

1 STATE OF INDIANA)
) SS:
2 COUNTY OF MONROE)
3

4 IN THE CIRCUIT COURT OF MONROE COUNTY

5 CAUSE NO. 53C06-2203-PL-000509

6 COUNTY RESIDENTS AGAINST ANNEXATION,)
 INC., an Indiana not for profit)
7 corporation, et al.,)
)

8 Remonstrators/Appellants/Petitioners,)
)

9 -vs-)
)

10 THE COMMON COUNCIL of the City of)
 Bloomington, Monroe County, Indiana,)
11 et al.,)
)

12 Respondents.)
13

14 DEPOSITION OF CHERYL SCISCOE
15

16 The deposition upon oral examination of
17 CHERYL SCISCOE, a witness produced and sworn before
 me, Janine A. Ferren, RMR, CRR, CSR-IL No. 84-4852,
18 Notary Public in and for the County of Hamilton,
 State of Indiana, taken on behalf of the
 Respondents, at the offices of Bloomington City
19 Hall, 401 North Morton Street, Bloomington, Monroe
 County, Indiana, on the 1st day of March 2024,
20 scheduled to commence at 9:00 a.m., pursuant to the
 Indiana Rules of Trial Procedure with written
21 notice as to time and place thereof.
22
23
24
25

Page 2

1 APPEARANCES

2 FOR THE REMONSTRATORS/APPELLANTS/PETITIONERS:

3 William J. Beggs

4 BUNGER & ROBERTSON

5 211 South College Avenue

6 Bloomington, IN 47404

7 812.332.9295

8 wjbeggs@lawbr.com

9

10 FOR THE RESPONDENTS:

11 Andrew M. McNeil

12 Stephen C. Unger

13 BOSE McKINNEY & EVANS LLP

14 111 Monument Circle

15 Suite 2700

16 Indianapolis, IN 46204

17 317.684.5000

18 amcneil@boselaw.com

19 sunger@boselaw.com

20

21 ALSO PRESENT:

22 Margaret Clements

23

24

25

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1 INDEX OF EXHIBITS

2 Previously Marked Exhibits: Page

3 Exhibit 28 - Amended and Supplemented 19

4 Answers of County Residents

5 Against Annexation, Inc. to

6 City of Bloomington's

7 Interrogatories

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Page 3

1 INDEX OF EXAMINATION

2 Page

3 DIRECT EXAMINATION5

4 Questions by Andrew M. McNeil

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Page 5

1 (Time noted: 8:58 a.m.)

2 CHERYL SCISCOE,

3 having been duly sworn to tell the truth, the whole

4 truth, and nothing but the truth relating to said

5 matter, was examined and testified as follows:

6

7 DIRECT EXAMINATION,

8 QUESTIONS BY ANDREW M. McNEIL:

9 Q State your name for the record, please.

10 A Cheryl Sciscoe.

11 Q Ms. Sciscoe, my name is Andrew McNeil. We met

12 briefly off the record. I'm one of the

13 attorneys for the City of Bloomington and the

14 annexation remonstrance case.

15 Have you ever been through a deposition

16 before?

17 A I have.

18 Q How many times?

19 A Once.

20 Q When was that?

21 A In Maryland back in 1989, 1990.

22 Q What was the nature of the --

23 A Divorce.

24 Q So you've been through the process. Just the

25 limited basic ground rules are, I'm going to ask

Page 6

1 you a series of questions, and it's your
 2 responsibility to answer them as completely and
 3 as truthfully as you can. Do you understand
 4 that?
 5 A Yes.
 6 Q If you don't understand my question, will you
 7 let me know?
 8 A Yes.
 9 Q If you need to have a question repeated or
 10 rephrased, will you let me know that too?
 11 A Yes.
 12 Q Our goal is to get this done in 45 minutes or
 13 less. If you need to take a break for any
 14 reason, just let me know and we will see what we
 15 can do to accommodate that request.
 16 A Okay.
 17 Q Did you do anything to prepare for the
 18 deposition today?
 19 A Just kind of went through my head what you guys
 20 might ask.
 21 Q My last question of the day will be, "So did I
 22 ask the questions you thought I would?"
 23 Did you make any notes in preparing for
 24 your testimony?
 25 A No.

Page 7

1 Q Did you meet with Mr. Beggs or anybody at his
 2 law firm?
 3 A I had a phone call asking me if I received --
 4 they thought I'd get a notice of hearing. I got
 5 a subpoena, and just someone from his office
 6 asking if I had any questions.
 7 Q Did you have any questions?
 8 A No, not really, because there's only a few
 9 questions that I feel like you can ask.
 10 Q What are the questions you feel like I can ask?
 11 A Why I don't want to be annexed.
 12 Q That's one. Any others?
 13 A Whether, you know, I'm on city water or sewer.
 14 Q Sure.
 15 A Okay.
 16 Q Well, I'll start asking questions now.
 17 A Okay.
 18 Q What's your address?
 19 A 412 South Woodfield Lane, Bloomington.
 20 Q Is that in one of the annexation areas?
 21 A Yes, 1A.
 22 Q How long have you lived there?
 23 A Twenty-four years.
 24 Q Who lives there with you?
 25 A Nobody.

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1 Q Do you own any other property in Area 1A or 1B?
 2 A No.
 3 Q Do you have any plans to move?
 4 A No.
 5 Q Did you at some point sign a petition opposing
 6 the annexation?
 7 A I did not.
 8 Q Where do you work?
 9 A Oh, opposing?
 10 Q Yes.
 11 A Yes.
 12 Q So you did sign a petition back in the fall,
 13 winter of 2021?
 14 A Yes. Well, I signed both of them: the intent
 15 to remonstrate, and then to actually oppose.
 16 Q The intent to remonstrate petition you're
 17 talking about, was that in the summer of 2021?
 18 A I believe so.
 19 Q And then the actual petition to opposes was in
 20 October-November-December time frame?
 21 A Sounds about right yes.
 22 Q Where do you work?
 23 A I am retired.
 24 Q Where did you retire from?
 25 A IU Health.

Page 9

1 Q When did you retire?
 2 A In 2019, January.
 3 Q When you worked at IU Health, where were you
 4 stationed?
 5 A I was kind of all over. I was south central
 6 region in all the hospitals there. The last few
 7 years before I retired, which was my decision --
 8 prompted my decision because they moved my job
 9 up to Indy. So I was up at Methodist and then
 10 at the Gateway Plaza on Illinois Street.
 11 Q What did you do for IU Health?
 12 A I'm a financial analyst.
 13 Q When you signed the remonstrance petition, did
 14 you understand that you were expressing
 15 opposition to the annexation?
 16 A Yes.
 17 Q Do you still oppose the annexation?
 18 A Yes.
 19 Q Please tell me all the reasons why you oppose
 20 the annexation.
 21 A Okay. Like I said, I bought my house 24 years
 22 ago, and I intentionally bought out in the
 23 county because I did not want to live in the
 24 city. The current reasons why I oppose it is
 25 because, if I am annexed into the city, my

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1 property tax will go up \$800 a year. I'm on a
 2 fixed income. Also, trash will be added to my
 3 water bill. And currently, I buy those orange
 4 bags and I take it to the recycle center on Oard
 5 Road, which is in the county.
 6 There are certain things we can do in the
 7 county that we can't do in the city. I
 8 personally don't have a fire pit, but some of my
 9 neighbors do. And some of my neighbors have
 10 swimming pools; I do not. And then there's some
 11 invasive species that I would be required to
 12 remove if the City annexed me.
 13 Q Any other -- we'll go back through several of
 14 these, but any others, just at a high level, any
 15 other reasons why you oppose the annexation?
 16 A I can't think of anything.
 17 Q I think you said in the beginning of your answer
 18 that one of the reasons you oppose it now might
 19 have been the property taxes. Is that a newer
 20 basis for your opposition?
 21 A Well, because I wasn't in the city, and to be
 22 honest, I had no clue -- you know, I knew what
 23 property tax was, but I had no idea that the
 24 city paid more than I did out in the county.
 25 But that's been a new revelation to me that I

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1 saw on a list that, if I'm annexed, it will cost
 2 this much more.
 3 Q What list are you referring to?
 4 A There was a list that was going around the
 5 homeowners, that showed us how much our taxes
 6 would go up.
 7 Q Do you know who prepared this list?
 8 A I'm sorry, I do not.
 9 Q Do you know who was circulating it?
 10 A I do not.
 11 Q Do you know what the County Residents Against
 12 Annexation organization is?
 13 A Yes.
 14 Q Margaret Clements' organization?
 15 A Yes.
 16 Q Was that organization involved with this list
 17 that you're talking about?
 18 A No, not that I know of.
 19 Q What did the list look like?
 20 A It was just your name, your address, and I
 21 believe how much the property taxes were and
 22 then how much they would go up.
 23 Q And how did you receive this list? Was it by
 24 email or a piece of paper?
 25 A No. I just saw it at one of the County

Page 12

1 meetings.
 2 Q When did you see that, you believe?
 3 A Oh, gosh. '21, '22, sometime in that time
 4 frame.
 5 Q You had mentioned that this property tax
 6 increase issue was something that more recently
 7 came to your attention. Was that this '21, '22
 8 time period that you're referring to?
 9 A Yes.
 10 Q Other than look at that list, have you done
 11 anything else to try to determine or calculate
 12 the impact of a property tax increase from the
 13 annexation?
 14 A I called the city water customer service, asking
 15 how much more I pay than city residents for my
 16 water and sewer.
 17 Q So have you been on city water and sewer the
 18 entire 24 years --
 19 A Yes.
 20 Q -- you've owned your house?
 21 A Uh-huh.
 22 Q And what did you learn from that phone call?
 23 A Well, she couldn't tell me much because she was
 24 just comparing a city resident bill to mine.
 25 She told me the wastewater rate per thousand

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1 was, I was paying \$1.07 more, but she couldn't
 2 tell me the water difference because they also
 3 have sanitation added to their bill.
 4 Q Have you heard of there being a surcharge for
 5 out-of-city users of the sewer and water system?
 6 A No.
 7 Q Do you get a monthly water and sewer bill?
 8 A I do.
 9 Q Do you get it online or in the mail?
 10 A I get a paper copy.
 11 Q Is there a line item on your paper copy that
 12 says "surcharge" or something along those lines?
 13 A No.
 14 Q Do you have a mortgage on your property?
 15 A No. It's paid off.
 16 Q Congratulations.
 17 A That's why I can retire.
 18 Q So when you get your property tax bill, you pay
 19 it directly? It doesn't come through an escrow
 20 or mortgage company?
 21 A Right. I pay it twice a year.
 22 Q Sitting here today, do you know what your 2023
 23 property tax total amount was?
 24 A I think it was close to \$900 every six months.
 25 Q So when I had asked you if you had done anything

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1 other than looking at the list at that County
 2 meeting to understand the tax impact of the
 3 annexation, you mentioned you called the city
 4 water department.
 5 A Uh-huh.
 6 Q I'm going to go back to my question. Have you
 7 looked at any online tax calculators either
 8 through the City of Bloomington or the County or
 9 the State?
 10 A No.
 11 Q Do you have the homestead exemption on your
 12 property?
 13 A I did.
 14 Q You did or you do?
 15 A Well, I did when I bought it, so I'm assuming I
 16 still do, yes.
 17 Q Have your property taxes increased in the last
 18 five years?
 19 A Oh, yes. Every year they go up.
 20 Q Do you understand why?
 21 A Some of the reason is because of the Monroe
 22 County school district referendums that get
 23 voted in. Some of it is my assessed value.
 24 Q The assessed value has increased every year?
 25 A Of the home, yes. Well, not in my mind but in

Page 15

1 the City's mind -- or in the County's mind.
 2 Q The County, right.
 3 A Yeah.
 4 Q Right. Have you ever challenged or tried to
 5 appeal an assessment?
 6 A No, because my parents did one year and they
 7 told me what a hassle it was.
 8 Q Not worth it?
 9 A All they did was they knocked the amount that
 10 they were disputing off of the house and put it
 11 onto the land, so it didn't do any good.
 12 Q But in the years where your assessed value has
 13 increased and, as a result, your tax liability
 14 has increased, have you paid your property taxes
 15 every year?
 16 A I have.
 17 Q What year did you pay off your mortgage?
 18 A Oh, man, I don't remember the exact year, but it
 19 was probably a few years before I retired in
 20 2019.
 21 Q What is your understanding of the charge of the
 22 trash being added to the water bill?
 23 A Just that sanitation is -- the City includes it
 24 in the water and sewer bill, and we are locked
 25 in to whoever the City provides for that trash

Page 16

1 pickup.
 2 Q Do you know what the incremental cost is for
 3 that service?
 4 A I do not.
 5 Q And that's the phone call you made to the water
 6 department, was that in part what you were
 7 trying to find out?
 8 A Yeah. I was trying to figure out, and because
 9 it wasn't separate on the bill that she was
 10 looking at from somebody who lived in the city,
 11 they weren't exactly like me. She couldn't give
 12 me any kind of breakdowns.
 13 Q Other than that one phone call, did you take any
 14 steps to determine the incremental cost of the
 15 waste removal?
 16 A Well, other than, if I'm paying \$1.07 more for
 17 the wastewater, I'm probably paying \$1-something
 18 more for the water. And then sanitation, I have
 19 no clue of what that would be.
 20 Q Right. But other than making that one phone
 21 call, have you asked anywhere else or --
 22 A No.
 23 Q -- looked at any other information?
 24 A No.
 25 Q Currently, where you buy the orange bags and go

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1 to the recycle center, how many times a week do
 2 you take waste to the recycle center?
 3 A Once a week.
 4 Q You mentioned that you have a concern that if
 5 you're annexed, there are certain things you
 6 cannot do, and you mentioned a fire pit and
 7 swimming pool?
 8 A Uh-huh.
 9 Q What is your understanding on fire pits within
 10 the city limits?
 11 A That they're not allowed.
 12 Q At all?
 13 A At all.
 14 Q What's your understanding of swimming pools with
 15 respect to if they're in the city?
 16 A That they're not allowed either.
 17 Q At all?
 18 A At all, yeah.
 19 Q But you mentioned you do not have a fire pit or
 20 a swimming pool. Do you have any present
 21 intention to install either?
 22 A No, sir.
 23 Q You mentioned some invasive species that you'd
 24 be required to remove.
 25 A Uh-huh.

<p style="text-align: right;">Page 18</p> <p>1 Q What invasive species are you referring to?</p> <p>2 A I have beautiful burning bushes as a hedge on my</p> <p>3 front patio and one big one in the backyard.</p> <p>4 Q When you say you would have to remove them, what</p> <p>5 is that understanding based on?</p> <p>6 A Based on the City list on their website of the</p> <p>7 invasive species that they're requiring their</p> <p>8 residents to remove.</p> <p>9 Q And the burning bushes are on that list?</p> <p>10 A Uh-huh.</p> <p>11 Q You have to say "yes."</p> <p>12 A Yes.</p> <p>13 Q Thank you. It's just so we have a clean</p> <p>14 transcript of what is said.</p> <p>15 Any other invasive species that you have on</p> <p>16 your property besides the burning bushes?</p> <p>17 A Occasionally I'll get the garlic mustard, and I</p> <p>18 pull that up.</p> <p>19 Q I'm not familiar with that. Is that, like,</p> <p>20 something you do every year?</p> <p>21 A Yeah. The city has a weed wrangle every year,</p> <p>22 and garlic mustard is one of the things they</p> <p>23 pull out. It's just a tall green plant with a</p> <p>24 white flower on it.</p> <p>25</p>	<p style="text-align: right;">Page 20</p> <p>1 talked about that you would put into those</p> <p>2 categories?</p> <p>3 A Can't think of anything.</p> <p>4 Q And I understand you didn't -- you are not the</p> <p>5 author of this, I understand that these are not</p> <p>6 your words. But I just want to -- just as a</p> <p>7 general matter, do you believe we've covered</p> <p>8 everything that --</p> <p>9 A Yes.</p> <p>10 Q -- would be represented here?</p> <p>11 A Yes.</p> <p>12 Q And if you would turn to page 12 -- sorry,</p> <p>13 page 11, question 12.</p> <p>14 Do you have that question in front of you?</p> <p>15 A Yes.</p> <p>16 Q The question asks the respondent to "Identify</p> <p>17 and list all facts and documents supporting your</p> <p>18 contention that the annexation will have a</p> <p>19 significant financial impact upon the residents</p> <p>20 and/or landowners -- owners of land in the</p> <p>21 annexation territory," and then identify</p> <p>22 witnesses."</p> <p>23 Do you see that?</p> <p>24 A I do, yes.</p> <p>25 Q If you turn to page 12, do you see the heading</p>
<p style="text-align: right;">Page 19</p> <p>1 (Deposition Exhibit 28 previously marked</p> <p>2 for identification.)</p> <p>3 Q That document in front of you is Exhibit 28 that</p> <p>4 was identified earlier this week as CRAA's,</p> <p>5 County Residents Against Annexation's amended</p> <p>6 and supplemented answers to interrogatories.</p> <p>7 Do you have that in front of you?</p> <p>8 A Yeah, I do.</p> <p>9 Q If you could please turn to page 3, question</p> <p>10 3 -- sorry, page 2, question 3, my mistake. It</p> <p>11 says, "Identify each fact witness that you plan</p> <p>12 to call to testify in this lawsuit and provide a</p> <p>13 summary of their anticipated testimony."</p> <p>14 Do you see that?</p> <p>15 A Uh-huh, I do.</p> <p>16 Q If you go to page 4, the top of that page, do</p> <p>17 you see your name?</p> <p>18 A Yes.</p> <p>19 Q If says, "If called, Ms. Sciscoe would be asked</p> <p>20 to testify as a landowner about her opposition</p> <p>21 to annexation, city services versus other</p> <p>22 provided services, and the impact of annexation</p> <p>23 upon her."</p> <p>24 A Yes.</p> <p>25 Q Is there anything outside of what we've already</p>	<p style="text-align: right;">Page 21</p> <p>1 "Supplemental Answer"?</p> <p>2 A Yes.</p> <p>3 Q And then where it says, "If called to testify,</p> <p>4 the following individuals may be asked to</p> <p>5 testify about the significant economic impacts</p> <p>6 of the annexation upon Areas 1A and 1B," and</p> <p>7 your name is listed.</p> <p>8 Do you see that?</p> <p>9 A I do, yes.</p> <p>10 Q Other than the property tax issue that you've</p> <p>11 already described and the waste removal service</p> <p>12 you've already described, are there other -- are</p> <p>13 you aware of any other potential financial</p> <p>14 impacts upon you if the annexation is affirmed?</p> <p>15 A No, not currently.</p> <p>16 Q If you look down further on page 12, there is a</p> <p>17 question 13.</p> <p>18 A Yes.</p> <p>19 Q It starts the same way, "Identify the facts and</p> <p>20 documents supporting your contention that the</p> <p>21 annexation is not in the best interest of owners</p> <p>22 of land in the annexation territory."</p> <p>23 Do you see that?</p> <p>24 A Yes.</p> <p>25 Q If you turn to page 13, there's a supplemental</p>

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1 answer, "See Supplemental Answer Number 5. In
 2 addition, if called to testify the following
 3 would be asked to testify about the impact of
 4 the annexation upon them or upon their
 5 business," and you're the first name listed.
 6 Do you see that?
 7 A Yes.
 8 Q Do you have anything to add in response to this
 9 question that you haven't already described?
 10 A No.
 11 Q You can set that aside.
 12 Are you familiar with the City of
 13 Bloomington's fiscal plan?
 14 A No.
 15 Q Do you know what a fiscal plan is in the context
 16 of an annexation?
 17 A No.
 18 Q Do you have any information about the population
 19 density on a per-acre basis in Area 1A or 1B?
 20 A No.
 21 Q Do you have any information on the percentage by
 22 which Area 1A or 1B are subdivided?
 23 A No.
 24 MR. McNEIL: Let's go off the record for a
 25 second.


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1 (A recess was taken between 9:19 a.m. and
 2 9:21 a.m.)
 3 MR. McNEIL: Ms. Sciscoe, I have no further
 4 questions for you.
 5 THE WITNESS: Okay.
 6 MR. McNEIL: Thank you for your time.
 7 MR. BEGGS: No questions. Thank you very
 8 much.
 9 THE STENOGRAPHER: Are the witnesses
 10 reading and signing?
 11 MR. BEGGS: Yes. Just get them all to me
 12 and then I'll wrangle those.
 13 (Time noted: 9:21 a.m.)
 14 AND FURTHER THE DEPONENT SAITH NOT.
 15
 16
 17
 18 _____
 19 CHERYL SCISCOE
 20
 21
 22
 23
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Page 24

1 STATE OF INDIANA)
) SS:
 2 COUNTY OF HAMILTON)
 3 I, Janine A. Ferren, a Notary Public in and
 4 for the County of Hamilton, State of Indiana at
 5 large, do hereby certify that CHERYL SCISCOE, the
 6 deponent herein, was by me first duly sworn to tell
 7 the truth, the whole truth, and nothing but the
 8 truth in the aforementioned matter;
 9 That the foregoing deposition was taken on
 10 behalf of the Respondents, at the offices of
 11 Bloomington City Hall, 401 North Morton Street,
 12 Bloomington, Monroe County, Indiana, on the 1st day
 13 of March 2024, commencing at the hour of 8:58 a.m.,
 14 pursuant to the Indiana Rules of Trial Procedure;
 15 That said deposition was taken down
 16 stenographically and transcribed under my
 17 direction, and that the typewritten transcript is a
 18 true record of the testimony given by the said
 19 deponent; and thereafter presented to said deponent
 20 for her signature;
 21 That the parties were represented by their
 22 counsel as aforementioned.
 23 I do further certify that I am a disinterested
 24 person in this cause of action; that I am not a
 25 relative or attorney of any party, or otherwise

Page 25

1 interested in the event of this action, and am not
 2 in the employ of the attorneys for any party.
 3 IN WITNESS WHEREOF, I have hereunto set my
 4 hand and affixed my notarial seal on this 15th
 5 day of March 2024.
 6
 7 
 8
 9 _____
 10 Janine A. Ferren
 11
 12 Seal, Notary Public My Commission Expires:
 13 State of Indiana April 22, 2024
 14 Janine A. Ferren County of Residence:
 15 Commission No. NP0681591 Hamilton
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

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1 Veritext Legal Solutions
 2 1100 Superior Ave
 3 Suite 1820
 4 Cleveland, Ohio 44114
 5 Phone: 216-523-1313
 6 March 15, 2024
 7 To: William J. Beggs, Esq.
 8 Case Name: County Residents Against Annexation, Inc., et al. v. The
 9 Common Council Of The City Of Bloomington, Monroe County, Indiana, et
 10 al.
 11 Veritext Reference Number: 6465811
 12 Witness: Cheryl Sciscoe Deposition Date: 3/1/2024
 13 Dear Sir/Madam:
 14 The deposition transcript taken in the above-referenced
 15 matter, with the reading and signing having not been
 16 expressly waived, has been completed and is available
 17 for review and signature. Please call our office to
 18 make arrangements for a convenient location to
 19 accomplish this or if you prefer a certified transcript
 20 can be purchased.
 21 If the errata is not returned within thirty days of your
 22 receipt of this letter, the reading and signing will be
 23 deemed waived.
 24 Sincerely,
 25 Production Department
 26 NO NOTARY REQUIRED IN CA

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1 DEPOSITION REVIEW
 2 CERTIFICATION OF WITNESS
 3 ASSIGNMENT REFERENCE NO: 6465811
 4 CASE NAME: County Residents Against Annexation, Inc., et al.
 5 v. The Common Council Of The City Of Bloomington, Monroe County,
 6 Indiana, et al.
 7 DATE OF DEPOSITION: 3/1/2024
 8 WITNESS' NAME: Cheryl Sciscoe
 9 In accordance with the Rules of Civil
 10 Procedure, I have read the entire transcript of
 11 my testimony or it has been read to me.
 12 I have made no changes to the testimony
 13 as transcribed by the court reporter.
 14 _____
 15 Date Cheryl Sciscoe
 16 Sworn to and subscribed before me, a
 17 Notary Public in and for the State and County,
 18 the referenced witness did personally appear
 19 and acknowledge that:
 20 They have read the transcript;
 21 They signed the foregoing Sworn
 22 Statement; and
 23 Their execution of this Statement is of
 24 their free act and deed.
 25 I have affixed my name and official seal
 26 this _____ day of _____, 20____.
 27 _____
 28 Notary Public
 29 _____
 30 Commission Expiration Date
 31
 32
 33
 34
 35

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1 DEPOSITION REVIEW
 2 CERTIFICATION OF WITNESS
 3 ASSIGNMENT REFERENCE NO: 6465811
 4 CASE NAME: County Residents Against Annexation, Inc., et al.
 5 v. The Common Council Of The City Of Bloomington, Monroe County,
 6 Indiana, et al.
 7 DATE OF DEPOSITION: 3/1/2024
 8 WITNESS' NAME: Cheryl Sciscoe
 9 In accordance with the Rules of Civil
 10 Procedure, I have read the entire transcript of
 11 my testimony or it has been read to me.
 12 I have listed my changes on the attached
 13 Errata Sheet, listing page and line numbers as
 14 well as the reason(s) for the change(s).
 15 I request that these changes be entered
 16 as part of the record of my testimony.
 17 _____
 18 I have executed the Errata Sheet, as well
 19 as this Certificate, and request and authorize
 20 that both be appended to the transcript of my
 21 testimony and be incorporated therein.
 22 _____
 23 Date Cheryl Sciscoe
 24 Sworn to and subscribed before me, a
 25 Notary Public in and for the State and County,
 26 the referenced witness did personally appear
 27 and acknowledge that:
 28 They have read the transcript;
 29 They have listed all of their corrections
 30 in the appended Errata Sheet;
 31 They signed the foregoing Sworn
 32 Statement; and
 33 Their execution of this Statement is of
 34 their free act and deed.
 35 I have affixed my name and official seal
 36 this _____ day of _____, 20____.
 37 _____
 38 Notary Public
 39 _____
 40 Commission Expiration Date

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1 ERRATA SHEET
 2 VERITEXT LEGAL SOLUTIONS MIDWEST
 3 ASSIGNMENT NO: 3/1/2024
 4 PAGE/LINE(S) / CHANGE /REASON
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 Date Cheryl Sciscoe
 22 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
 23 DAY OF _____, 20____.
 24 _____
 25 Notary Public
 26 _____
 27 Commission Expiration Date

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Indiana Rules of Trial Procedure
Depositions Upon Oral Examination

Rule 30

(e) Submission to witness--Changes--Signing.

(1) When the testimony is fully transcribed, the deposition shall be submitted to the witness for reading and signing and shall be read to or by him, unless such reading and signing have been waived by the witness and by each party. "Submitted to the witness" as used in this subsection shall mean (a) mailing of written notification by registered or certified mail to the witness and each attorney attending the deposition that the deposition can be read and examined in the office of the officer before whom the deposition was taken, or (b), mailing the original deposition, by registered or certified mail, to the witness at an address designated by the witness or his attorney, if requested to do so by the witness, his attorney, or the party taking the deposition.

(2) If the witness desires to change any answer in the deposition submitted to him, each change, with a statement of the reason therefor, shall be made

by the witness on a separate form provided by the officer, shall be signed by the witness and affixed to the original deposition by the officer. A copy of such changes shall be furnished by the officer to each party.

(3) If the reading and signing have not been waived by the witness and by each party the deposition shall be signed by the witness and returned by him to the officer within thirty (30) days after it is submitted to the witness. If the deposition has been returned to the officer and has not been signed by the witness, the officer shall execute a certificate of that fact, attach it to the original deposition and deliver it to the party taking it. In such event, the deposition may be used by any party with the same force and effect as though it had been signed by the witness.

(4) In the event the deposition is not returned to the officer within thirty (30) days after it has been submitted to the witness, the reporter shall execute a certificate of that fact and cause the certificate to be delivered to the party taking it. In such event, any party may use a copy of the

deposition with the same force and effect as though
the original had been signed by the witness.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,
2019. PLEASE REFER TO THE APPLICABLE STATE RULES
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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