7 Q. Okay. So who presented you with the affidavit?

8 A. Larry Lowman.

9 Q. And who is that?

10 A. An attorney for Harris.

11 Q. And did he explain to you who drafted the
12 affidavit?

13 A. He did not.

14 Q. Did he explain the purpose of the affidavit?

15 A. He did.

16 Q. Okay. What did he tell you about the purpose
17 of the affidavit?

18 MR. DEGLOMINE: I want to -- I'm going to
19 object to the extent that she's going to talk about
20 or discuss any communications between her and
21 counsel for Harris that might be privileged as
22 attorney/client -- as an attorney/client
23 communication.

24 So I don't know, you know, where you're going
25 to go with respect to the communications between her

1 and Larry, but I'm going to instruct her not to
2 respond to the extent that she's going to provide
3 you with any testimony that goes beyond the very
4 basics of here's an affidavit and beyond that
5 nothing else.

6 MR. TOPIC: Okay. Well, are you instructing
7 her not to answer the question?

8 MR. DEGLOMINE: Not that particular question,
9 no.

10 MR. TOPIC: Okay. Could we have the last
11 question read back?

12 (The question was read back.)

13 A. There was a lawsuit with Chicago PD and they
14 required information based upon my job.

15 BY MR. TOPIC:

16 Q. And did he tell you anything about any
17 discussions he had with anyone from the Chicago Police
18 Department or its attorney?

19 A. No.

20 Q. Okay. Why don't we hand you the affidavit
21 that's in question here. If we can have the court
22 reporter mark that as Exhibit 1.

23 (Plaintiff's Exhibit No. 1 was Marked for
24 Identification.)

25

1 BY MR. TOPIC:

2 Q. Ms. Davis, if you want to take a second and
3 review it and let me know when you're ready and then I'll
4 start with some questions.

5 A. Thank you. I'm ready.

6 Q. Okay. Did anyone have a discussion with you
7 about any of the facts that are contained in the
8 declaration before you were presented with the draft
9 declaration?

10 A. I don't understand the question.

11 Q. Sure. So let me back up. You testified that
12 you did not draft the declaration; correct?

13 A. Correct.

14 Q. And it was -- the declaration was presented to
15 you by an attorney for Harris?

16 A. Correct.

17 Q. Okay. Prior to the time that the declaration
18 was presented to you, had that lawyer had any discussions
19 with you about the facts that are in this declaration?

20 A. I was asked by Larry Lowman to provide
21 information regarding this piece of equipment. I
22 provided it to him, he then provided me with the
23 declaration.

24 Q. Got it. Thank you. That's what I was --
25 that's what I was trying to understand. Let's go to

1 paragraph three. You reference overall oversight of
2 Harris' contract with Chicago Police Department with
3 respect to any returns, upgrades or maintenance in the
4 system commonly known as the Stringray; is that correct?

5 A. Yes, sir.

6 Q. Okay. Let me start with this. When you say
7 the system commonly known as the Stringray, what system
8 are you talking about?

9 A. It's a chassis and a laptop.

10 Q. One more time?

11 A. It's a chassis and a laptop.

12 Q. Okay. Could you explain what the chassis is?

13 A. It's a large box that has dials and connectors
14 to it.

15 Q. Can you be more specific as to the model name
16 of the chassis?

17 A. It's called a Stingray.

18 Q. Are you familiar with the device called the
19 Stingray II?

20 A. I am.

21 Q. And do you distinguish between Stingray and
22 Stingray II in the context of your declaration?

23 A. I did not.

24 Q. Okay. So do you know whether the chassis
25 that's referenced in paragraph three is a Stingray or

1 Stingray II?

2 A. It is a Stingray II.

3 Q. Okay. Could you explain further the kinds of
4 upgrades or maintenance that you're referencing in
5 paragraph three?

6 A. I am informed by either a customer or our staff
7 that a product needs to come in for some kind of
8 maintenance, repair or upgrade and I make that happen.

9 Q. And what kind of repairs or upgrades do your
10 responsibilities include?

11 A. Beyond what I just said, I don't know, I'm not
12 technical.

13 Q. Okay. So if, for example, Chicago Police
14 Department needed an upgrade or thought it needed an
15 upgrade, you would not be the person it would speak to
16 about, you know, technically -- the technical issues and
17 whether it needed to be upgraded; is that right?

18 A. That's correct.

19 Q. Who is that person?

20 A. I don't know how to answer the question.

21 Q. So at the Chicago Police Department, who was
22 the person in 2014 or 2015 who would discuss the
23 technical issues related to any upgrades with the Chicago
24 Police Department?

25 A. Their account representative would have.

1 Q. And who is that or who was that, if you know?

2 A. I don't know at the time.

3 Q. Okay. Could you go to paragraph five?

4 A. Yes.

5 Q. When you say the Stingray system, do you mean
6 cell site simulator systems generally or are you limiting
7 it to the Stingray and the Stingray II?

8 A. I am not limiting to just the Stingray or the
9 Stingray II.

10 Q. So could you list for me the other systems or
11 devices that are reflected in the phrase the Stingray
12 system in paragraph five of your declaration?

13 A. The laptop could also require upgrade.

14 Q. Anything else?

15 A. No.

16 Q. How about any handheld devices? Are there any
17 handheld devices that are included within the scope of
18 the Stingray system as used in paragraph five of your
19 declaration?

20 A. Not that I'm aware of.

21 Q. What kinds of upgrades and maintenance are
22 required to insure the continuing functionality of Harris
23 Stingray systems as referenced in paragraph five of your
24 declaration?

25 A. I'm not technical, I don't know those answers.

1 Q. How do you know that Stingray systems require
2 regular upgrade and maintenance to insure continuing
3 functionality?

4 A. Because I'm informed by either our technical
5 people or the customer that the equipment needs to come
6 in.

7 Q. Okay. You don't have any firsthand knowledge
8 that the Stingray system requires regular upgrades and
9 maintenance to insure continuing functionality; is that
10 correct?

11 A. That is correct.

12 Q. Let's turn to paragraph six.

13 A. Okay.

14 Q. I'm sorry, did somebody jump in? There was
15 some background.

16 A. No.

17 Q. Okay. So could you identify for me the Harris
18 records that you reviewed that are referenced in
19 paragraph six of your declaration?

20 A. I maintain various spreadsheets of equipment as
21 it comes in and as I send it back to customers. I also
22 maintain a separate e-mail account of the information as
23 I receive it until a given item is completed. And we
24 have a database of equipment that is sold. I use all of
25 that to make this determination.

1 Q. So first you mentioned -- I'm sorry, did
2 somebody say something?

3 A. No.

4 Q. Okay. I've got some really bad connection.
5 Okay. So the records you referenced for paragraph six
6 were spreadsheets you maintained, you referenced an
7 e-mail account and then you referenced a database of
8 equipment sold. Was there anything else?

9 A. No.

10 Q. What's the name of the spreadsheet that's
11 referenced -- that you reference?

12 A. Excel.

13 Q. And what's the file name?

14 A. Oh, Lord. I can't remember off the top of my
15 head, I'm sorry.

16 Q. Is it specific to Chicago Police Department or
17 is it for all customers --

18 A. It's for -- it's for all customers.

19 Q. And do you just update that spreadsheet in real
20 time as you go?

21 A. Yes.

22 Q. Do you keep all the prior information on the
23 spreadsheet or do you ever delete it or dispose of it,
24 you know, after a period of time?

25 A. I follow Harris' required maintenance for

1 files, whatever that is that allows me to purge, that's
2 what I purge.

3 Q. And as of the time in which you -- or with
4 which you signed this declaration, had you purged any
5 records from the database about upgrades to Chicago
6 Police Department's Stingray systems?

7 A. No.

8 Q. And hadn't done so since then?

9 A. No.

10 Q. What kind of details are maintained on that
11 spreadsheet as relates to the Chicago Police Department
12 upgrade we're talking about?

13 A. Customer name, product, serial number, date
14 received, date returned.

15 Q. Is there a record of what upgrade is being
16 performed?

17 A. Not by me.

18 Q. Okay. And by whom is that record kept?

19 A. I don't know if there is one.

20 Q. Who would be the most likely person based on
21 your experience, who would keep such a record if it
22 existed?

23 MR. DEGLOMINE: I'm sorry, are you talking
24 about a particular point in time or just in general?

25 MR. TOPIC: Thanks, I'll clarify.

1 BY MR. TOPIC:

2 Q. So based on your experience, who do you think
3 is the most likely person who would have records about
4 what upgrades was performed for Chicago Police Department
5 in early 2015?

6 A. Jackie Rubel.

7 Q. Could you spell the first and last name for me,
8 please?

9 A. J-A-C-K-I-E, R-U-B-E-L.

10 Q. And is it Mr. or Ms. Rubel?

11 A. Ms.

12 Q. Is Ms. Rubel still employed by Harris?

13 A. She is.

14 Q. Let's go to paragraph seven.

15 A. Okay.

16 Q. What are the major essential components of CPD
17 systems that are referenced in paragraph seven?

18 A. The chassis and the laptop.

19 Q. Was it your understanding both were being
20 upgraded?

21 A. No, I can't say that. They both came in.

22 Q. And do you know who was responsible for
23 performing the upgrade?

24 A. No, I don't.

25 Q. Who do you think is the most likely person

1 based on your experience who would know the answer to
2 that question?

3 A. Bear with me, I'm trying to think back in 2014.
4 I don't know. I can't go back that far.

5 Q. Okay. And then in paragraph eight you say
6 Harris returned the essential components, the CPE system
7 to CPD. Were there any additional components that were
8 sent or just the same components after they were
9 upgraded?

10 A. I -- no, wait a minute.

11 Q. I'm sorry?

12 A. I believe there were additional components
13 sent.

14 Q. And what were those?

15 A. I don't remember off the top of my head.

16 Q. Are those reflected in the spreadsheet or other
17 records that you referenced earlier?

18 A. Yes.

19 Q. Let's just go back actually to paragraph six.
20 You had mentioned the spreadsheet. You also said that
21 you maintain an e-mail account about upgrades until
22 they're completed. Do you recall that testimony?

23 A. Yes.

24 Q. What do you mean by e-mail account?

25 A. I receive an e-mail through my business account

1 for Harris from customers indicating they require
2 assistance. I respond, I maintain that until I'm through
3 so that I can have it for reference in the future.

4 Q. Okay. So it -- you don't have a specific
5 e-mail account for each upgrade? Are you saying you keep
6 the e-mails that you receive in the course of discussing
7 an upgrade?

8 A. Correct.

9 Q. Okay. And have you retained all the e-mails
10 related to the Chicago Police Department upgrade that's
11 referenced in your affidavit?

12 A. I believe so.

13 Q. Okay. And are those maintained like in a
14 specific folder or how do you maintain them?

15 A. I have subcategories within my e-mail that I
16 maintain these.

17 Q. And did you exchange e-mails with anyone at
18 Chicago Police Department about the upgrade that's
19 referenced in your affidavit?

20 A. Yes.

21 Q. And with what people did you exchange those
22 e-mails?

23 A. Sergeant Costa.

24 Q. Anyone else?

25 A. Not that I remember.

1 Q. Did you have any e-mails internally at Harris
2 about the upgrade?

3 A. Yes.

4 Q. And with whom did you exchange those e-mails?

5 A. Jackie Rubel.

6 Q. Anyone else?

7 A. I don't think so.

8 Q. Did you exchange any e-mails with anyone else
9 about the Chicago Police Department upgrade that's
10 referenced in your declaration?

11 A. I don't think so.

12 Q. I asked that, you said you don't think so. Are
13 you -- are you not certain?

14 A. That's correct.

15 Q. Okay. So it is possible that you have e-mails
16 you exchanged with people other than Sergeant Costa or
17 Jackie Rubel about CPD's upgrade?

18 A. Yes, it's possible.

19 Q. At any point did anyone ask you to search for
20 any documents related to this upgrade?

21 A. I was asked by Larry Lowman to research the
22 history of this piece for this affidavit.

23 Q. Did he ask you to provide him with copies of
24 any of the relevant document?

25 A. I don't recall if he asked.

1 Q. Did you provide him with any of the documents
2 related to the upgrade?

3 A. I believe I did.

4 Q. And the document that you provided to him, did
5 it include the spreadsheet that you referenced, all of
6 the e-mails you referenced and anything from the database
7 of equipment sold that you had referenced earlier?

8 A. It included -- it included the request for the
9 upgrade, the shipping, the shipping document that it went
10 back to the customer, the e-mail between Sergeant Costa
11 and I. I don't have a way to send the database, so
12 nothing from the database would have been included.

13 Q. Did you provide him with the e-mails between
14 maybe you and Ms. Rubel?

15 A. I don't think so.

16 Q. Okay. Let's go to -- actually in paragraph
17 seven and paragraph eight you refer to components as
18 essential. How do you know that those components were
19 essential?

20 A. In that they are the unit.

21 Q. So by essential do you mean essential to the
22 operation of the specific system that's being referenced?

23 A. Yes.

24 Q. And do you know if Chicago Police Department --
25 let me just start with this. Do you know whether Chicago

1 Police Department in January of 2015 was in possession of
2 any handheld cell site simulator devices?

3 A. I am not.

4 Q. And do you know whether the components that CPD
5 shipped to Harris as referenced in your declaration would
6 have been essential to the operation of any handheld cell
7 site simulator devices that are manufactured by Harris or
8 were at that time?

9 A. I am not.

10 Q. Let's go to paragraph nine.

11 A. Okay.

12 Q. How did you conclude that CPD would not have
13 been able to deploy or utilize that CPD system after
14 shipping the components to Harris?

15 A. Because I had them until such time as I
16 returned them.

17 Q. Understood. Do you know whether CPD had any
18 other cell site simulator systems during the time that it
19 had sent these components to Harris?

20 A. I don't.

21 Q. Do you know whether Harris has sold other cell
22 site simulator equipment to Chicago Police Department
23 prior to the time that this equipment was sent back to
24 Harris?

25 A. They own their own equipment. What it is I

1 don't know.

2 Q. I'm sorry, did you say -- have you answered?
3 Did I miss it?

4 A. I'm sorry. I said I know they own other
5 equipment, I don't know the details of what that is.

6 Q. Are there any databases that you have access to
7 at Harris that would show all of the cell site simulator
8 equipment that had been sold to CPD as of or earlier than
9 December 22nd, 2014?

10 A. Yes.

11 Q. Could you just tell me the name of that system?

12 A. I simply call it the database. If there's a
13 formal name, I don't know what it is.

14 Q. Is that the same database you had referenced
15 earlier when you were talking about the records that you
16 had looked at in the course of preparing the declaration?

17 A. It is.

18 Q. And so it's possible to search that database to
19 generate a list of all the equipment that Harris has sold
20 to the Chicago Police Department; is that correct?

21 A. Yes.

22 Q. To the best of your knowledge, if Harris had
23 previously sold another Stingray device to Chicago Police
24 Department and another laptop, would the fact that CPD
25 sent you the system that it sent you in December of 2014

1 impact CPD's ability to use such other systems?

2 A. I don't know.

3 Q. And then in paragraph nine when you say CPD
4 would not have been able to deploy or use that system, am
5 I correct you're just basing that on the fact that CPD
6 did not have possession of the system at that time?

7 A. Correct.

8 MR. TOPIC: Let's mark the next exhibit,
9 please.

10 (Plaintiff's Exhibit No. 2 was Marked for
11 Identification.)

12 BY MR. TOPIC:

13 Q. And once you received it and had a chance to
14 look at it, let me know and then I'll start asking
15 questions.

16 A. Okay.

17 Q. All right. Do you recognize this document?

18 A. No.

19 Q. Do you know anything about whether Harris sent
20 a loaner Stingray device to Chicago Police Department in
21 approximately this time period?

22 A. I do.

23 Q. Okay. And did Harris provide a loaner device
24 to Chicago Police Department in this time period?

25 A. They did not.

1 Q. And how do you know that?

2 A. I would have been the one to provide it and
3 according to my records I didn't.

4 Q. Do you have any independent recollection about
5 that?

6 A. No.

7 Q. Just a second. Okay. Beyond what's disclosed
8 in your declaration, do you have any other knowledge
9 about the upgrade to the CPD Stingray system that's
10 referenced in the declaration?

11 A. No.

12 Q. What did you do to prepare for your deposition
13 today?

14 A. I reviewed the deposition and I spoke to one of
15 our in-house counsel.

16 Q. And I'm not going to ask you to tell me the
17 discussions with that in-house counsel, but can you just
18 identify who that is?

19 A. Anthony Deglomine. I hope I'm pronouncing that
20 right.

21 MR. DEGLOMINE: Deglomine.

22 BY MR. TOPIC:

23 Q. Was anyone else present for those discussions?

24 A. No.

25 Q. Have you had any discussions with the City of

1 Chicago attorneys who are involved in this case?

2 A. I said good morning this morning.

3 Q. Other than -- I was going to say other than any
4 pleasantries, have you had any discussion with any City
5 of Chicago lawyers about the substance of your
6 declaration or about this case?

7 A. No.

8 Q. That might be all my questions. Can I ask
9 let's just take a five minute break and I'll call back
10 in?

11 (A break was taken.)

12 MR. TOPIC: Ms. Davis, thank you for your time.
13 I do not have any further questions.

14 THE WITNESS: Thank you.

15 MS. SOBOTA: I just have a couple of follow-up,
16 Matt.

17 CROSS EXAMINATION

18 BY MR. TOPIC:

19 Q. Ms. Davis, are you aware in the time period
20 2014 and earlier whether Harris ever manufactured a
21 handheld device that could function independently as a
22 cell site simulator?

23 MR. TOPIC: Objection, lack of foundation.
24 She's already testified she doesn't know what the
25 equipment does.

1 MR. DEGLOMINE: You can answer the question if
2 you understand it.

3 A. I don't know.

4 BY MS. SOBOTA:

5 Q. Are you aware if CPD ever had such a system, if
6 it existed?

7 A. I am not aware.

8 MS. SOBOTA: That's all that I have.

9 MR. TOPIC: I don't have any follow-up.

10 MR. DEGLOMINE: We will read.

11 (The reading and signing of the deposition were
12 reserved.)

13 (The deposition was concluded at 11:00 a.m.)

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF BREVARD)

I, YVETTE S. HARRISON, RPR, FPR,
the undersigned authority, hereby
certify that the witness

PATRICIA DAVIS

was duly sworn by me.

WITNESS MY HAND AND OFFICIAL SEAL

this 31st day of August 2017

at Melbourne, Florida.



YVETTE S. HARRISON, RPR
Notary Public, State of Florida at Large
Certificate No. CC717086
My Commission Expires: November 17, 2017

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF BREVARD)

I, YVETTE S. HARRISON, Registered Professional Reporter, Florida Professional Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of PATRICIA DAVIS; that a review of the transcript was requested; and that the foregoing transcript, pages 1 through 27, inclusive, are a true and correct record of my stenographic notes.

I further certify that I am not a relative, employee, or attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 5th day of September 2017.



YVETTE S. HARRISON
Registered Professional Reporter
Florida Professional Reporter

1 PATRICIA DAVIS; August 31, 2017

2 ERRATA

3 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

4 IN RE: BOYLE V. CITY OF CHICAGO

5 CASE NO: 17-cv-00244

6 Page & Line
7 Number

CHANGE

REASON

Page & Line Number	CHANGE	REASON
7	-----	-----
8	_____	_____
9	_____	_____
10	_____	_____
11	_____	_____
12	_____	_____
13	_____	_____
14	_____	_____
15	_____	_____
16	_____	_____
17	_____	_____
18	_____	_____
19	_____	_____
20	_____	_____

21 Under penalties of perjury, I declare that I have
22 read my deposition and that it is true and correct
23 subject to any changes in form or substance
24 entered here.

25 Dated: _____ PATRICIA DAVIS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
for the
Northern District of Illinois

Civil Action No.: 17-cv-00244

JERRY DOYLE,

Plaintiff(s),

VS.

CITY OF CHICAGO, et al.,

Defendant(s).

_____ /

IN RE: DEPOSITION OF PATRICIA DAVIS

TAKEN August 31, 2017

DATE SENT TO WITNESS: _____

TO: PATRICIA DAVIS C/O ANTHONY DEGLOMINE, III, ESQUIRE
1025 W. Nasa Blvd.
Melbourne, FL 32919

The referenced transcript has been completed and awaits reading and signing.

Please arrange to stop by our office at 14 Suntree Place, Suite 101, Viera, Florida to read and sign the transcript. Office hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday. The transcript is 28 pages long, and you should allow yourself sufficient time.

If the reading and signing have not been completed prior to _____, 2017, we shall conclude that you have waived the reading and signing of the transcript.

Thank you.
Yvette S. Harrison

CC: ANTHONY DEGLOMINE, III, Esquire
MAGGIE SOBOTA, Esquire

A	27:10,11 attorney/client 6:22,22 attorneys 24:1 August 1:15 26:14 28:1 29:10 authority 26:9 authorization 4:18 authorized 27:6 awaits 29:14 aware 11:20 24:19 25:5,7	call 21:12 24:9 called 9:17,18 case 6:1 24:1,6 28:5 CC 29:22 CC717086 26:19 cell 11:6 20:2,6 20:18,21 21:7 24:22 Center 1:21 certain 18:13 Certificate 3:5,6 26:2,19 27:1 certify 26:10 27:6,9 chance 22:13 CHANGE 28:6 changes 28:3,23 chassis 9:9,11 9:12,16,24 15:18 Chicago 1:8 2:5 2:11 7:13,17 9:2 10:13,21 10:23 13:16 14:5,11 15:4 17:10,18 18:9 19:24,25 20:22 21:20,23 22:20 22:24 24:1,5 28:4 29:7 City 1:8 23:25 24:4 28:4 29:7 Civil 1:3 29:3 clarify 14:25 come 10:7 12:5 comes 12:21 Commission 26:20 commonly 9:4,7 communication 6:23 communicatio... 6:20,25 completed 12:23 16:22 29:14,18	components 15:16 16:6,7,8 16:12 19:17,18 20:4,14,19 conclude 20:12 29:18 concluded 25:13 conduit 4:18 Conference 1:21 connected 27:11 connection 13:4 connectors 9:13 contained 8:7 context 9:22 continuing 11:22 12:2,9 contract 9:2 copies 18:23 Corporation 2:9 2:13 4:12 correct 5:11 6:5 6:6 8:12,13,16 9:4 10:18 12:10,11 17:8 18:14 21:20 22:5,7 27:9 28:22 Costa 17:23 18:16 19:10 counsel 2:9 6:21 23:15,17 27:10 27:11 COUNTY 26:5 27:4 couple 24:15 course 5:7 17:6 21:16 court 1:1,19 7:21 29:1 CPD 15:16 16:7 20:4,12,13,17 21:8,24 22:3,5 23:9 25:5 CPD's 18:17 22:1 CPE 16:6 CROSS 3:4	24:17 current 4:15 customer 10:6 12:5 14:13 19:10 customers 4:19 12:21 13:17,18 17:1
	B		D	
a.m 1:15,15 25:13 29:16 Aberdeen 2:4 ability 5:21 22:1 able 20:13 22:4 access 21:6 account 10:25 12:22 13:7 16:21,24,25 17:5 accurate 5:21 acknowledged 4:3 action 1:3 27:11 27:12 29:3 additional 16:7 16:12 affidavit 3:12 5:24,25 6:1,3,7 6:12,14,17 7:4 7:20 17:11,19 18:22 agreement 3:13 al 1:8 29:7 allow 29:17 allows 14:1 answer 5:17 7:7 10:20 16:1 25:1 answered 21:2 answers 11:25 Anthony 2:12 23:19 29:12,22 APPEARAN... 2:1,3,7 approximately 22:21 arrange 29:15 asked 8:20 18:12,21,25 asking 22:14 assistance 17:2 Assistant 2:9 assume 5:18 attorney 6:10 7:18 8:15	back 7:11,12 8:11 12:21 16:3,4,19 19:10 20:23 24:9 background 12:15 bad 13:4 based 7:14 14:20 15:2 16:1 basic 4:23 basics 7:4 basing 22:5 Bear 16:3 Behalf 1:14 believe 16:12 17:12 19:3 best 21:22 beyond 7:3,4 10:11 23:7 Blvd 2:13 29:12 box 9:13 BOYLE 1:5 28:4 break 24:9,11 BREVARD 26:5 27:4 business 16:25	back 7:11,12 8:11 12:21 16:3,4,19 19:10 20:23 24:9 background 12:15 bad 13:4 based 7:14 14:20 15:2 16:1 basic 4:23 basics 7:4 basing 22:5 Bear 16:3 Behalf 1:14 believe 16:12 17:12 19:3 best 21:22 beyond 7:3,4 10:11 23:7 Blvd 2:13 29:12 box 9:13 BOYLE 1:5 28:4 break 24:9,11 BREVARD 26:5 27:4 business 16:25	D-A-V-I-S 4:10 database 12:24 13:7 14:5 19:6 19:11,12 21:12 21:14,18 databases 21:6 date 1:15 14:13 14:14 29:11 Dated 27:14 28:25 Davis 1:12 3:2 4:2,8,10,11 8:2 24:12,19 26:11 27:7 28:1,25 29:10,12 day 26:14 27:14 December 21:9 21:25 declaration 8:8 8:9,12,14,17 8:19,23 9:22 11:12,19,24 12:19 14:4 18:10 20:5 21:16 23:8,10 24:6 declare 28:21 DEFENDAN... 3:15 Defendant(s) 1:9 2:7 29:8 Deglomine 2:12 6:18 7:8 14:23 23:19,21,21 25:1,10 29:12 29:22 delete 13:23	
	C			
	C/O 29:12			

Department 2:10 7:18 9:2 10:14,21,24 13:16 14:11 15:4 17:10,18 18:9 19:24 20:1,22 21:20 21:24 22:20,24	18:20 19:1 DOYLE 29:4 draft 6:5 8:8,12 drafted 5:25 6:3 6:11 duly 4:3 26:12 duties 4:15	example 10:13 Excel 13:12 exchange 17:17 17:21 18:4,8 exchanged 18:16 exhibit 7:22,23 22:8,10 EXHIBITS 3:9 3:10,15 existed 14:22 25:6 experience 14:21 15:2 16:1 Expires 26:20 explain 6:11,14 9:12 10:3 extent 6:19 7:2	foundation 24:23 FPR 1:19 26:8 Friday 29:16 function 24:21 functionality 11:22 12:3,9 further 10:3 24:13 27:9 future 17:3	26:8,18 27:5 27:18 29:21 head 13:15 16:15 history 18:22 hope 23:19 hours 29:16
Department's 14:6 deploy 20:13 22:4 deposed 5:2 deposition 1:12 3:2 23:12,14 25:11,13 27:7 28:22 29:10 DESCRIPTI... 3:11,16 details 14:10 21:5 determination 12:25 device 9:18 21:23 22:20,23 24:21 devices 4:24 11:11,16,17 20:2,7 dials 9:13 DIRECT 3:4 4:6 disclosed 23:7 discuss 6:20 10:22 discussing 17:6 discussion 8:6 24:4 discussions 7:17 8:18 23:17,23 23:25 dispose 13:23 distinguish 9:21 District 1:1,2 29:1,2 document 18:24 19:4,9 22:17 documents	<hr/> E e-mail 12:22 13:7 16:21,24 16:25 17:5,15 19:10 e-mails 17:6,9 17:17,22 18:1 18:4,8,15 19:6 19:13 earlier 16:17 19:7 21:8,15 24:20 early 15:5 eight 16:5 19:17 either 10:6 12:4 employed 4:11 15:12 employee 27:10 27:10 ENTER 28:3 entered 28:24 equipment 4:19 8:21 12:5,20 12:24 13:8 19:7 20:22,23 20:25 21:5,8 21:19 24:25 ERRATA 3:6 28:2 Esquire 2:4,8,9 2:12 29:12,22 29:22 essential 15:16 16:6 19:18,19 19:21,21 20:6 et 1:8 29:7 Examination 1:18 3:4,4 4:6 24:17	<hr/> F fact 21:24 22:5 facts 8:7,19 familiar 9:18 far 16:4 file 13:13 files 14:1 financially 27:11 first 13:1 15:7 firsthand 12:7 five 4:22 11:3,12 11:18,23 24:9 FL 29:13 Floor 2:4 Florida 1:16,20 1:22 2:14 26:4 26:15,19 27:3 27:5,19 29:15 folder 17:14 follow 13:25 follow-up 24:15 25:9 follows 4:4 foregoing 27:8 form 28:23 formal 21:13	<hr/> G general 14:24 generally 5:6 11:6 generate 21:19 given 12:23 go 6:25 8:25 11:3 13:20 15:14 16:4,19 19:16 20:10 goes 7:3 going 6:18,19,24 7:1,2 23:16 24:3 good 4:8 24:2 Great 5:17,20	<hr/> I Identification 7:24 22:11 identify 12:17 23:18 II 9:19,22 10:1,2 11:7,9 III 2:12 29:12 29:22 Illinois 1:2 2:5 2:11 29:2 impact 22:1 important 5:13 in-house 23:15 23:17 include 10:10 19:5 included 11:17 19:8,8,12 inclusive 27:8 independent 23:4 independently 24:21 INDEX 3:1,9 indicating 17:1 information 7:14 8:21 12:22 13:22 informed 10:6 12:4 instruct 7:1 instructing 7:6 insure 11:22 12:2,9 interested 27:12 interfere 5:20 internally 18:1 involved 24:1

issues 10:16,23	8:20 18:21	19:21	12:7,13,17	10:22 14:20
item 12:23	LaSalle 2:10	Melbourne 2:14	13:4,5 14:18	15:3,25
<hr/> J <hr/>	Law 2:10	26:15 29:13	15:15 16:5	phrase 11:11
J-A-C-K-I-E	lawsuit 7:13	mentioned 13:1	17:4,9,13	piece 8:21 18:22
15:9	lawyer 8:18	16:20	18:15 19:16	Place 1:16,16,21
Jackie 15:6 18:5	lawyers 24:5	minute 16:10	20:11 22:16,23	29:15
18:17	let's 5:24 8:25	24:9	23:7	Plaintiff 1:14
January 20:1	12:12 15:14	model 9:15	once 22:13	Plaintiff's 3:10
JERRY 1:5 29:4	16:19 19:16	Monday 29:16	operation 19:22	7:23 22:10
job 4:15,15,17	20:10 22:8	morning 4:8	20:6	Plaintiff(s) 1:6
5:7 7:14	24:9	24:2,2	overall 9:1	2:3 29:5
jump 12:14	LETTER 3:7	<hr/> N <hr/>	oversight 9:1	pleasantries
<hr/> K <hr/>	limiting 11:6,8	N 2:4	<hr/> P <hr/>	24:4
keep 13:22	Line 28:6	name 4:9 9:15	P-A-T-R-I-C-...	please 4:9 15:8
14:21 17:5	list 11:10 21:19	13:10,13 14:13	4:10	22:9 29:15
KENNEDY 2:9	loaner 3:13	15:7 21:11,13	p.m 29:16	point 14:24
kept 14:18	22:20,23	Nasa 2:13 29:12	Page 3:3,11,16	18:19
kind 10:7,9	long 4:13,21	needed 10:14,14	28:6	Police 7:17 9:2
14:10	29:17	10:17	pages 27:8 29:17	10:13,21,24
kinds 10:3 11:21	look 22:14	needs 10:7 12:5	paragraph 9:1	13:16 14:6,11
King 1:21	looked 21:16	nine 20:10 22:3	9:25 10:5 11:3	15:4 17:10,18
know 5:14 6:4	Lord 13:14	North 2:10	11:12,18,23	18:9 19:24
6:24,24 8:3	Lowman 6:8	Northern 1:2	12:12,19 13:5	20:1,22 21:20
9:24 10:11,16	8:20 18:21	29:2	15:14,17 16:5	21:23 22:20,24
10:20 11:1,2	<hr/> M <hr/>	Notary 1:20	16:19 19:16,17	position 4:21,22
11:25 12:1	MAGGIE 2:8	26:19	20:10 22:3	possession 20:1
13:24 14:19	29:22	notes 27:9	particular 7:8	22:6
15:22 16:1,4	maintain 12:20	November	14:24	possible 18:15
19:18,24,25	12:22 16:21	26:20	parties 27:10	18:18 21:18
20:4,17,21	17:2,14,16	number 14:13	parties' 27:11	prepare 23:12
21:1,4,5,13	maintained 13:6	28:6	Patricia 1:12 3:2	preparing 21:16
22:2,14,19	14:10 17:13	<hr/> O <hr/>	4:2,10 26:11	present 23:23
23:1 24:24	maintenance	oath 3:5 4:4	27:7 28:1,25	presented 6:7
25:3	4:20 9:3 10:4,8	5:11 26:2	29:10,12	8:8,14,18
knowledge 12:7	11:21 12:2,9	object 6:19	PD 7:13	previously
21:22 23:8	13:25	Objection 24:23	penalties 28:21	21:23
known 9:4,7	major 15:16	office 29:15,16	people 12:5	prior 8:17 13:22
<hr/> L <hr/>	manufactured	OFFICIAL	17:21 18:16	20:23 29:18
lack 24:23	20:7 24:20	26:13	performed	privileged 6:21
laptop 9:9,11	manufacturer	Oh 13:14	14:16 15:4	PROCEEDIN...
11:13 15:18	4:17	Okay 5:2,6,10	performing	3:1
21:24	mark 7:22 22:8	5:15,16,24 6:3	15:23	process 4:25
large 1:20 9:13	Marked 7:23	6:5,7,16 7:6,10	period 13:24	product 10:7
26:19	22:10	7:20 8:6,17 9:6	22:21,24 24:19	14:13
Larry 6:8 7:1	Matt 2:4 24:16	9:12,24 10:3	perjury 28:21	Professional
	mean 11:5 16:24	10:13 11:3	person 10:15,19	27:5,5,18,19
				pronouncing

23:19 provide 5:21 7:2 8:20 18:23 19:1,13 22:23 23:2 provided 8:22 8:22 19:4 Public 1:20 26:19 purge 14:1,2 purged 14:4 purpose 6:14,16	refer 19:17 reference 9:1 13:11 17:3 referenced 9:25 11:23 12:18 13:5,6,7,11 15:17 16:17 17:11,19 18:10 19:5,6,7,22 20:5 21:14 23:10 29:14 referencing 10:4 reflected 11:11 16:16 regarding 8:21 Registered 27:5 27:18 regular 12:2,8 related 10:23 17:10 18:20 19:2 relates 14:11 relative 27:9,10 relevant 18:24 remember 13:14 16:15 17:25 repair 4:19 10:8 repairs 10:9 rephrase 5:15 report 27:7 reporter 1:19 3:6 7:22 27:1,5 27:6,18,19 Reporting 1:21 representative 4:18 10:25 request 19:8 requested 27:7 require 11:13 12:1 17:1 required 7:14 11:22 13:25 requires 12:8 research 18:21 reserved 25:12 respect 6:25 9:3	respond 7:2 17:2 responsibilities 10:10 responsible 15:22 retained 17:9 return 4:17,19 returned 14:14 16:6 20:16 returns 9:3 review 3:7 8:3 27:7 reviewed 12:18 23:14 right 10:17 22:17 23:20 routine 4:20 RPR 1:19 26:8 26:18 Rubel 15:6,10 15:12 18:5,17 19:14	shipped 20:5 shipping 19:9,9 20:14 show 21:7 sign 29:16 signed 6:1 14:4 signing 25:11 29:14,18,19 simply 21:12 simulator 11:6 20:2,7,18,22 21:7 24:22 sir 9:5 site 11:6 20:2,7 20:18,22 21:7 24:22 six 12:12,19 13:5 16:19 SOBOTA 2:8 3:4 24:15 25:4 25:8 29:22 sold 12:24 13:8 19:7 20:21 21:8,19,23 somebody 12:14 13:2 sorry 12:14 13:1 13:15 14:23 16:11 21:2,4 speak 10:15 speaking 5:6 specific 9:15 13:16 17:4,14 19:22 spell 4:9 15:7 spoke 23:14 spreadsheet 13:10,19,23 14:11 16:16,20 19:5 spreadsheets 12:20 13:6 staff 10:6 start 5:7,24 8:4 9:6 19:25 22:14 state 1:20 4:9	26:4,19 27:3 STATES 1:1 29:1 stenographic 27:9 stenographica... 27:6 Stingray 9:17,19 9:21,22,25 10:1,2 11:5,7,7 11:8,9,11,18 11:23 12:1,8 14:6 21:23 22:20 23:9 stop 29:15 Street 2:10 Stringray 9:4,7 subcategories 17:15 subject 28:23 submitted 6:1 substance 24:5 28:23 sufficient 29:17 Suite 2:10 29:15 Suntree 1:16,21 29:15 Sure 8:11 sworn 4:4 26:12 system 9:4,7,7 11:5,12,18 12:8 16:6 19:22 20:13 21:11,25 22:4 22:6 23:9 25:5 systems 11:6,10 11:23 12:1 14:6 15:17 20:18 22:1
Q				
question 5:15,17 7:7,8,11,12,21 8:10 10:20 16:2 25:1 questions 5:14 8:4 22:15 24:8 24:13				
R				
R-U-B-E-L 15:9 read 7:11,12 25:10 28:22 29:15 reading 25:11 29:14,18,19 ready 8:3,5 real 13:19 really 13:4 REASON 28:6 recall 16:22 18:25 receive 12:23 16:25 17:6 received 14:14 22:13 recognize 22:17 recollection 23:4 record 14:15,18 14:21 27:9 records 12:18 13:5 14:5 15:3 16:17 21:15 23:3				
		S		
		S 1:19 26:8,18 27:5,18 29:21 saying 17:5 scope 11:17 SEAL 26:13 search 18:19 21:18 second 8:2 23:7 send 12:21 19:11 sent 16:8,13 20:19,23 21:25 21:25 22:19 29:11 separate 12:22 September 27:14 Sergeant 17:23 18:16 19:10 serial 14:13 seven 15:14,17 19:17		
			T	
			take 8:2 24:9 taken 1:14,15,18 24:11 29:10 talk 6:19 talking 9:8 14:12,23 21:15	

technical 10:12 10:16,23 11:25 12:4	turn 12:12	way 19:11	22nd 21:9
technically 10:16	Twice 5:5	we're 14:12	24 3:4
technology 4:24	<hr/> U <hr/>	went 19:9	242-8080 1:22
Telephone 2:5	unclear 5:14	West 2:13	26 3:5
tell 6:16 7:16	undersigned 26:9	witness 1:18 3:7 4:3,5 24:14 26:10,13 29:11	27 3:6 27:8
21:11 23:16	understand 5:10 5:13,25 8:10 8:25 25:2	work 4:12	28 3:6 29:17
ten 4:14	understanding 4:23 15:19	worked 4:13,22	29 3:7
testified 4:4 8:11 24:24	understood 5:18 20:17	WRITE 28:3	<hr/> 3 <hr/>
testifying 5:10	unit 19:20	www.kingrep... 1:22	30 2:10
testimony 5:22 7:3 16:22	UNITED 1:1 29:1	<hr/> X <hr/>	31 1:15 28:1 29:10
thank 8:5,24 24:12,14 29:20	update 13:19	<hr/> Y <hr/>	311 2:4
Thanks 14:25	upgrade 4:20,25 10:8,14,15 11:13 12:2 14:12,15 15:23 17:5,7,10,18 18:2,9,17,20 19:2,9 23:9	years 4:14,22	31st 26:14
think 15:2,25 16:3 18:7,11 18:12 19:15	upgraded 10:17 15:20 16:9	Yvette 1:19 26:8 26:18 27:5,18 29:21	321 1:22
thought 10:14	upgrades 9:3 10:4,9,23 11:21 12:8 14:5 15:4 16:21	<hr/> Z <hr/>	32919 2:14 29:13
three 9:1,25 10:5	use 12:24 22:1,4	<hr/> 0 <hr/>	32940 1:22
time 1:15 8:17 9:10 11:2 13:20,24 14:3 14:24 20:8,15 20:18,23 22:6 22:21,24 24:12 24:19 29:17	utilize 20:13	<hr/> 1 <hr/>	3rd 2:4
times 5:4	<hr/> V <hr/>	1 3:12 7:22,23 27:8	<hr/> 4 <hr/>
title 4:16,17	V 28:4	10:00 1:15	4 3:4
today 5:22 23:13	various 12:20	101 29:15	<hr/> 5 <hr/>
top 13:14 16:15	Video 1:21	1025 2:13 29:12	5:00 29:16
TOPIC 2:4 3:4 4:7 7:6,10,15 8:1 14:25 15:1 22:8,12 23:22 24:12,18,23 25:9	Viera 1:16,22 29:15	11:00 1:15 25:13	5th 27:14
transcript 27:7 27:8 28:3 29:14,16,17,19	vs 1:7 29:6	1230 2:10	<hr/> 6 <hr/>
true 27:8 28:22	<hr/> W <hr/>	14 1:16,21 29:15	60602 2:11
truthful 5:21	W 29:12	17 26:20	60607 2:5
trying 8:25 16:3	wait 16:10	17-cv-00244 1:3 28:5 29:3	<hr/> 7 <hr/>
	waived 29:19	<hr/> 2 <hr/>	7 3:12
	want 6:18 8:2	2 3:13 22:10	<hr/> 8 <hr/>
		2014 10:22 16:3 21:9,25 24:20	8:00 29:16
		2015 10:22 15:5 20:1	<hr/> 9 <hr/>
		2017 1:15 26:14 26:20 27:14 28:1 29:10,18	
		22 3:13	