

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 )  
7 for profit corporation, et al. )  
 )  
8 )  
 )  
9 Remonstrators/Appellants/Petitio )  
ners, )

10 -vs- )  
11 )

12 THE COMMON COUNCIL of the City )  
of Bloomington, Monroe County, )  
Indiana, et al. )  
13 )  
14 Respondents. )  
15

16 DEPOSITION OF DEBORAH REED  
17

18 The deposition upon oral examination of  
DEBORAH REED, a witness produced and sworn before  
19 me, Colleen Brady, Notary Public in and for the  
County of Monroe, State of Indiana, taken on behalf  
20 of the Respondents, at the offices of Bloomington  
City Hall, 401 North Morton Street, Room 225,  
Bloomington, Monroe County, Indiana, on the  
21 27th day of February 2024, at 9:00 a.m., pursuant  
to the Indiana Rules of Trial Procedure with  
22 written notice as to time and place thereof.  
23  
24  
25

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1 APPEARANCES

2 FOR THE 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 BOSE MCKINNEY & EVANS LLP

13 111 Monument Circle

14 Suite 2700

15 Indianapolis, IN 46204

16 317.684.5000

17 amcneil@boselaw.com

18

19 ALSO PRESENT:

20 Margaret Clements

21

22

23

24

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1 INDEX OF EXHIBITS

2 Page

3 Deposition Exhibit No.:

4 Exhibit 32 - Answers of Deborah Reed to City . . .26

5 of Bloomington's First Set of

6 Requests for Admissions

7

8 INDEX OF EXHIBITS

9 Page

10 Previously Marked Exhibits:

11 Exhibit 27 - Answers of County Residents . . . .27

12 Against Annexation Inc., to

13 City of Bloomington's First Set

14 of Request for Admissions

15 Exhibit 28 - Amended and Supplemented . . . . .34

16 Answers of County Residents

17 Against Annexation Inc. to City

18 of Bloomington's

19 Interrogatories

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21

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1 INDEX OF EXAMINATION

2 Page

3 DIRECT EXAMINATION . . . . . 5

4 Questions by Andrew M. McNeil

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1 (Time noted: 9:53 a.m.)

2 DEBORAH REED,

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 Will you state your name please?

10 A Deborah Reed.

11 Q And may I call you Debbie?

12 A Please do, yes.

13 Q Debbie, I'm Andrew McNeil, one of the attorneys

14 for the City of Bloomington in the annexation

15 remonstrance case.

16 Have you ever had a deposition taken from

17 you before?

18 A One time years ago.

19 Q I'm going to ask -- you're familiar. I'll ask

20 you a series of questions. You need to answer

21 them truthfully. You understand that?

22 A Oh, yes. Oh, yes.

23 Q If you don't understand my question, will you

24 let me know?

25 A Thank you.

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1 Q The intention here is to be about 45 minutes or  
2 so to try to keep on a schedule. Even so, if  
3 you need to take a break for any reason, will  
4 you let me know that?  
5 A Thank you, yes. I appreciate that.  
6 Q Especially if you don't hear my question,  
7 please, ask me to speak up.  
8 What is your home address?  
9 A 2855 Old Myers Road, Bloomington, Indiana 47408.  
10 Q And that property is not part of the annexation  
11 case; correct?  
12 A No.  
13 Q By saying "No," you're -- let me rephrase that  
14 question. It was poorly worded.  
15 Is that property part of the annexation?  
16 A No.  
17 Q Do you own property in one of the annexation  
18 areas?  
19 A Yes.  
20 Q What is the address of that property?  
21 A Physical address is 2950 North Prow --  
22 P-r-o-w -- Road, Bloomington, Indiana. And the  
23 zip is 47404.  
24 Q And is that in Area 1A?  
25 A Yes, sir.

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1 Q Is that the Reed quarry?  
2 A Yes, sir.  
3 Q What's the official name or the corporate name  
4 of that business?  
5 A Reed Quarries, Inc.  
6 Q What is your role with Reed Quarries, Inc?  
7 A The official title is I'm a corporate secretary,  
8 but I do everything that's asked of me that's  
9 halfway reasonable. So some days, you might be  
10 seeing me order parts, sweep a floor. But my  
11 term, you know, is corporate secretary.  
12 Q Did you sign a remonstrance petition opposing  
13 the annexation for Area 1A?  
14 A Yes, we did.  
15 Q And who signed it? You or someone else?  
16 A I did.  
17 Q Are you an owner of --  
18 A Yes.  
19 Q You have to let me finish my question. Sorry.  
20 A I'm sorry.  
21 Q That's okay. You know what my question is, but  
22 I still have to get it out for the record.  
23 A Sorry.  
24 Q So are you an owner of the corporation, one of  
25 them?

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1 A Yes.  
2 Q How long has Reed Quarries operated at that  
3 location?  
4 A That's a good question. It was purchased in  
5 1969. But Reeds were on the property,  
6 managing -- in the stone industry, we call it  
7 stone operators; we don't have CEOs or things  
8 like that -- in the 40's.  
9 The site has been open since about the  
10 1870s.  
11 Q Does either you, individually, or the company  
12 own any other real estate in either Annexation  
13 Area 1A or Area 1B?  
14 A Not -- I don't believe anything in 1B. 1A, it  
15 wouldn't be the corporation.  
16 Q Do you own property, personally, in Area 1A?  
17 A It would you be RSD Holding.  
18 Q Is that RSD Holding, LLC?  
19 A Correct.  
20 Q What property does RSD Holding, LLC own?  
21 A There are two properties, and I apologize, I do  
22 not have by memory, the street address. But  
23 it's on West Arlington Road, both of them. I  
24 didn't realize I'd be asked that.  
25 Q Are those properties in Area 1A?

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1 A Yes.  
2 Q Did you sign a remonstrance petition with  
3 respect to those parcels?  
4 A Yes.  
5 Q What are those properties? Are they commercial  
6 properties, industrial, mining, residential?  
7 What's on those properties?  
8 A Right now, when we purchased the properties --  
9 there are two. There are little bungalows on  
10 one and on the other, there are some -- a few --  
11 there's a garage, there's an outbuilding. And I  
12 think those buildings have been there since the,  
13 maybe, 40s. I'm just not sure. We'd have to go  
14 on Elevate and look up. Again, I wasn't  
15 prepared for a question like that.  
16 Q Did you do anything specific to prepare for the  
17 deposition?  
18 A No, no.  
19 Q From where you live on Old Myers Road, to get to  
20 the Reed quarry location, what's your route of  
21 travel? What roads do you take to get there?  
22 A We -- Old Myers Road, and then we head south on  
23 Old State Road 37. Then we turn by the fire  
24 station at Whisnand Road, Whisnand, we come to  
25 Business 37, we turn south to Bales. Then we go

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1 Bales, which is -- we're headed west to Kinser.  
 2 From Kinser, we go south on Kinser until we get  
 3 to Acuff. Acuff to Prow, and Prow to the  
 4 company.  
 5 Q Is any part of that within the Bloomington  
 6 municipal limits? Or is it all unincorporated  
 7 area in the townships?  
 8 A Respectfully, you're the professional. You know  
 9 that better than I. But I do know that  
 10 Area 7 was to be annexed, and some of that was  
 11 Prow Road. But, again, you all are the experts  
 12 on that. I don't have an annexation map in  
 13 front of me.  
 14 So that's -- I do know Prow Road and Acuff  
 15 was some of that that was being considered, but  
 16 that was -- I don't know if this is the proper  
 17 term -- thrown out. 7A, I believe.  
 18 Q Right. They just didn't move forward with that  
 19 one. That's your understanding?  
 20 A Correct.  
 21 Q Do you ever go to restaurants in the City of  
 22 Bloomington?  
 23 A Respectfully, not very often.  
 24 Q Occasionally?  
 25 A Not very often.

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1 Q Is there a difference between not very often and  
 2 not at all?  
 3 A We're north of town. I don't know if you've  
 4 ever heard of Dolan, Indiana?  
 5 Q Sure.  
 6 A We're out that way. We have a farm out there.  
 7 Respectfully to everyone sitting in the room,  
 8 usually, we will go to Martinsville if we're  
 9 going to eat out.  
 10 Q Do you attend any civic events in the city?  
 11 A No.  
 12 Q Plays or concerts?  
 13 A No.  
 14 Q Attend any events at Indiana University?  
 15 A No.  
 16 Q Do you have city or water utility services at  
 17 Reed Quarries?  
 18 A We have city water. We have CenterPoint -- what  
 19 used to be Vectren -- gas, and Duke electric.  
 20 Q When you say city water, does that include sewer  
 21 service to you?  
 22 A Oh, no. No.  
 23 Q Is it on a septic system?  
 24 A Yes.  
 25 Q Are you familiar with the organization County

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1 Residents Against Annexation?  
 2 A Yes.  
 3 Q What do you understand that to be?  
 4 A A group of individuals that are very, very  
 5 concerned about the double or triple of taxes.  
 6 A lot -- it's my understanding from a couple  
 7 meetings I've gone to that some of the people  
 8 might lose their homes because they're on fixed  
 9 incomes. Lots of rules, regulations,  
 10 permitting, licensing that would take place that  
 11 a lot of people could not absorb that into their  
 12 daily lives, their daily budgets.  
 13 And so this group of individuals are trying  
 14 as reasonably as possible to make other  
 15 individuals understand the ramifications of  
 16 what's going to take place. This sounds a  
 17 little dramatic, but I compare it to what  
 18 happened to a lot of the Native Americans.  
 19 Other people came in. They wanted their land,  
 20 and they devised ways to take over that land.  
 21 That may sound a little dramatic, but that's  
 22 really how I feel.  
 23 Q I want to break that down a little bit. I asked  
 24 you if you were familiar with CRAA, County  
 25 Residents Against Annexation, and you -- one of

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1 the first things you said was you had heard of  
 2 people's property taxes potentially doubling or  
 3 tripling?  
 4 A Yes. I'm not a mathematician -- oh, I'm sorry.  
 5 Q No, that's fine. Who did you hear that from?  
 6 A I have read articles in the newspaper of  
 7 projections.  
 8 Q And you believe you read an article in the  
 9 newspaper, either physical newspaper or online,  
 10 that said the property taxes could double or  
 11 triple with the annexation?  
 12 A From 2017, there have been quite a few articles  
 13 about annexation in Monroe County, and that's  
 14 predominantly where I have done my reading.  
 15 Q Have you looked at the fiscal plan that the city  
 16 adopted as part of its annexation process in  
 17 2021?  
 18 A No, I don't know anything about that.  
 19 Q Have you done any study, personally, of the  
 20 impact, potential impact, of annexation on  
 21 property tax rates in Area 1A?  
 22 A No, no.  
 23 Q Have you done any study or analysis of potential  
 24 property impacts from the annexation in Area 1B?  
 25 A No.

<p style="text-align: right;">Page 14</p> <p>1 Q Do you have any personal knowledge that you are</p> <p>2 specifically aware of a parcel of property that</p> <p>3 would face potential property tax increase of</p> <p>4 two to three times because of the annexation?</p> <p>5 A I can just go on what I have read in the</p> <p>6 newspapers, what other people have written.</p> <p>7 Q You mentioned as part of your answer in</p> <p>8 describing CRAA that you had heard of people on</p> <p>9 fixed incomes who were either fearful of losing</p> <p>10 their home or who --</p> <p>11 A Yeah.</p> <p>12 Q -- or who may lose their homes?</p> <p>13 A Yes.</p> <p>14 Q Who or where did you hear that from or read it?</p> <p>15 A I went to two different meetings and individuals</p> <p>16 either spoke to me, personally, or they were</p> <p>17 part of the meeting process, and it was very,</p> <p>18 very sad. Very, very sad.</p> <p>19 Q Who were the people that spoke to you</p> <p>20 personally?</p> <p>21 A I don't have names. I don't have names.</p> <p>22 Q Is that the same answer for people who spoke in</p> <p>23 larger group setting?</p> <p>24 A You're talking about -- if I understand your</p> <p>25 question correctly, you're asking me the</p>	<p style="text-align: right;">Page 16</p> <p>1 not very familiar with. First time I ever been</p> <p>2 there. It's out by the fairgrounds. It has</p> <p>3 something to do with the veterans. I'm sorry, I</p> <p>4 don't know the name because I had never been to</p> <p>5 the facility. It's a very nice facility. Just</p> <p>6 down the road from the fairgrounds, and they had</p> <p>7 a nice meeting room there.</p> <p>8 Q Do you believe those two meetings, the one at</p> <p>9 fairgrounds and at the one at the veterans</p> <p>10 place, were in the same calendar year, around</p> <p>11 the same time?</p> <p>12 A No, no.</p> <p>13 Q They were spread out over different years?</p> <p>14 A Again, I didn't know I was going to be asked</p> <p>15 that; so, you know, I don't have it set in</p> <p>16 memory. But, no, they were not in the same</p> <p>17 calendar year.</p> <p>18 Q Did you have an expectation of what you would be</p> <p>19 asked at the deposition?</p> <p>20 A I thought I would be asked more questions about</p> <p>21 stone.</p> <p>22 Q We'll see if we get there.</p> <p>23 A I'm not a lawyer, you know, and so I just have</p> <p>24 no idea what to expect.</p> <p>25 Q Okay. That's fair. Have you -- you understand</p>
<p style="text-align: right;">Page 15</p> <p>1 individuals that said that they -- their budgets</p> <p>2 would be strapped or they might lose their home</p> <p>3 or they might not be able to absorb the prices.</p> <p>4 Is that correct? Is that what you're asking?</p> <p>5 Q Yes, that's my question.</p> <p>6 A Again, I can't give you individual names at this</p> <p>7 moment, no.</p> <p>8 Q Is that because you don't rememberer? Or you</p> <p>9 didn't know who they were; you just heard</p> <p>10 them --</p> <p>11 A Both.</p> <p>12 Q -- speak?</p> <p>13 A Both.</p> <p>14 Q You mentioned, I think, two meetings that you</p> <p>15 attended. Were those meetings organized by the</p> <p>16 CRAA group?</p> <p>17 A I can't answer that with 100 percent surety</p> <p>18 because I don't know the answer to that, but I</p> <p>19 think that would be likely.</p> <p>20 Q When and where did these meetings take place?</p> <p>21 A I can't give you the exact date at that given</p> <p>22 moment, sir. But one was at Monroe County</p> <p>23 Fairgrounds, and that was the earlier of the</p> <p>24 two.</p> <p>25 The second was at the -- it's a place I'm</p>	<p style="text-align: right;">Page 17</p> <p>1 that CRAA is a 501(c)(3) charitable</p> <p>2 organization?</p> <p>3 A And by that, are you saying nonprofit?</p> <p>4 Q Nonprofit or tax deductible donations?</p> <p>5 A I was aware of that, yes.</p> <p>6 Q Have you or your company ever donated funds?</p> <p>7 A Yes, yes.</p> <p>8 Q Did you donate in 2023?</p> <p>9 A Yes.</p> <p>10 Q How much?</p> <p>11 A I'd have to go back and look at my records.</p> <p>12 Q Do you have an estimate or a range?</p> <p>13 A The company? This is an estimate.</p> <p>14 Q Understand.</p> <p>15 A 2,500. Very small amount.</p> <p>16 Q You believe that was from me the company? You</p> <p>17 have to say "Yes."</p> <p>18 A Yes, yes, sorry.</p> <p>19 Q Any personally?</p> <p>20 A Yes.</p> <p>21 Q How much personally?</p> <p>22 A Again ...</p> <p>23 Q Just roughly.</p> <p>24 A Approximately 2,000; 2,500. Again, I wasn't</p> <p>25 prepared to deliver those figures today. Those</p>

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1 are approximate.

2 Q Understand. And you've made it clear that

3 that's an estimate.

4 A Thank you.

5 Q So we won't hold you to that exactness.

6 A Thank you. My word really means something to

7 me. It's very important to me. And so for me

8 just to toss things around without qualifying, I

9 won't do it.

10 Q No, I appreciate that. I appreciate you sharing

11 that.

12 A Thank you.

13 Q Over the course of the annexation process, have

14 you had email or text message communications

15 with other people about the annexation?

16 A I have with a couple of close friends. I

17 thought that was legal. Close friends.

18 Q Absolutely legal. The real question is in the

19 course of this case, were you asked to -- let me

20 ask it this way.

21 Did you review your communications about

22 the annexation to provide to either Margaret or

23 Mr. Beggs or his law firm as part of the

24 discovery process of the case?

25 A I don't understand your question, sir. Can you

Page 19

1 rephrase that?

2 Q Yes.

3 A Because that was kind of a long -- I'm not being

4 disrespectful, but rephrase that please.

5 Q No, that's the most polite "please rephrase

6 that" I've ever received.

7 A Okay. Thank you.

8 Q During the course of a lawsuit, there's what's

9 called the discovery phase.

10 A Correct.

11 Q Where we can ask for documents and the other

12 side can ask for documents. One of the things

13 the city asked for was communications that the

14 named remonstrators had about the annexation.

15 So my question is did you look for

16 communications that you had about the annexation

17 as part of the lawsuit process?

18 A Again, I don't understand where your going with

19 that. If I had some emails, it was more of a

20 conversation of a time that, I think, it was --

21 was it not the Monroe County Fairgrounds or the

22 other building. You know, time place. Did I do

23 a lot of discussing -- no, no -- you know, on an

24 email? No, no. I wouldn't do that, no.

25 Q Okay. Did anyone ask you to provide copies of

Page 20

1 your communications about the annexation as part

2 of the lawsuit?

3 A No.

4 Q Are you still -- let's see. As an owner of the

5 Reed Quarries Inc, or RSD Holdings, LLC, are you

6 still opposed to the annexation of Area 1A into

7 the City of Bloomington?

8 A Scared to death of it.

9 Q Why?

10 A Scared to death of it.

11 Q Why?

12 A Because of, again, money. We run a tight ship.

13 We don't waste money, we don't blow money. It's

14 a very, very expensive procedure, extracting

15 stone from the ground. And, again,

16 respectfully, it just seems like more and more

17 people are trying to grab onto our tailcoats.

18 We do the work. We get out in the mud and

19 the filth and sweat all day long in the

20 summertime; and all these other people are just

21 wanting to get on our coattails, and we carry

22 them. And so it is very, very scary,

23 monetarily, the increases that we would have to

24 pay.

25 Plus the fact of we have received paperwork

Page 21

1 from the City of Bloomington saying what the

2 pros, the advantages, of annexation would be and

3 none of them, none of them -- I don't have my

4 list in front of me but I have the actual

5 copy -- none of them would benefit us.

6 If anything, once again, the little red hen

7 is going to have to do all the work, and then

8 feast time, everybody sitting at the table

9 grabbing in the basket. And that's exactly the

10 way we feel.

11 Q In your answer, you referred to monetary

12 increases. What monetary increases are you

13 referring to?

14 A Taxes. Higher taxes. Permitting, license, as

15 well as a lot of the regulations and rules that

16 we're aware of, and we're only aware of a tiny

17 portion. They have fees attached to them. And

18 so we go from not paying fees, to have to pay

19 all these fees. We will not be benefiting from

20 them at all but yet we're having, once again,

21 people are loading up on our coattails, and we

22 get to do the work and the other people just

23 come in and pick off the cherry tree.

24 Q Have you yourself done an analysis of what --

25 A No.

<p style="text-align: right;">Page 22</p> <p>1 Q -- what the tax impact would be from the 2 annexation? 3 A No. 4 Q Have you had anyone -- 5 A No. 6 Q -- do a tax impact of the annexation? 7 A No, no. 8 Q Have you done an analysis of the total increase 9 cost of licensing, permitting, rules -- 10 A No. 11 Q -- rules and regulations from the annexation if 12 it were to go forward? 13 A No, sir. Because you know something, we don't 14 know. We don't know. But just to give you one 15 example, it's my understanding -- again, I'm not 16 an authority on the City of Bloomington. I'm 17 not an authority on all the rules, regulations, 18 permits, sewage all this. 19 I'm not an authority on what they charge 20 for -- whether it's free recycling or a fee for 21 sewage or pickup this or pickup that. And we 22 wouldn't be taking advantage of any of those 23 things but we would be charged for them. What a 24 great deal for the -- respectfully, what a great 25 deal for the city. Once again, you know, we're</p>	<p style="text-align: right;">Page 24</p> <p>1 Reed, Don Creek, and Rhonda Grey are anticipated 2 to testify that they were not offered an 3 in-lieu-of agreement despite the fact that other 4 property owners in Area 1A/1B were offered such 5 an agreement." 6 Do you see that? 7 A I do. 8 Q Are you familiar with the term agreement in lieu 9 of annexation? 10 A If you would ask me to explain it, I couldn't, 11 but I believe you're talking about money; right? 12 Q Well -- 13 A Taxes? 14 Q A contract or agreement with someone, say, like 15 Cook, for example. 16 A Cook Incorporated, yes. 17 Q In exchange for being annexed, to pay some 18 amount of money. 19 A I'm aware of it, but am I aware of it like most 20 of you in this room would be, no. I've heard 21 enough about it that, you know, people, 22 businesses are approached to get breaks, if 23 that's a proper assessment of what you're 24 talking about. 25 Q Are you as an owner of Reed Quarries or RSD</p>
<p style="text-align: right;">Page 23</p> <p>1 doing all the work, but we're not getting 2 anything out of it. Nothing. 3 Q You have in front of you a couple of documents. 4 If you get the one that says Exhibit 28. 5 A 28. Okay. 6 Q That's the amended and supplemented answers of 7 the County Residents Against Annexation to the 8 City of Bloomington's interrogatories. 9 Do you see that? 10 A Yes, sir. 11 Q If you turn to page 5. Question 5 on page 5: 12 "Identify and list all facts and documents 13 supporting your contention in the petition that 14 Ordinance Nos. 17-09 and 17-10 fail to include 15 equitable terms and conditions," and it 16 continues. 17 Do you see that? 18 A Yes, sir, I see it. 19 Q If you turn to page 6, there's a supplemental 20 answer in bold typeface. And if you go down 21 four paragraphs, the one that starts "Thomas 22 McGhie." 23 Do you see that? 24 A I do. 25 Q It says "Thomas McGhie, John Byers, Deborah</p>	<p style="text-align: right;">Page 25</p> <p>1 Holdings willing to pay 75 percent of the city's 2 tax rate not to be annexed? 3 A We haven't even discussed anything like that. 4 Our company has not discussed anything like 5 that. No one has approached us. We have not 6 received any kind of hard copy, email, text, 7 telephone, personal visits. No one has 8 approached us. We haven't even discussed it. 9 Q If you were approached with an agreement to pay 10 fees in lieu of being annexed starting right 11 now, is that something that Reed Quarries would 12 be interested in? 13 MR. BEGGS: Object to the form and the 14 foundation to the extent it provides her with no 15 ability to know what that agreement would say or 16 contain. You may answer with that objection. 17 A Another thing too -- to add to what he just 18 said -- there are other owners. I am not going 19 to speak for the other owners on something like 20 this. We would have to go back, discuss it. We 21 would have to higher legal help to interpret 22 everything. 23 Again, anything like this, once again, we 24 would have to spend money to figure out if we'd 25 even do something like that. And by money --</p>

<p style="text-align: right;">Page 26</p> <p>1 respectfully to both of you -- you know what  2 lawyers charge an hour. So we would have to  3 spend quite a bit of money to even find out if  4 this would benefit us or not. Plus, I would  5 never ever speak for the other owners.  6 Q Do you know, with respect to the property on  7 2950 Prow Road, how it would be classified under  8 the state's property tax caps? If it would be  9 1 percent, 2 percent, or 3 percent?  10 A I don't know. You mean, if the annexation went  11 through?  12 Q Just in general. In terms of it's -- the  13 property classification?  14 A I'm sorry. We'd probably have to go to the  15 county assessor for something like that.  16 Q You don't know off the top of your head?  17 A No, uh-uh.  18 (Exhibit 32 marked.)  19 Q If you would, let me give you Exhibit 32.  20 Debbie, do you have Exhibit 32 in front of you?  21 A Yes.  22 Q Do you see the title there "Answers of Deborah  23 Reed to the City of Bloomington's First Set or  24 Requests for Admissions"?  25 A Yes, I see it.</p>	<p style="text-align: right;">Page 28</p> <p>1 the same five requests for admissions.  2 Do you see that?  3 A Yes, sir.  4 Q Number 2 denied that Bloomington has developed  5 and adopted a written fiscal plan and  6 established definite policy for each annexation  7 territory by resolution and cites to the Indiana  8 code.  9 Do you see that?  10 A I do. Again, you're talking Number 2, at the  11 bottom?  12 Q Yes.  13 A Uh-huh.  14 Q Do you have any facts or knowledge about  15 Bloomington's fiscal plan sufficient to talk  16 about why this was denied?  17 A First of all, by Bloomington, you mean the City  18 of Bloomington government; right?  19 Q Correct.  20 A I really have zero knowledge of anything  21 definite. The only knowledge that I would have  22 is an occasional reading of a newspaper. But,  23 again, this is not my area, and I -- I don't  24 know.  25 Q So is it fair to say that you've never looked at</p>
<p style="text-align: right;">Page 27</p> <p>1 Q If you would turn to page 3 and 4. I want to  2 get you oriented to what this document has in  3 it. You see the heading where it says "Requests  4 for admissions"?  5 A Yes.  6 Q And if you look on page 4, you'll see there are  7 five requests for admissions.  8 A I'm sorry. On page 4, what number?  9 Q Page 4, you see there are a total of five  10 requests for admissions?  11 A Yes, yes. I see that.  12 Q You see where the answer to each of them is "See  13 the response of County Residents Against  14 Annexation served on or about August 4, 2023"?  15 A Do I see?  16 Q Yes.  17 A Yes.  18 (Exhibit 27 previously marked.)  19 Q If you would look at Exhibit 27, which is to  20 your right. You see the title of that document  21 is "Answers of County Residents Against  22 Annexations, Inc. to the City of Bloomington's  23 First Set of Requests for Admissions"?  24 A Yes.  25 Q If you turn to page 3 and 4, you see there are</p>	<p style="text-align: right;">Page 29</p> <p>1 the City of Bloomington's fiscal plan adopted in  2 2021?  3 A No -- pardon me. Yes, I think that's fair. But  4 I will add this, I'm not sure if a lot of laymen  5 would be doing that. Once again, you know, this  6 sounds a little colloquial and trite, but it's  7 out of my pay scale.  8 Q No, I --  9 A I would have to hire someone to be able to look  10 at this and digest this in regards to the  11 ramifications of our company.  12 Q Just for a little insight into why I ask some of  13 these questions is when the trial happens in  14 this matter and if you're call as a witness to  15 testify, I want to have an understanding of what  16 your testimony may be.  17 A Yes.  18 Q Which is what this process is for.  19 A Correct.  20 Q So if you are not familiar with the fiscal plan,  21 that's fine. I won't ask you about the fiscal  22 plans at trial if you're not testifying about  23 the fiscal plan. Does that maintenance sense?  24 A Sure.  25 Q Request Number 5 asked that the "Admit that the</p>



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1 annexation will not have significant financial  
2 impact on you," and then it refers to a section  
3 in the Indiana code. Is it your -- let me ask  
4 it this way.  
5 Have you quantified or reduced to a number  
6 the financial impact of the annexation either on  
7 Reed Quarries or RSD Holdings, LLC?  
8 A No. No, we have not. Again, we would have to  
9 hire people who are versed in this area to do  
10 something like that to weigh all the different  
11 factors. It's putting the burden on us to come  
12 up with something like that. That's pretty  
13 significant.  
14 But I can tell you, from a layman  
15 standpoint, someone who is working at the  
16 property Monday through Friday and I have for  
17 years -- my husband, my son -- it would -- the  
18 annexation by City of Bloomington would have a  
19 significant impact.  
20 Do we know the absolute dollar? No. I  
21 think we're scared to find out. Quite frankly,  
22 I think we are scared to find out. We're  
23 holding on. Holding on and, again, we're  
24 getting regulated, permitted to death, and it  
25 just seems like the utilities -- everyone is

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1 just trying to get a piece of the action, piece  
2 of action, piece of the action.  
3 THE WITNESS: I'm getting a little off  
4 here, Mr. Beggs. So you stop me if you want.  
5 Q Let me --  
6 A May I say one other thing?  
7 Q Oh, go ahead. Please, yes.  
8 A Okay. In 1956, '57, three counties make up the  
9 Indiana limestone belt. Not district but belt.  
10 Owen County, Monroe County, and Lawrence County.  
11 In 1956, '57 we had 67 quarries and mills.  
12 Now we're down, in 2024, to approximately eight  
13 quarries and a sprinkling of mills. This is so  
14 much bigger than one owner or one group that  
15 might own a company out of, you know, where ever  
16 they live. This is the nation's building stone.  
17 And, again, we feel -- right or wrong -- this  
18 huge greedy, grabby effort to take control. Add  
19 more taxes. Add unbelievable rules,  
20 regulations, permitting. They just -- honestly,  
21 we feel they don't realize what they're doing.  
22 It's so much bigger. So much bigger than an  
23 individual like me. I'll be dead and gone.  
24 I'll be dead and gone. But if they ruin one of  
25 the last quarries in three counties -- that's

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1 eight in three counties not eight in each  
2 county -- it's just an absolute crime against  
3 nature.  
4 Q So why --  
5 A A crime against nature.  
6 Q What rules and regulations from the City of  
7 Bloomington, specifically, will impact the  
8 operations of the quarry at the Prow Road  
9 property?  
10 A Respectfully, sir, you asked me that very, very  
11 early and I don't know. And I admitted I don't  
12 know the list of all the rules and regulations.  
13 I've never lived in the city. I've never had a  
14 business in the city. So I don't know.  
15 But I do know the things that have been  
16 listed, again, that I have seen in the  
17 newspapers and things like that, that it would  
18 be very, very difficult for us to continue to  
19 operate. And, again, it's not us. It's not us.  
20 It's not about our family. It's not about our  
21 ownership.  
22 You've got to realize what you're doing by  
23 trying to take control of this -- if you will --  
24 approximately 100 acres. It's one of the last  
25 quarries in three counties.

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1 Here's another thing too -- and I'm sorry,  
2 I'm getting a little carried away.  
3 MR. BEGGS: You're fine.  
4 THE WITNESS: You stop me if you want.  
5 Q Technically, there's no question pending. But,  
6 please, go ahead.  
7 A Okay. All right. You have limestone -- I don't  
8 know if any of you in this room are aware of  
9 this. You have limestone in Texas. You have it  
10 in Arkansas. You have it in Canada. You have  
11 it in Europe -- and this isn't a sales pitch.  
12 We've got, again, the limestone belt: Owen  
13 County, Monroe County, and Lawrence County.  
14 It's approximately 28 to 30 miles long; 1 to 2,  
15 10 miles wide, and it's the finest limestone in  
16 the world. In the world. That's not Debbie  
17 Reed saying it. That's architects. That's  
18 geologists. That's historians. And it goes  
19 back years and years and years. It's not just  
20 me sitting here saying that.  
21 That being said, again, we -- you can't  
22 find anything like it in Texas, in Arkansas, in  
23 England, in Italy, Canada. They have limestone  
24 but nothing, nothing, the quality of this. So  
25 then, again, we're down to approximately eight

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1 quarries left -- eight quarries left. And the  
 2 idea of people wanting to take control of this  
 3 100 acres -- it's approximate 100 acres -- and  
 4 make all these rules, regulations, changes.  
 5 They are going to kill it.  
 6 (Exhibit 28 previously marked.)  
 7 BY MR. MCNEIL  
 8 Q Let me try to tie this all together. If you go  
 9 to Exhibit 28, it's the one we looked at  
 10 earlier. It's the longer one. That one.  
 11 If you go to page 11, this is the  
 12 supplemented answers to the interrogatories from  
 13 CRAA. It's page 11. Question 12. The question  
 14 refers to the facts and documents supporting the  
 15 contention in the petition that the annexation  
 16 will have a significant financial impact upon  
 17 residents or owners of land in the territory.  
 18 Do you see that?  
 19 A I see it.  
 20 Q If you turn to page 12 and the supplement  
 21 answer, do you see where your name is identified  
 22 there?  
 23 A Yes.  
 24 Q If you look at Question 13 on page 12 "Identify  
 25 and list the facts and documents supporting the

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1 contention in the petition that the annexation  
 2 is not in the best interest of the owners of  
 3 land in the annexation territory."  
 4 Do you see that?  
 5 A I do.  
 6 Q If you flip over to page 13, as part of the  
 7 supplement answer, do you see your name  
 8 identified there at the end of the third line?  
 9 A Yes.  
 10 Q Is there anything beyond what you already  
 11 testified to that from your perspective the  
 12 annexation would cause a significant financial  
 13 impact on you or Reed Quarries or RSD Holdings,  
 14 or is not in your best interest -- you, being  
 15 you or the companies?  
 16 You don't have repeat what you already  
 17 said. Is there anything new or different that  
 18 you would add to the significant financial  
 19 impact or best interest question?  
 20 A I could -- I could come up with lots and lots of  
 21 things right now of how it would impact the  
 22 company, the operation.  
 23 If we were all standing at what we call the  
 24 quarry site -- we call it the ledge, that is a  
 25 colloquial term used in the limestone industry.

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1 The ledge is where you're working. If we were  
 2 all standing there -- because I did this last  
 3 week and I was thinking about annexation because  
 4 I'm up there a lot, I'm up there a lot. Am I  
 5 drilling, no. Am I running a crane, no. But  
 6 I'm up there three, four, five times a week. Of  
 7 course my husband, son, they're up there all day  
 8 long, all day long, with the other wonderful men  
 9 that help us there. But if you would look up  
 10 and you would see the entire -- as much as you  
 11 can, I say entire -- as much as you can, the  
 12 scope of it, you -- maybe some of this would be  
 13 clearer to you.  
 14 When you are dealing with 8, 10, 15, 17 ton  
 15 blocks and you're moving them all day long,  
 16 different places on the property, you can't have  
 17 five acres to operate on.  
 18 The equipment that you see on highway  
 19 construction -- for example, like I-69 -- as you  
 20 go up to Indianapolis, respectfully, most of  
 21 that equipment is like tinker toys compared to  
 22 what is running in the quarries every day.  
 23 These big, big, loaders: 988Bs, you've got  
 24 excavators, big excavators, we've got two  
 25 150-ton cranes, one 60-ton crane, you cannot

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1 operate on a tiny area. And --  
 2 Q Is it your testimony that the annexation would  
 3 somehow interfere with those operations?  
 4 A Absolutely.  
 5 Q How?  
 6 A Absolutely. We have heard rumblings before,  
 7 where they tried to put roads through our  
 8 property.  
 9 Q The City of Bloomington tried to put road, or  
 10 the state?  
 11 A The government, period. State, federal, local.  
 12 All three levels. State, federal, and local.  
 13 Q Do you understand that roads can be put on your  
 14 property through eminent domain --  
 15 A Sure I do.  
 16 Q -- separate from annexation?  
 17 A Sure I do.  
 18 Q Sorry, I'm trying to --  
 19 A That's why I'm here today to try -- to try to  
 20 make -- pardon me -- to try to convince you  
 21 people what you're doing. You have a deposit of  
 22 limestone. It has nothing to do with our  
 23 family. It has nothing to do with the present  
 24 ownership. It's a crime against nature what you  
 25 all are trying to do by this greedy, grabby

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1 takeover of this 100 acres.

2 Q And I'm simply trying to understand how the

3 annexation --

4 MR. BEGGS: Excuse me, counsel --

5 MR. MCNEIL: No, we're running out --

6 MR. BEGGS: She was in the middle of her

7 answer.

8 THE WITNESS: I'm trying to --

9 MR. MCNEIL: It's not responsive.

10 MR. BEGGS: It is responsive. She gets to

11 testify, counsel. Let her finish her answer.

12 BY MR. MCNEIL

13 Q The question is --

14 A 330 --

15 Q The question is how --

16 A 330 million years --

17 Q -- how will the annexation impact Reed Quarries?

18 That's the question.

19 A By curtailing our activities. Again, we have --

20 Q How will the activities be curtailed? Through

21 rules and regulations and licensing?

22 A Yeah, I think I already said that several times.

23 Q Right. That's why my question is: Is there

24 anything else beyond what you already said?

25 A Yeah, I'm trying to say as far as operating on a

Page 39

1 smaller area, it's almost impossible. The size

2 of the blocks, the size of quarry, and here's

3 another thing too --

4 Q Why would it be a smaller area --

5 MR. BEGGS: Wait a minute, counsel --

6 Q Why would it be -- Bill, why would it be a

7 smaller area?

8 MR. BEGGS: Excuse me.

9 Q The question is why would it be a smaller area?

10 MR. BEGGS: The witness is entitled to

11 finish her answer. You have interrupted now

12 twice.

13 MR. MCNEIL: The rambling is nonresponsive.

14 MR. BEGGS: I get to make my record, Andy.

15 MR. MCNEIL: It's Andrew, by the way.

16 MR. BEGGS: Sorry, Andrew, I apologize for

17 that. She has been in the middle of two answers

18 that you just interrupted. Now nonresponsive is

19 the court's province. Not yours. Kindly let

20 the witness finish her answer.

21 BY MR. MCNEIL

22 Q I've given the witness a lot of latitude. I'm

23 trying to stay on a schedule. And I want to

24 understand how the annexation will result in a

25 smaller area for Reed Quarries to work. That's

Page 40

1 part of your answer and I don't understand why

2 one follows the other.

3 A We have to have space. We have to have the

4 property to operate these big machines.

5 Q How is the annexation reducing the space?

6 That's what I don't understand.

7 A Because we're going -- if we have to pay out

8 more money in taxes, we have to live within all

9 these different rules and regulations. And the

10 fact too that, if you would look on Elevate

11 right now or a topo map, to the, respectfully,

12 the amateur, you would look and you would see

13 all this area and you would think, "Well, that's

14 quarried out. That's quarried out," that's a

15 colloquial term, again, for the extractions

16 done. This is a building. Here's a building --

17 so the common assessment would be "Well, they're

18 done with this. They're done with this. Then

19 we can do this or that or whatever." But

20 there's stone there. There's stone there.

21 When you get, again, Elevate, you look at a

22 topo map, there are areas that look like we're

23 finished and we're not. We have -- so that's

24 what would hurt us too.

25 Q But how does the annexation impact that? That's

Page 41

1 what I don't understand.

2 A We're afraid -- we're afraid with this

3 annexation that it's a land grab.

4 Q So are you saying you would have to sell

5 property to pay the increase taxes on other

6 parcels?

7 A Well, could be. Could be. I have seen that

8 happen in Monroe County many, many, times where

9 people have property and they can't afford the

10 increase in taxes or the rules or the

11 regulations. They can't live within that and

12 still have a, you know, bottom line and it not

13 go in the red.

14 Q And if I understand your testimony from today,

15 the analysis of how that would impact Reed

16 Quarries has not occurred, but you are afraid of

17 what may happen.

18 A We have not made that assessment. Once again,

19 we would have to hire other people to come in

20 and do something like that. That is not our

21 area of expertise -- if you will allow me the

22 colloquial term here -- crunching figures like

23 that. We would have to go spend a ton of money.

24 We don't have attorneys at our beck and

25 call all the time. We don't have accountants at

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1 our beck and call. We would have to have these  
 2 people do that.  
 3 I would like to say this, once again, and  
 4 I'm sorry it may not have come clear. That 100  
 5 acres, there's stone. There's good stone.  
 6 330 million years ago -- between 330 million  
 7 years ago and 340 million years ago, that's when  
 8 that stuff -- if you will, that stone -- the  
 9 nations building stone, was formed.  
 10 So when you look at that piece of property,  
 11 it's not like we're finished with that. We're  
 12 finished with that. We go different parts of  
 13 the property because of a job, quality, color.  
 14 And, again, to try to have to live with all  
 15 this, it would be very, very difficult.  
 16 Q So if the annexation goes forward tomorrow, you  
 17 still own all of the same real estate that you  
 18 own today; correct?  
 19 A I would assume so. You're the experts. I would  
 20 assume so. I don't think they can steal it from  
 21 us.  
 22 Q Right. They are not taking your property in the  
 23 annexation. It's just --  
 24 A Well, in essence, they are.  
 25 Q -- changing the relationship between governing

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1 authority.  
 2 A In essence they are. In essence they are.  
 3 MR. MCNEIL: I have no further questions.  
 4 A Sorry. I respect you greatly, but I just don't  
 5 feel this is anything but they are trying to --  
 6 a big grab of land. And the way they've done --  
 7 not City of Bloomington but historically -- is  
 8 you drive the natives out by raising taxes,  
 9 raising taxes, rules, regulations. And then  
 10 they get so discouraged, they get so worn out  
 11 that they give up. And then they have to go to  
 12 some other state. Some other county. Again,  
 13 it's much like what's happened historically.  
 14 Q I did say I have no further questions. I do  
 15 have one more. Is the quarry property for sale  
 16 right now?  
 17 A Oh, no, no. We have -- we are a small outfit.  
 18 We're not big like a couple of the others. It's  
 19 family owned. We're not greedy. We're not  
 20 grabby. We have family members that are coming  
 21 up.  
 22 Q You have no current intention to sell?  
 23 MR. BEGGS: Wait a minute, counsel --  
 24 MR. MCNEIL: The question is -- Bill, the  
 25 question was: Is the property for sale? And

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1 she answered that question "No, it is not."  
 2 MR. BEGGS: She was in the middle of an  
 3 answer. Once again you've interrupted her. You  
 4 think it's not responsive. That may be your  
 5 perspective, but that's not your decision to  
 6 make.  
 7 MR. MCNEIL: Respectfully, it is my  
 8 decision to make.  
 9 MR. BEGGS: If we need to get the court on  
 10 the phone --  
 11 MR. MCNEIL: Call them.  
 12 MR. BEGGS: -- to solve this repeated  
 13 interpreting of both the witnesses and me when  
 14 I'm making my record, we'll do that. If that's  
 15 what you normally want to do, we can get the  
 16 court involved.  
 17 MR. MCNEIL: By the way, your speaking  
 18 objections are inappropriate. Particularly when  
 19 the witness says "in addition to what he said."  
 20 MR. BEGGS: You know exactly what I'm  
 21 talking about here, Andrew.  
 22 MR. MCNEIL: Your speaking objections are  
 23 inappropriate. The witness has answered the  
 24 question.  
 25 MR. BEGGS: The witness was in the middle

Page 45

1 of her answer. And you didn't like it or  
 2 something.  
 3 MR. MCNEIL: You know exactly, Bill, what's  
 4 going on.  
 5 MR. BEGGS: Something prompted you to  
 6 interrupt her.  
 7 MR. MCNEIL: She had answered my question,  
 8 and I am trying to be respectful of the other  
 9 witnesses who are coming in.  
 10 MR. BEGGS: Look, I've been patient. I let  
 11 you do it multiple times. If you want to get  
 12 the court involved, we can.  
 13 MR. MCNEIL: Bill, if you are going to  
 14 threaten to call the court, call the court.  
 15 MR. BEGGS: Okay. You want to right now?  
 16 MR. MCNEIL: It's up to you.  
 17 MR. BEGGS: Okay. Let's just do that.  
 18 Are you finished, Debbie?  
 19 THE WITNESS: Yes, sir.  
 20 MR. BEGGS: Are you finished, Andrew?  
 21 MR. MCNEIL: What was my last question?  
 22 (Off the record.)  
 23 (The text was read by the reporter.)  
 24 BY MR. MCNEIL  
 25 Q Do you have any current intention to sell the

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1 property at Reed Quarries?  
 2 A So are you asking me again?  
 3 Q It's a different question. One was is the  
 4 property for sale. And the next question  
 5 is: Is there any present intention to sell?  
 6 And that's just a "Yes" or "No."  
 7 A Respectfully, it's not a "Yes" or "No" for me.  
 8 Okay.  
 9 MR. MCNEIL: I will withdraw the question.  
 10 I have no further --  
 11 THE WITNESS: No, please. You asked --  
 12 MR. MCNEIL: I'm withdrawing the  
 13 question --  
 14 THE WITNESS: You asked --  
 15 MR. MCNEIL: -- I have no further  
 16 questions.  
 17 THE WITNESS: You asked.  
 18 MR. MCNEIL: The question is withdrawn.  
 19 THE WITNESS: At this given moment, no,  
 20 unless this whole annexation thing paralyzes our  
 21 company where we are forced to, forced to.  
 22 MR. MCNEIL: I have no further questions.  
 23 MR. BEGGS: No questions. Thank you very  
 24 much.  
 25 (Time noted: 10:51 a.m.)

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1 AND FURTHER THE DEPONENT SAITH NOT.  
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 5 \_\_\_\_\_  
 6 DEBORAH REED  
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 8  
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 10  
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1 STATE OF INDIANA )  
 ) SS:  
 2 COUNTY OF MONROE )  
 3 I, Colleen Brady, a Notary Public in and for  
 4 the County of Monroe, State of Indiana at large, do  
 5 hereby certify that DEBORAH REED, the deponent  
 6 herein, was by me first duly sworn to tell the  
 7 truth, the whole truth, and nothing but the truth  
 8 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 Room 225, Indianapolis, Monroe County, Indiana, on  
 13 the 14th day of February 2024, commencing at the  
 14 hour of 9:53 a.m., pursuant to the Indiana Rules of  
 15 Trial Procedure;  
 16 That said deposition was taken down  
 17 stenographically and transcribed under my  
 18 direction, and that the typewritten transcript is a  
 19 true record of the testimony given by the said  
 20 deponent; and thereafter presented to said deponent  
 21 for her signature;  
 22 That the parties were represented by their  
 23 counsel as aforementioned.  
 24 I do further certify that I am a disinterested  
 25 person in this cause of action; that I am not a

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1 relative or attorney of any party, or otherwise  
 2 interested in the event of this action, and am not  
 3 in the employ of the attorneys for any party.  
 4 IN WITNESS WHEREOF, I have hereunto set my  
 5 hand and affixed my notarial seal on this 15th  
 6 day of March 2024.  
 7  
 8 *Colleen Brady*  
 9 Colleen Brady  
 10  
 11 Seal, Notary Public My Commission Expires:  
 12 State of Indiana March 8, 2029  
 13  
 14 Colleen Brady County of Residence:  
 15 Commission No. NP0732235 Monroe  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 50

1 Veritext Legal Solutions  
1100 Superior Ave  
2 Suite 1820  
Cleveland, Ohio 44114  
3 Phone: 216-523-1313  
4 March 15, 2024  
5 To: Mr. Beggs  
6 Case Name: County Residents Against Annexation Et Al v. The Common  
Council of the City Of Bloomington Et Al  
7  
8 Veritext Reference Number: 6465804  
9  
10 Witness: Deborah Reed Deposition Date: 2/27/2024  
11  
12 Dear Sir/Madam:  
13  
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  
NO NOTARY REQUIRED IN CA

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1 DEPOSITION REVIEW  
CERTIFICATION OF WITNESS  
2  
3 ASSIGNMENT REFERENCE NO: 6465804  
CASE NAME: County Residents Against Annexation Et Al v. The  
Common Council of the City Of Bloomington Et Al  
4 DATE OF DEPOSITION: 2/27/2024  
WITNESS' NAME: Deborah Reed  
5 In accordance with the Rules of Civil  
6 Procedure, I have read the entire transcript of  
my testimony or it has been read to me.  
7 I have made no changes to the testimony  
as transcribed by the court reporter.  
8  
9 \_\_\_\_\_  
Date Deborah Reed  
10 Sworn to and subscribed before me, a  
Notary Public in and for the State and County,  
11 the referenced witness did personally appear  
and acknowledge that:  
12 They have read the transcript;  
13 They signed the foregoing Sworn  
Statement; and  
14 Their execution of this Statement is of  
their free act and deed.  
15 I have affixed my name and official seal  
16 this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.  
17 \_\_\_\_\_  
18 Notary Public  
19 \_\_\_\_\_  
Commission Expiration Date  
20  
21  
22  
23  
24  
25

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1 DEPOSITION REVIEW  
CERTIFICATION OF WITNESS  
2  
3 ASSIGNMENT REFERENCE NO: 6465804  
CASE NAME: County Residents Against Annexation Et Al v. The  
Common Council of the City Of Bloomington Et Al  
4 DATE OF DEPOSITION: 2/27/2024  
WITNESS' NAME: Deborah Reed  
5 In accordance with the Rules of Civil  
6 Procedure, I have read the entire transcript of  
my testimony or it has been read to me.  
7 I have listed my changes on the attached  
8 Errata Sheet, listing page and line numbers as  
well as the reason(s) for the change(s).  
9 I request that these changes be entered  
as part of the record of my testimony.  
10  
11 I have executed the Errata Sheet, as well  
as this Certificate, and request and authorize  
12 that both be appended to the transcript of my  
testimony and be incorporated therein.  
13 \_\_\_\_\_  
Date Deborah Reed  
14  
15 Sworn to and subscribed before me, a  
Notary Public in and for the State and County,  
the referenced witness did personally appear  
16 and acknowledge that:  
17 They have read the transcript;  
18 They have listed all of their corrections  
in the appended Errata Sheet;  
19 They signed the foregoing Sworn  
Statement; and  
20 Their execution of this Statement is of  
their free act and deed.  
21 I have affixed my name and official seal  
22 this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.  
23 \_\_\_\_\_  
24 Notary Public  
25 \_\_\_\_\_  
Commission Expiration Date

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1 ERRATA SHEET  
VERITEXT LEGAL SOLUTIONS MIDWEST  
2 ASSIGNMENT NO: 2/27/2024  
3 PAGE/LINE(S) / CHANGE /REASON  
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18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_  
Date Deborah Reed  
21 SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_  
22 DAY OF \_\_\_\_\_, 20\_\_\_\_ .  
23 \_\_\_\_\_  
24 Notary Public  
25 \_\_\_\_\_  
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

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