

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 RACHEL COMBS
15

16 The deposition upon oral examination of
 RACHEL COMBS, a witness produced and sworn before
17 me, Janine A. Ferren, RMR, CRR, CSR-IL No. 84-4852,
 Notary Public in and for the County of Hamilton,
18 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 9:45 a.m., pursuant to the
 Indiana Rules of Trial Procedure with written
21 notice as to time and place thereof.
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APPEARANCES

FOR THE REMONSTRATORS/APPELLANTS/PETITIONERS:

William J. Beggs
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ALSO PRESENT:

Margaret Clements
David Combs

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1 (Time noted: 9:34 a.m.)

2 RACHEL COMBS,
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 Good morning.

10 A Good morning.

11 Q Would you please state your name for the record?

12 A Rachel Combs.

13 Q Ms. Combs, my name is Andrew McNeil. I'm one of
14 the attorneys for the City of Bloomington in the
15 annexation remonstrance case that's pending.

16 A Yes.

17 Q Have you ever provided deposition testimony
18 before?

19 A Not here, but yes, I have.

20 Q Some other -- when you say "not here," what do
21 you mean?

22 A Years ago.

23 Q How long --

24 A Thirty-five years ago, maybe.

25 Q Okay. Well, the process is still the same; the

1 technology has changed. I'm going to ask you a
2 series of questions today. Do you understand
3 that it's your responsibility to answer them as
4 completely and as truthfully as you can?

5 A Yes.

6 Q If you don't understand my question, will you
7 let me know?

8 A Yes, I will.

9 Q If I need to rephrase something or if I need to
10 speak up, will you let me know that too?

11 A I will.

12 Q These will be pretty short and to the point, but
13 if for any reason you need to take a break, will
14 you let me know that?

15 A Yes.

16 Q And your husband is present with us in the
17 deposition room today?

18 A Yes.

19 Q Did you do anything to prepare for the
20 deposition?

21 A No.

22 Q Did you make any notes in advance of coming
23 here --

24 A No.

25 Q -- about your testimony?

1 What is your address?

2 A 520 South Fieldstone Boulevard, Bloomington,
3 Indiana 47403.

4 Q Is that in one of the --

5 A 1A.

6 Q 1A.

7 Just so my record is complete, I need to
8 finish my question.

9 Is that in one of the annexation areas?

10 A It is.

11 Q In which one?

12 A 1A.

13 Q It's a little formal, but just so we have a
14 clean record.

15 How long have you lived there?

16 A Six years.

17 Q Who lives there with you?

18 A My husband, David.

19 Q Do you own any other property in either
20 Annexation Area 1A or 1B?

21 A I do not.

22 Q Do you have any plans to move?

23 A Not at the moment.

24 Q Did you personally sign a petition, a
25 remonstrance petition opposing the annexation?

1 A I did.

2 Q When you signed that petition, did you
3 understand that you were formally expressing
4 your opposition to the annexation taking place?

5 A I did.

6 Q My next question is a broad one.

7 A Okay.

8 Q So I'm going to ask you a broad question, and
9 then we'll go back through some of the details.
10 But I want you to please explain all of the
11 reasons why you oppose the annexation by the
12 City of Bloomington.

13 A The main reason is money. We are on a fixed
14 income. I do work part time, but when and if I
15 quit doing that, with the increase in our taxes
16 that's going to happen, it's going to be a
17 hardship on us. I would hope that we would be
18 able to pay for the taxes every year. I don't
19 know how high they might go. I know when this
20 all started, it was going to be at least \$800
21 more on the year.

22 That being said, our taxes have went up
23 every year because of assessments on land value.
24 It's going to be much more than that when we do
25 get annexed. So hopefully, we would like to

1 have a little money that we might be able to
2 take a weekly trip once a year at least. And if
3 it takes everything we have to live, or if we
4 can't afford that, we will be forced to move.

5 And we are in a condo. And my husband's
6 not able to get out and mow and do that, so it's
7 where we need to be. It's one level.

8 And I do not believe we will get any extra
9 resources than what we have. We do have city
10 water. That being said, that was paid for up
11 front when it was first signed up for. And I do
12 know that we pay more for our water out there
13 than the people do in the city. So we do pay
14 extra for that service.

15 Q Okay. And we'll go back through some of these
16 things, but before we do that, are there any
17 other reasons why you oppose the annexation?

18 A One other thing I can't think about right now,
19 the County takes care of the road that comes
20 through our area, and they're there every time,
21 early of a morning, when we have snows. I do
22 not believe that would happen that quickly when
23 we get annexed.

24 Q Any other reasons that come to mind right now?

25 A Not right now.

1 Q All right. So let's kind of work through some
2 of these issues that you've identified.

3 Do you have a mortgage on your property?

4 A I do.

5 Q So do you have an escrow fund that --

6 A I do not.

7 Q So do you pay your taxes directly?

8 A I do.

9 Q For how many years have you been paying your
10 property taxes directly?

11 A Ever since I've owned the home.

12 Q Do you have the homestead exemption?

13 A I do.

14 Q Have you ever looked into whether you qualify
15 for the Over 65 Property Tax Circuit Breaker?

16 A We did.

17 Q You did look into it?

18 A Yes, we did.

19 Q What did you find out?

20 A Right now we'd do better with the homestead than
21 we'd do with that, because our income is too
22 much right now.

23 Q And you mentioned you work part time?

24 A Yes.

25 Q What do you do part time?

1 A I work at the Van Buren Township Trustee office.
2 I'm accounts payable clerk. I work three days a
3 week.

4 Q How long have you done that?

5 A Since 2013.

6 Q At some point were you a full-time employee who
7 officially retired?

8 A I was. I worked at RCA for 34 years, and then I
9 worked at KeHE for a while, and then I worked at
10 Cook, and I retired from Cook in 2011, I think
11 it was.

12 Q And is your husband retired as well?

13 A Yes, full time.

14 Q Where did he retire from?

15 A Crane.

16 Q What year, approximately?

17 A I have no idea. We haven't been married that
18 long.

19 Q Oh, okay.

20 MR. COMBS: 1986.

21 Q So you mentioned that your property taxes have
22 increased due to assessed value changes from
23 year to year?

24 A Yes.

25 Q Sitting here right now, do you remember what

1 your property tax bill was, paid in 2023?

2 A I do not off the top of my head. I do know that
3 when we got our assessments last year, that they
4 had went up \$10,000. Granted, we didn't pay
5 that amount, but that's what we were taxed for.

6 Q Right. Does a tax payment of about \$800 every
7 six months for 2023 we, does that sound about
8 right?

9 A I really can't answer that because I don't know.

10 Q Okay.

11 A I'd have to pull out my papers.

12 Q But you handle the payment yourself? You write
13 the check --

14 A Yes.

15 Q -- or do it online?

16 A Yes.

17 Q Do you know what the current assessed value of
18 your property is?

19 A It hasn't come out yet. I mean, I don't have it
20 on the top of my head.

21 Q Right.

22 A All I have is what was done for last year.

23 Q Do you remember what that number was?

24 THE WITNESS: Do you remember?

25 Q You're under oath.

1 A Yeah, I don't remember.

2 Q And "I don't remember" is a totally acceptable
3 answer.

4 You mentioned on the city water, you said
5 that was paid for up front. Did you mean the
6 connection, running the lines to the condo was
7 paid for up front?

8 A Yes, yes. When the ground was purchased.

9 Q Right. Did you purchase the condo from someone
10 or did you develop it yourself?

11 A I purchased the condo from Chuck somebody.

12 Q Okay. So the condo was already there --

13 A Yes.

14 Q -- you brought it from the previous owner?

15 A Yes. It was -- I bought it from a contractor.

16 Q Okay. Were you the first person to live there?

17 A Yes.

18 Q Got you.

19 When you said "we pay extra for water," do
20 you have an extra surcharge for sewer as well?

21 A We pay our water and sewage together.

22 Q Right.

23 A But our rates are higher than they are in the
24 city.

25 Q Right.

1 A And that's going to stay that way, it will not
2 change.

3 Q Wait. You're saying it's your understanding
4 that if the annexation occurs, you will still
5 pay more?

6 A Yes.

7 Q Do you have any understanding as to why that
8 would be the case?

9 A Because, according to the City, they had to run
10 more lines out to where we live at, so we pay
11 extra for that service.

12 Q When you say "according to the City," is there
13 someone in particular you're thinking --

14 A I'm getting that information from the paper, of
15 why we pay more on this side, west side of
16 Bloomington, than what they pay in the city of
17 Bloomington, downtown, even though -- because
18 they have been hooked up longer than we have.
19 So they have to put in new sewers and water
20 lines now, so they got -- we are getting hit for
21 another cost because the City needs money for
22 that service to replace those lines. The city
23 limits is paying less than what we are.

24 Q Sure. Go ahead.

25 A So to me, we're being penalized for that even

1 though -- because they're saying we're not in
2 the city limits.

3 Q You mentioned that was in a paper. Was that a
4 paper from the city utility office or from an
5 annexation group?

6 A No. That was from the Herald-Times.

7 Q Oh, the newspaper?

8 A Yes.

9 Q Do you remember approximately when you saw that
10 or read that?

11 A Well, it's before our water bill started going
12 up. Because, yes, the rates have changed. And
13 I think, if I remember correctly, they're not --
14 they didn't do it all at once. They're
15 spreading it out like, one, two, maybe, three
16 years.

17 Q I want to make sure I understand what you're
18 describing. There's an additional charge in
19 your utility bills now because of this new
20 infrastructure that they have to --

21 A The rates increased, yes.

22 Q Because of this infrastructure improvement?

23 A Yes.

24 Q Do you understand whether there is a surcharge
25 specifically charged to you because you're an

1 out-of-city-limit customer? Separate from the
2 infrastructure, but just an extra surcharge
3 because you're in the township?

4 A Not that I'm aware of. The only thing I know on
5 the water bill is, I know that we have this
6 charge for the water and we have the charge for
7 the sewer. I know there's a surcharge for water
8 runoff or something, stormwater. I don't know.

9 Q Sure.

10 A But it's all combined into one.

11 Q Okay.

12 A But what I'm saying, the rates have increased,
13 so that's per gallon.

14 Q Okay. So is it your understanding, then, that
15 even if your property is annexed, there will be
16 no downward adjustment to any of the rates in
17 your utilities?

18 A I have not been made aware of that.

19 Q Okay.

20 A And I would have to see that before I would
21 believe that, because I've never known that any
22 charges go down anyplace.

23 Q You mentioned that you thought or had seen that
24 the increase of your property taxes would be
25 about \$800 a year?

1 A And that's when they first started with the
2 annexation.

3 Q What I wanted to understand is, where did you
4 get that information?

5 A That was from, I believe they had a company that
6 come in and did some kind of an accounting
7 process on it, and that's how that come about.

8 Q Did you see the report from that accounting
9 company or did someone tell you this
10 information?

11 A They showed it on -- we went to meetings and
12 they showed it on a board-type thing.

13 Q And was the \$800 increase specific to your
14 property or was that sort of an average impact?

15 A An average. And that was based on, I believe, a
16 time frame of 2019.

17 Q So there have been some fits and starts in this
18 annexation process. It started in 2017, and
19 then there was a legal challenge involving the
20 state, then it started up again in 2021 in
21 earnest.

22 If you can think about when you went to the
23 meeting where this report shows this tax impact,
24 when is your best estimate of when that was?

25 Was that like 2017, 2018, or was it more recent?

1 A It was probably, I'm going to say maybe -- I
2 don't remember for sure, but I'm going to say
3 early 2021.

4 Q Okay. So more recent --

5 A Yes.

6 Q -- in a relative timeline?

7 A And I could be wrong on that, because I really
8 don't remember the year.

9 Q Where was the meeting? Was it at the county
10 fairgrounds?

11 A At the fairgrounds.

12 Q Other than receiving that information at the
13 meeting at the fairgrounds about the property
14 tax impact, have you done anything else to try
15 to analyze the impact on your property bill from
16 the -- property tax bill from the annexation?

17 A I have not.

18 Q Are you familiar with the term or concept of an
19 annexation fiscal plan?

20 A I don't know that I've heard it that way, no.

21 Q Have you heard something else about sort of an
22 accounting or review of the --

23 A Like I said, the only thing I'm aware of was the
24 meeting where they had people from the City and
25 the County that presented everything.

1 Q Okay. Is that the fairgrounds meeting?

2 A Yes.

3 Q Did you go to any other meetings like that, or
4 primarily --

5 A Just that.

6 MR. McNEIL: We're going to take a break,
7 go off the record. Steve and I are going to go
8 chat, and then we'll be right back.

9 (A recess was taken between 9:51 a.m. and
10 9:53 a.m.)

11 MR. McNEIL: I have just a few more
12 questions.

13 BY MR. McNEIL:

14 Q Ms. Combs, you said you have lived in your
15 current residence for about the last six years.
16 Where did you live before?

17 A In Greene County.

18 Q You mentioned you work as, I think you said,
19 accounts payable clerk three days a week at the
20 Van Buren Township Trustee's office?

21 A Yes.

22 Q Is that Rita Barrow?

23 A It is.

24 Q You've done that since approximately 2013?

25 A Yes.

1 Q During the time when you were at work in the
2 township trustee's office, did you ever talk
3 with Ms. Barrow or hear her talk about the
4 annexation issues?

5 A We definitely talked about it, because I live in
6 the area where it was affecting me, but that was
7 it.

8 Q And I'm not going to ask you to repeat every
9 conversation you ever had with her about
10 annexation; I don't know that that would be
11 possible. But just generally, what were some of
12 the topics or issues that you would discuss with
13 Ms. Barrow about the annexation?

14 A The only thing I ever discussed with her was
15 what I've discussed with you as far as money.
16 That's my concern.

17 Q Sure, okay. When you were at work at the
18 trustee's office, did you ever see other
19 landowners come in to talk about the annexation
20 issues?

21 A They would come and ask questions. And they
22 brought in petitions that they had signed, and
23 we did hold them there at the office.

24 Q So people who were collecting signatures could
25 drop them off at the trustee's office?

1 A Yes.

2 Q And then you said you held them there. Then
3 what -- did you do anything with them?

4 A No. We just filed them.

5 Q Do you know where they went ultimately?

6 A I think we still have them, maybe.

7 Q Do you know if anybody took them to the
8 auditor's office?

9 A I know -- you mean the papers themselves?

10 Q Yes.

11 A I'm not -- I can't answer that because I really
12 don't know.

13 Q That's fine. And "I don't know" is a perfectly
14 fine answer.

15 When you were in the trustee's office, was
16 there ever an occasion where you helped prepare
17 a mailer that went out to --

18 A No, no.

19 Q Were you aware of the trustee's office working
20 on a mailer that went out to --

21 A I knew she did --

22 Q -- that went out to landowners?

23 A -- but I didn't have anything to do with it.

24 Q Did you ever talk to her about it?

25 A I knew she was doing it. She didn't have it at

1 the office.

2 Q Was it something they contracted out --

3 A Yes.

4 Q -- to a service?

5 A Yes.

6 (Deposition Exhibit 28 previously marked
7 for identification.)

8 Q I do need you to look at this document here,
9 Exhibit 28. It's called the "Amended and
10 Supplemented Answers of County Residents Against
11 Annexation to City of Bloomington's
12 Interrogatories." I don't expect that you've
13 ever seen this before but you're mentioned in
14 it, so I just want to show that to you.

15 If you look at page 2, question 3, the
16 question is, "Identify each fact witness that
17 you plan to call to testify in this lawsuit and
18 provide a summary of their anticipated
19 testimony."

20 Now, again, this is County Residents
21 Against Annexation's answers, they're not your
22 answers.

23 A Uh-huh.

24 Q But if you turn to page 4, do you see where your
25 name is listed there?

1 A Yes.

2 Q It says, "If called, Ms. Combs would be asked to
3 testify as a landowner about her opposition to
4 annexation, city services versus
5 otherwise-provided services, and the impact of
6 annexation upon her."

7 Do you see that?

8 A Yes.

9 Q Is there anything that you would add to what
10 you've already told us here in this deposition
11 that you would consider responsive to those
12 categories or your opposition to the annexation?

13 A Well, I think also, and it's not listed and we
14 haven't talked about it, but also they say they
15 would provide police protection for us. And I
16 think they're struggling now to have protection
17 cover the areas they have because they don't
18 have enough policemen. And annexing us, they
19 aren't going to be able to hire the number of
20 people they need to cover more territory.

21 Q And what is --

22 A Right now I do believe that probably the sheriff
23 is the one that takes care of our area.

24 Q What is your -- when you say you understand that
25 they're short-staffed and struggling now, what's

1 that understanding based on?

2 A What we've read in the Herald-Times. And it's
3 not just that. You hear it on the news. It's
4 kind of ongoing every place, Indianapolis, all
5 locations around. It seems like everybody is
6 having the same issue.

7 Q Right. So you've heard other news stories of
8 law enforcement organizations --

9 A Yes.

10 Q -- struggling with staffing levels --

11 A Yes.

12 Q -- not just Bloomington?

13 A Yes.

14 Q Before offering that information about the
15 police just now, did you talk to anybody else
16 today about police protection?

17 A Margaret said something to me about it.

18 Q When?

19 A Outside.

20 Q During the break?

21 A Yes.

22 Q You understand you're still under oath?

23 A I do.

24 Q What did Margaret tell you?

25 A I might mention something about police coverage.

1 Q And so before Ms. Clements prompted you to
2 mention something about police coverage, it
3 wasn't something you had thought --

4 A I probably wouldn't have said anything because I
5 haven't had any issues with needing police right
6 now.

7 Q Okay. So the police service, as far as you
8 know, you know what you've read in the paper,
9 but you have no personal experience or concerns?

10 A No, I don't have any personal experience with
11 that.

12 Q Okay.

13 A Hopefully I never have to.

14 Q Sure. You had mentioned, too, the county roads.

15 A Yes.

16 Q What's the road that you're referring to?

17 A Fieldstone.

18 Q So that's the main road outside of your
19 residence?

20 A Yes.

21 Q When was the last time there was a snow event
22 that required the County to plow the road?

23 A The last snow we've had this year.

24 Q So a couple of weeks ago?

25 A Yes.

1 Q What do you understand would change if the
2 annexation happened with respect to road
3 maintenance?

4 A The County wouldn't be in charge of it. I think
5 the City would be in charge of it. And I'm
6 sure -- personally, I believe that they would do
7 in town versus outside of the city limits,
8 farther out, first. And I may be wrong, but
9 that's what I think would happen.

10 Q And what do you base that belief on?

11 A Because I'm just basing that on what usually
12 happens. The farther out you are, the less
13 service you get in a timely manner.

14 Q Is Fieldstone Road one lane in each direction?

15 A Yes.

16 Q When you drove here this morning -- did you
17 drive or did your husband drive?

18 A I drove.

19 Q So when you drove here this morning -- did you
20 come from home?

21 A I did.

22 Q What route of travel? Walk me through the
23 streets of travel.

24 A I went up Fieldstone, hit 48, come down Third
25 Street, went to Rogers, turned on I don't know

1 what street it is, but I come in the back way
2 and parked here at the city hall.

3 MR. McNEIL: Ms. Combs, those are all the
4 questions I have for you. Thank you for your
5 time.

6 MR. BEGGS: Rachel, one question.

7 CROSS-EXAMINATION,

8 QUESTIONS BY WILLIAM J. BEGGS:

9 Q You testified earlier in response to one of
10 Mr. McNeil's questions about, your understanding
11 was that your property tax rate would increase
12 by \$800. He asked something about was that to
13 your property or on average, and I think you
14 said that was on average. Where did you get the
15 average?

16 A Actually, it's from our tax -- our --

17 Q Property?

18 A Property assessment for our property alone.

19 Q So you didn't mean to say average?

20 A No.

21 Q Is that what you're saying?

22 A Yes. It was for our property only.

23 Q I see.

24 A Where they -- it was the assessed value of our
25 property that we're taxed for.

1 Q Okay.

2 A Mine only.

3 MR. BEGGS: Thank you. No further
4 questions.

5 REDIRECT EXAMINATION,

6 QUESTIONS BY ANDREW M. McNEIL:

7 Q Let me just clarify that and make sure.

8 Was this still at the county fairgrounds?

9 A No, no. That's what I get -- that was our
10 assessment we got on our taxes. Our property
11 taxes last year --

12 THE WITNESS: Oh, you meant the \$800?

13 MR. BEGGS: Yeah.

14 THE WITNESS: No.

15 MR. BEGGS: You testified -- you were
16 asked -- well, he's asking questions. I'm
17 sorry.

18 MR. McNEIL: Well, go ahead.

19 THE WITNESS: So I think I'm confused here.

20 BY MR. McNEIL:

21 Q I think Mr. Beggs and I both want to understand
22 clearly, so let's just kind of walk through it
23 step by step. We might be repeating what we've
24 already covered, but at the end of the day we
25 want a clear record and understanding.

1 A Okay.

2 Q I think you had said you went to the meeting at
3 the fairgrounds, and while there, they had
4 talked about or you had seen information about
5 an \$800 tax increase, property tax increase?

6 A Yes.

7 Q What did you understand that \$800 to be
8 referring to?

9 A That was for my property that I live on.

10 Q So somebody there had your address that you were
11 able to cross-reference?

12 A Yes.

13 Q Okay. So that was a tax impact on your parcel?

14 A Yes.

15 Q Okay.

16 A Mine only.

17 Q Got you. And that still remains the only, call
18 it, investigation you've done to determine
19 the --

20 A Yes.

21 Q -- property tax impact of the annexation?

22 A Yes.

23 MR. McNEIL: I think that clears it up. I
24 have no further questions.

25 MR. BEGGS: You did it, thank you.

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No further questions.

(Time noted: 10:04 a.m.)

AND FURTHER THE DEPONENT SAITH NOT.

RACHEL COMBS

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 RACHEL COMBS, 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 9:34 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

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.

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8



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Janine A. Ferren

12 Seal, Notary Public
13 State of Indiana
14 Janine A. Ferren
15 Commission No. NP0681591

My Commission Expires:
April 22, 2024
County of Residence:
Hamilton

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Veritext Legal Solutions

1100 Superior Ave

Suite 1820

Cleveland, Ohio 44114

Phone: 216-523-1313

March 15, 2024

To: William J. Beggs, Esq.

Case Name: County Residents Against Annexation, Inc., et al. v. The
Common Council Of The City Of Bloomington, Monroe County, Indiana, et
al.

Veritext Reference Number: 6465811

Witness: Rachel Combs Deposition Date: 3/1/2024

Dear Sir/Madam:

The deposition transcript taken in the above-referenced
matter, with the reading and signing having not been
expressly waived, has been completed and is available
for review and signature. Please call our office to
make arrangements for a convenient location to
accomplish this or if you prefer a certified transcript
can be purchased.

If the errata is not returned within thirty days of your
receipt of this letter, the reading and signing will be
deemed waived.

Sincerely,

Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465811

CASE NAME: County Residents Against Annexation, Inc., et al.
v. The Common Council Of The City Of Bloomington, Monroe County,
Indiana, et al.

DATE OF DEPOSITION: 3/1/2024

WITNESS' NAME: Rachel Combs

In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
my testimony or it has been read to me.

I have made no changes to the testimony
as transcribed by the court reporter.

Date Rachel Combs

Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
and acknowledge that:

They have read the transcript;
They signed the foregoing Sworn
Statement; and
Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal

this _____ day of _____, 20_____.

Notary Public

Commission Expiration Date

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465811

CASE NAME: County Residents Against Annexation, Inc., et al.
v. The Common Council Of The City Of Bloomington, Monroe County,
Indiana, et al.

DATE OF DEPOSITION: 3/1/2024

WITNESS' NAME: Rachel Combs

In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
my testimony or it has been read to me.

I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
well as the reason(s) for the change(s).

I request that these changes be entered
as part of the record of my testimony.

I have executed the Errata Sheet, as well
as this Certificate, and request and authorize
that both be appended to the transcript of my
testimony and be incorporated therein.

Date Rachel Combs

Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
and acknowledge that:

- They have read the transcript;
- They have listed all of their corrections
in the appended Errata Sheet;
- They signed the foregoing Sworn
Statement; and
- Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal
this _____ day of _____, 20____.

Notary Public

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.

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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.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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