

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,)
7 INC., an Indiana not for profit)
8 corporation, et al.)
)
9 Remonstrators/Appellants/Petitioners,)

10 -vs-)
)

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

15 DEPOSITION OF RHONDA GRAY

16
17 The deposition upon oral examination of RHONDA
18 GRAY, a witness produced and sworn before me,
19 Colleen Brady, Notary Public in and for the County
20 of Monroe, State of Indiana, taken on behalf of the
21 Respondents, at the offices of Bloomington City
22 Hall, 401 North Morton Street, Room 225,
23 Bloomington, Monroe County, Indiana, on the
24 27th day of February 2024, at 3:51 p.m., pursuant
25 to the Indiana Rules of Trial Procedure with
written notice as to time and place thereof.

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1 APPEARANCES

2 FOR THE PETITIONERS:

3 William J. Beggs

4 BUNGER & ROBERTSON

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6 Bloomington, IN 47404

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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

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18

19 ALSO PRESENT:

20 Margaret Clements

21

22

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1 INDEX OF EXHIBITS

2 Page

3 Deposition Exhibit No.:

4 Exhibit 47 - Notes25

5 Exhibit 48 - Monroe County property31

6 information document,

7 Bloomington_199153-162

8 Exhibit 49 - Monroe County Low TaxInfo35

9 document,

10 Bloomington_199150-152

11

12 INDEX OF EXHIBITS

13 Page

14 Previously Marked Exhibits:

15 Exhibit 28 - Amended and Supplemented39

16 Answers of County Residents

17 Against Annexation Inc. to City

18 of Bloomington's

19 Interrogatories

20

21

22

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24

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1 INDEX OF EXAMINATION

2 Page

3 DIRECT EXAMINATION 5

4 Questions by Andrew M. McNeil

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Page 5

1 (Time noted: 3:51 p.m.)

2 RHONDA GRAY,

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 Would you state your name for the record please?

10 A Rhonda Gray?

11 Q Ms. Gray, as you know, my name is Andrew McNeil.

12 I am one of the attorneys for the City of

13 Bloomington in the annexation remonstrance case.

14 I deposed you once before when we talked about

15 the process of gathering signatures.

16 Do you recall that?

17 A Yes.

18 Q Have you provided any deposition testimony since

19 then in any other matters?

20 A No.

21 Q Just a quick refresher and some very basic

22 ground rules. I'm going to ask you a series of

23 questions and your job is to answer them as

24 completely and truthfully as you can.

25 Do you understand that?

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1 A Yes.
 2 Q If you do not understand my question, will you
 3 let me know?
 4 A I will.
 5 Q If you can't hear me or need me to rephrase
 6 something, will you let me know that too?
 7 A Yes.
 8 Q We're trying to keep these around 45 minutes.
 9 They've been 45 minutes to an hour. You are the
 10 last one for the day. If you need to take a
 11 break at any time, will you let me know that?
 12 A Yes.
 13 Q What is your address?
 14 A 3822 South Yonkers Street Bloomington, Indiana
 15 47403.
 16 Q How long have you lived at that address?
 17 A I believe 28 years. A long time.
 18 Q Who lives at that address with you?
 19 A My husband, George Gray.
 20 Q Anyone else?
 21 A No.
 22 Q Do you children?
 23 A Yes.
 24 Q They are out of the house?
 25 A Yes.

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1 Q Do you own any property -- any other property in
 2 either Annexation Area 1A or 1B?
 3 A No.
 4 Q Did you or your husband sign a remonstrance
 5 petition back in 2021?
 6 A Yes.
 7 Q Which one of you?
 8 A I did.
 9 Q Do you have any plans, presently or in the near
 10 future, to put your house up for sale?
 11 A No.
 12 Q Where do you work?
 13 A Commercial Service Heating and Cooling.
 14 Q Where is that located?
 15 A 4710 West Vernal Pike.
 16 Q How long have you worked there?
 17 A 12 years I believe.
 18 Q Is Commercial Heating --
 19 A I'm sorry. Legal name is Commercial Services of
 20 Bloomington Incorporated.
 21 Q Is the location for Commercial Services of
 22 Bloomington Incorporated where you work inside
 23 or outside of the city limits?
 24 A Outside.
 25 Q Do you know what township it's in?

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1 A I do not. They are in area 1A, I know that.
 2 Q What township are you in?
 3 A Van Buren.
 4 Q Do you ever go into the city limits of
 5 Bloomington to for any reason?
 6 A Yes.
 7 Q What reasons take you inside the city limits?
 8 A Majority of the time is meeting friends to have
 9 dinner once in a while.
 10 Q Do you ever go shopping for groceries or other
 11 clothing or other supplies inside the city
 12 limits?
 13 A I'm lucky that my husband spoils me. So he gets
 14 groceries. So I'm very rarely at a grocery
 15 store.
 16 Q Is there a usual or typical grocery store he
 17 goes to?
 18 A Kroger South or Kroger West, is my guess. I'm
 19 not with him.
 20 Q But you believe it's a Kroger store?
 21 A Kroger or Walmart.
 22 Q Or Walmart. Do you use the city parks for any
 23 reason?
 24 A Not that I can recall. Last one I would have
 25 been to was for a birthday party, and I don't

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1 know that that is city. It would be the new one
 2 down south of town. I don't know the name of
 3 that. The most recent one that was built.
 4 Q Are you talking about Karst? Or a different
 5 one?
 6 A It's a different one. I think it's off Rogers.
 7 I just can't think of the name of it.
 8 Q How long ago was this party?
 9 A I think it was probably last summer because it's
 10 usually my grandkids, I'll go.
 11 Q Do you ever participate in any city events with
 12 your grandkids? Like a city park's department
 13 programs. Anything like that?
 14 A Smithville is my granddaughter's Ellettsville is
 15 my other. My grandson does City of Bloomington
 16 Baseball. So I might go watch that.
 17 Q And when you go watch a baseball game or
 18 practice, whatever it is, where does that take
 19 place?
 20 A It's by the YMCA.
 21 Q Do you attend any civic events, concert or
 22 parades or any other programs?
 23 A I've been to the IU Auditorium a couple of
 24 times. See a comedian.
 25 Q When was the last time you think you were at IU

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1 auditorium?

2 A I think last time I was there was Jerry Seinfeld

3 was there. I saw him. I think that was the

4 last time.

5 Q Do you know when that was?

6 A Last fall, I believe.

7 Q Do you ever go to sporting events at IU?

8 A Yes, football game.

9 Q Did you go to football games this past fall?

10 A I'm not sure. Maybe one. But I'm not sure that

11 I did. They're not that great. I go to a

12 basketball game once in a while.

13 Q So when you travel into the city limits, you are

14 using city streets; correct? You have to say

15 "Yes."

16 A Yes.

17 Q Would you be willing to pay a user fee as an

18 out-of-city resident to use the city streets?

19 A Only if it was required, I would. Are you going

20 to pay county?

21 Q I already do.

22 A You already do?

23 Q Everybody pays county tax.

24 MR. BEGGS: And city.

25 THE WITNESS: And city. I pay city also.

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1 MR. BEGGS: And to use the city streets.

2 Q Do you use the city water and sewer?

3 A I do, and I pay more for that.

4 Q Because you're out-of-city user?

5 A Yes.

6 Q Would you be agreeable to disconnecting from the

7 city water and sewer line if annexation does not

8 occur?

9 A I'm sure there would have to be another way for

10 us to connect. But if there was another way to

11 connect, health wise. If it's required, it's

12 required.

13 Q Do you believe it's in your best interest to

14 continue receiving water and sewer service from

15 the City of Bloomington Utilities?

16 A I think it's in my best interest to have water

17 and sewer. From where it comes from, I don't

18 think that matters.

19 Q Is there any water or sewer provider in this

20 area other than the City of Bloomington Utility?

21 A I do not know.

22 Q You are familiar, obviously, with County

23 Residents Against Annexation?

24 A Yes.

25 Q Are you on a board, board of advisors or board

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1 of directors with that organization?

2 A Yes.

3 Q Which board?

4 A I am secretary for the board.

5 Q How long have you been secretary for on the

6 board?

7 A Little over a year.

8 Q Do you understand it's a 501(c)(3) organization?

9 A Yes.

10 Q And donations, contributions made to it can be

11 tax deductible?

12 A Yes.

13 Q Have you donated any funds to CRAA in 2023?

14 A I believe I have.

15 Q How much?

16 A I don't know off the top of my head. I'm

17 thinking \$200. I'm guessing. And a lot of

18 time.

19 Q Right. So over the course of the time the

20 annexation has been an ongoing pursuit by city,

21 have you had the opportunity or occasion to

22 communicate with other people by email or text

23 message about the annexation?

24 A Yes.

25 Q And within the last six months or so, have you

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1 undertaken to look for, search through your

2 files, electronic files, to find

3 communications --

4 A Yes.

5 Q Regarding annexation? What steps did you take

6 to do that?

7 A I did a search. I believe there was certain key

8 words. I don't remember what they were. I

9 would have to look.

10 Q Mechanically, how did you do the search? Did

11 you use a search bar --

12 A Yeah, a search bar on email and texts.

13 Q And email, was it Gmail, Outlook based?

14 A Would have been Gmail and an att.com.

15 Q Did you find any communications responsive to

16 your search terms?

17 A Not that was relevant to what I was asked to

18 search.

19 Q So in the course of your searching, did you turn

20 over any, provide copies of any communications

21 to anyone?

22 A Yes, I did.

23 Q Who did you provide them to?

24 A Margaret Clements.

25 Q When did you do that?

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1 A I believe it was early January.
 2 Q Of 2024?
 3 A Yes.
 4 Q When you signed the remonstrance petition, did
 5 you understand that by signing it, you were
 6 expressing your opposition to the annexation?
 7 A Yes.
 8 Q Do you, today, still oppose annexation?
 9 A Yes.
 10 Q Please tell me all the reasons why you oppose
 11 the annexation.
 12 A You want all the reasons?
 13 Q All of them.
 14 A How much time you got?
 15 Q I have time for as many words as you have.
 16 A First of all, I am concerned about my safety.
 17 As you know, I have lived where I'm at for 28
 18 years, which is in the county. And I have used
 19 the sheriff's department a couple of times and
 20 never had an issue. They have always been
 21 responsive. The City of Bloomington, for many
 22 years, has been understaffed 20 plus officers.
 23 And I am concerned with my safety. If I'm
 24 annexed into the city, they're going to have
 25 more people to police, and they cannot police

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1 who they have right now. So that is a concern
 2 of mine.
 3 Another concern of mine is how many
 4 unhoused there are in the City of Bloomington.
 5 I'm all for giving a hand up but not a handout.
 6 And I, personally, feel Bloomington does a
 7 really good job of a handout instead. I believe
 8 the homeless -- unhoused, I'm sorry -- the
 9 unhoused are drawn to the City of Bloomington
 10 because of what we do -- or what they do as far
 11 as offering services. With that unfortunately
 12 comes a lot of drug addition and crime. That
 13 has really increased in the last few years. I
 14 fear that if I am annexed into the city, that
 15 will flow over to where I live. Right now, my
 16 grandkids can go outside and play outside and
 17 not worry about stepping on a needle. I know
 18 that's a big issue in the City of Bloomington.
 19 Q You mean when they are at your house?
 20 A When they are at my house, yes. I mean, that's
 21 a concern of mine. I also enjoy having bonfires
 22 in my backyard. I have friends that come over.
 23 I know if I am annexed into the city, I won't be
 24 able to have an open fire in the back yard.
 25 It's not like I have a 30-foot fire. I do have

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1 fires and we sit around and have marshmallows
 2 and smores and hotdogs and enjoy family. And I
 3 still want to be able to do that.
 4 Q Do you have, like, a fire pit?
 5 A Yeah, fire pit.
 6 Q How big?
 7 A I mean, it's not huge. It's one we built
 8 ourselves. It's big enough. You know, it
 9 doesn't --
 10 Q Do you know approximately what the dimensions
 11 are?
 12 A Oh gosh no. 8-foot parameter. I'm guessing.
 13 I'm a woman. 6-foot.
 14 Q Don't sell yourself short.
 15 A Okay. It's not selling myself short but I
 16 didn't build it. It's not huge, but I know it
 17 doesn't meet the city requirements if I was
 18 annexed into the city.
 19 Q How do you know that?
 20 A Doesn't have a grate on it. I am pretty sure
 21 City of Bloomington requires you to have a grate
 22 on it for cooking. Ours does not. It's just,
 23 you know, a fire pit. Just got stone around it.
 24 Q What year did you build the fire pit?
 25 A My husband built in the last five years. I

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1 don't know what year.
 2 Q Keep going. What other reason?
 3 A What other reasons. I want to plant trees when
 4 I want or where I want to. Flowers where I want
 5 to. I don't want to have to adhere to the rules
 6 and stringent regulations that are in the city.
 7 Q Is there a particular rule or regulation that
 8 you are referring to?
 9 A I know that -- I shouldn't say "I know," I've
 10 heard there are laws with the city about how
 11 close you can plant to a sidewalk. I also know
 12 that if you want to cut a tree down, you have to
 13 call and get a permit. I mean, there's just a
 14 lot more rules and regulations in the city than
 15 there are in the county.
 16 I know a lot of the city neighborhoods have
 17 streetlights. Ours does not. I like not having
 18 that. I do live close to Walmart, Sam's Club.
 19 I already have a lot of light, and also from
 20 I-69 because there's lights on it. So I have a
 21 lot of light pollution the way it is.
 22 Q So you don't want streetlights?
 23 A I don't want. I want to go sit in my hot tub in
 24 my backyard and look at the stars and not the
 25 lights. I already see a lot of lights. So I

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1 have a concern that they are going to put a
 2 light on my corner. I don't want that.
 3 Q What else. What other reasons do you oppose the
 4 annexation?
 5 A What other reasons do I have? Want to talk
 6 about finances, or is that another question?
 7 Q Sure. Well, I mean, if it's a basis for being
 8 opposed to the annexation, this is --
 9 A Okay. I just wanted to make sure that wasn't a
 10 separate questions.
 11 I don't want my taxes increased. It will
 12 have a negative impact on me and my family if
 13 they take more money away from me. I mean, that
 14 has a negative impact on anyone. You budget.
 15 You work your whole life. You live the life
 16 that you have and you have worked hard to have
 17 what you have, and I don't need someone taking
 18 more from me. And in my opinion, I'm not get
 19 anything for it.
 20 I already have -- I have the things I need
 21 from the county. I don't see that the city
 22 offers me anything in return for the money and
 23 the higher taxes that I am going to pay.
 24 There's a lot of people that live paycheck
 25 to paycheck. I have a daughter and a husband --

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1 my daughter and her husband, they live paycheck
 2 to paycheck. She works at the Monroe County
 3 School. She works at Grandview. She works so
 4 she can be on the same schedule as the kids.
 5 And in the summertime, they struggling. They
 6 live paycheck to paycheck. I pay her to clean
 7 my house every week so they can have some extra
 8 money to go towards all the food that all the
 9 kids eat. These are things I can do to help
 10 others. If you take more money away from me,
 11 it's going to break down what I can do to help
 12 others.
 13 Q Does your daughter live in one of the annexation
 14 areas?
 15 A She does. She was one of them that actually --
 16 they had the 65 percent.
 17 Q Do you know which one?
 18 A I don't. Cedar Chase, I believe, but I'm not
 19 sure which annexation area.
 20 Q I don't think I asked, does your husband work
 21 outside of the --
 22 A He actually retired. And that's another reason.
 23 I have less money coming in than what I did.
 24 Q Where did he retire from?
 25 A He actually had his own business Geo's Windows.

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1 He installed doors and windows.
 2 Q Geo's Windows. Was that part of a franchise
 3 or --
 4 A It was an LLC. It was his own business.
 5 Q Wasn't connected to, like, B Windows or
 6 Anderson --
 7 A No, just himself. Her retired in June.
 8 Q Of '23?
 9 A Of '23. Another financial impact that it would
 10 have, my understanding is, I live in the
 11 Van Buren Township. Van Buren Fire Department,
 12 they service me whether I am city or county.
 13 But if I get annexed into the city, I'm then
 14 going to be paying taxes again because I'm going
 15 to have to pay the local income tax.
 16 So I'm going to be paying county taxes and
 17 city taxes for the same thing that I already
 18 have with the fire department. That does not
 19 benefit me at all. Another thing is
 20 Q Who's your fire provider?
 21 A Van Buren. Van Buren Township. Another thing
 22 is businesses. There are several businesses in
 23 the county, their taxes will increase thousands.
 24 Not 1,000, but thousands of dollars. And
 25 although they can increase their rate, their

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1 prices, which I'm sure they will, they will
 2 increase there's so they will be able to recoup
 3 their money. But then it's going to come down
 4 to the consumer. Which then, again, is me or
 5 anyone else who uses their business. So I'm
 6 getting impacted again financially because of --
 7 Q Can you give me an example of a specific
 8 business you're thinking of that you frequent or
 9 patronize that would experience thousands of
 10 dollar tax increase?
 11 A I just know by being on the board, there are
 12 several business that will have thousands.
 13 Q In terms of financial impact on you, is there
 14 one or two in particular that you think --
 15 A No, not on me. I'm just thinking of people in
 16 general. Anyone who at all uses a business.
 17 Any of the businesses that will be annexed in.
 18 I'm pretty easy myself. I pretty much do
 19 the same thing over and over. Walmart is the
 20 place I frequent more than most places. I
 21 believe they are in the annexation area also.
 22 But any business. I can think of -- well, not
 23 Ava's. I was going to say Ava's, but if I'm
 24 annexed into the city, that's another thing that
 25 I'm going to lose.

<p style="text-align: right;">Page 22</p> <p>1 I get to choose who my trash provider is. 2 They do trash and recyclables. They are a 3 locally owned business in Monroe County who will 4 be affected. If all of us have to use the city, 5 then, they are going to lose a lot of income, 6 which will affect one of two ways: they are 7 going to have to raise their prices and lay 8 people off, or they are going to lose their 9 business. Just doesn't make sense to me. 10 Q Any other reasons that you oppose the annexation 11 that come to mind? 12 A You care if I look at my notes? 13 Q If you -- 14 A You can have a copy. I don't say anything about 15 you in here. I promise. Just make sure I 16 covered. 17 Q We'll mark those as an exhibit when you are 18 done. 19 A That's fine. I might check my spelling. You 20 know, I don't have chickens in my backyard but 21 if I want to, I want to be able to have chickens 22 in my back yard. Can't do that in the city. 23 Q Have you ever had chickens in your backyard? 24 A That's what I said. I haven't but I might want 25 to.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q Baker Tilly report? 2 A Yeah. 3 Q Other than looking at Baker Tilly report, do you 4 have any -- we're going to mark that. 5 A Oh, sorry. 6 Q Other than the Baker Tilly report, do you have 7 any foundation or knowledge of the financial 8 impact of other or overlapping taxing 9 authorities? 10 A I do not, no. Just common sense, right. 11 Q Have your property taxes increase in the last 12 five years? 13 A Yes, they have. And I hate to say this out 14 loud, I don't know how much because my husband 15 does all that stuff at home because that's 16 what's I do for a living. But, yes, it has 17 increased -- I'm sorry? 18 Q What do you do? 19 A I'm an office manager. So I do all kinds of 20 things. 21 Q Do you know by what percentage over the last 22 five years the property taxes have increased? 23 A I do not. I'm sorry. 24 Q Do you understand that the reasons for the tax 25 increases is the increase in assessed value on</p>
<p style="text-align: right;">Page 23</p> <p>1 Q Do you any present intent to buy chickens? 2 A I do not. But I do love free-range chickens. 3 Let's see here. Yeah, I want to speak about -- 4 so if the county is annexed into the city, there 5 will be less revenue for the Monroe County Fire 6 Protection, the Monroe County Library, and 7 Monroe County School Corporation. So, again, 8 that will have a negative impact. 9 Q What is your basis for that statement? How do 10 you know that fire, library, and school will 11 have less money? 12 A Well, they receive taxes from revenue, from 13 county tax. That's how they get revenue. So if 14 you take less away from them, it just makes 15 sense they will have less going to them. 16 Q Have you done an analysis to determine the 17 financial impact of the annexation on any of 18 those three: fire, library, or schools? 19 A I personally have not done an analysis. But I 20 have seen analysis and I have looked at it. I 21 am by no means, you know, someone who analyses 22 all the numbers. 23 Q Who prepared the analysis you looked at? 24 A I think it was the Tilly report. Is that 25 correct?</p>	<p style="text-align: right;">Page 25</p> <p>1 your property? 2 A I do. 3 Q Have you ever looked at the reports or letters 4 that you get from the assessor's office? 5 A Yes. Tell me if I miss something. 6 (Exhibit 47 marked.) 7 Q Can you just please confirm that Exhibit 47, 8 what's been marked as Exhibit 47 are the notes 9 that you were referring to earlier? 10 A Yes. 11 Q Thank you. 12 A You keep that? 13 Q We will. It will be a part of your transcript 14 so everybody will have a copy. 15 A I really should have checked my spelling. 16 Q I am going back. Is there any -- before I go 17 back. Any other reasons that you're opposed to 18 the annexation that you haven't identified that 19 are not in your notes that we have not talked 20 about yet? 21 A No, not off the top of my head. I'm sure if I 22 thought for a while I could come up with some. 23 Q Sure. If you think of any others as we go, 24 please let me know. 25 A Okay.</p>

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1 Q The first thing you said when I asked you why
 2 you oppose it, you made a comment about your
 3 safety. Being concerned for your safety, and
 4 you have used the sheriff a couple of times.
 5 What were the reasons for calling the sheriff's
 6 office?
 7 A Do you have kids, do you have teenagers by
 8 chance?
 9 Q I do.
 10 A Years ago, my son, he was 17, 18 years old. He
 11 was with his Christian group, and they all went
 12 Kings Island. Called me late at and said -- I
 13 mean it was, like, 11:00, I don't know -- "Hey,
 14 Mom, I'm on my way home. Got a couple of
 15 friends who need a place to stay. Can they come
 16 over?" Sure. He said, "I told them I will be
 17 there X amount of time." Okay. No worries.
 18 I'm asleep. And the way our bed is, is my
 19 son's bedroom is over here. My husband and I
 20 bed, here, (indicating) and I can see right
 21 through his room. And I woke up, and I see
 22 someone coming through his window. And I'm
 23 laying there. I'm shaking my husband. I'm
 24 going -- quietly because I think a burglar is
 25 walking in or getting in the house. So my

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1 husband gets up. Well, we saw, you know, they
 2 went out the window. I called 911. They showed
 3 up, and I sent a text to my son. I said, "Hey,
 4 when you get here, don't be alarmed. The police
 5 will be here. Someone just tried to break in."
 6 Got a phone call "No, no, no, Mom. Those are my
 7 friends. Those are my friends that I told you
 8 about."
 9 So we had a conversation -- the friends
 10 were down the road -- up the road in the car
 11 waiting for him to get home. We got them.
 12 Brought them in and explained to them how
 13 dangerous what they had just done was.
 14 Q During the course of that scenario, did the
 15 sheriff's department show up?
 16 A They did. I actually called to them that they
 17 could not -- they didn't need to come. They
 18 came anyways because they had to because I
 19 called and reported it.
 20 Q Do you remember how long --
 21 A I don't know.
 22 Q -- it took for them --
 23 A My son's in his 30s and he was a teenager.
 24 Q So this was 15 to 20 years ago?
 25 A Yeah. Another time we called the fire

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1 department, it wasn't the police department. It
 2 was the fire department. Had a flu fire, and it
 3 was out. When we got there, we realized it was
 4 a flu fire. We thought it was out. They
 5 insisted that they had to go up. And they went
 6 up.
 7 Q What year was that?
 8 A I believe that was before we were married. So
 9 we will be celebrating 25 years next month. So
 10 in the last 28 years. It was not soon after we
 11 moved in. 'Cause we had the flu cleaned
 12 afterwards.
 13 Q You mentioned that your understanding is the
 14 Bloomington Police Department has been
 15 understaffed. What is that based on?
 16 A I have read many documents in the news letter --
 17 I'm sorry, the Herald-Times and in the IDS, it's
 18 talked about it multiple times.
 19 Q You understand that the city, in 2020 and 2021,
 20 contracted with a third party to do analysis of
 21 the police department and its staffing and
 22 scheduling?
 23 A I am not aware of that, no.
 24 Q Have you ever heard of the Novak report?
 25 A No.

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1 Q So you haven't ever seen a copy of the Novak
 2 report?
 3 A Not that I'm aware of.
 4 Q Okay. Talk about property taxes for a minute or
 5 two here. Do you understand that you have a
 6 homestead exemption on your property?
 7 A Again, my husband. I have heard of homestead
 8 exemptions, but I'm not quite sure.
 9 Q Not sure how it applies to your property or your
 10 tax bill. Is that fair?
 11 A That's fair.
 12 Q Do you have a mortgage on your property?
 13 A Yes.
 14 Q Do you know if you have the mortgage exemption
 15 filed with the county?
 16 A I'm not sure. I don't know. Again, I'm sure
 17 whatever is legal, he's done it. But I can't
 18 speak for him.
 19 Q Other than property tax increase, potential
 20 property tax increase, are there -- will the
 21 annexation cost you money out of your pocket in
 22 other ways?
 23 A What do you mean "other ways"? I thought I
 24 already went over that.
 25 Q Other than property taxes. So you've talked

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1 about your waste removal provider. Are there
2 other financial impacts to you, not am
3 extrapolating out to third-party businesses
4 raising prices because of taxes. But things
5 that you know, specifically, will cost you more
6 because of the annexation other than property
7 taxes and maybe the waste removal?
8 A And the fire tax. I will be being taxes twice
9 with that.
10 Q Anything else?
11 A Not that I'm aware of.
12 Q Do you understand your sewer bill would go down?
13 A I assume it would. It better. You know, 'cause
14 I'm a freeloader.
15 Q I have heard that.
16 A Yeah, I've heard that too.
17 Q What -- free rider. Have you done an analysis
18 by how much your sewer bill would go down?
19 A I have not. I have no interest. I bet it's not
20 \$780.
21 Q What is \$780 represent? Is that your tax
22 increase?
23 A I think so. Around there.
24 Q Do you know if homeowner's insurance premium
25 would go up, down, stay the same with the

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1 annexation?
2 A I don't know.
3 Q Do you know how the City of Bloomington's
4 municipal tax rate compares to other cities in
5 the state of Indiana?
6 A No.
7 Q I want to give you some exhibits, one at a time
8 here. Starting with Exhibit 48. I'm going to
9 give you two. One for you and one for Bill.
10 You get the one with the sticker.
11 So on Exhibit 48, you see the address at
12 the top of the page?
13 (Exhibit 48 marked.)
14 MR. BEGGS: That's --
15 A I'm sorry. I miss understood him.
16 Q The top of the page, there's an address. 3822
17 South Yonkers Street. Is that your address?
18 A Yes.
19 Q Are those pictures there, pictures of your
20 house?
21 A Yes.
22 Q You see on the bottom right-hand corner, there's
23 a number stamp. If you would go to the one that
24 ends 157. See the transfer ownership table
25 there?

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1 A Yes.
2 Q You see the last entry there, Rhonda S. and
3 George P. Gray. October 30, 2009. Do you see
4 that?
5 A Yes.
6 Q But the owner before was George P. Gray, March
7 25, 1997. Do you see that?
8 A Yes.
9 Q Was there a time when either --
10 A Do you want me to answer it? I know what --
11 Q Yes. It's been a long day.
12 A Yeah. It's fine. We lived the other three
13 years before we got married. So he purchased
14 the house. I and my children lived with him,
15 and then, when we got married in -- gosh, when
16 did we get married? '09? That year we
17 jointly -- he added me to the house.
18 Q Okay. So he bought the house in '97. You were
19 added to the deed in 2009. I think you said you
20 had your 25 anniversary coming up.
21 A Correct.
22 Q So that might have been 10 years after you guys
23 got married. 2009 is 15 years ago. Catching up
24 on the paperwork, perhaps?
25 A I'm not sure.

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1 Q But at least --
2 A The only thing I can think of is -- you said 10
3 years ago? We refinanced 10 years ago.
4 Q Well, at least, according to this from the
5 assessor's office, you show up on the warrantee
6 deed in 2009. And at least since then, you've
7 been a titled homeowner; correct?
8 A Correct. And I will need to check this because
9 I think it's incorrect.
10 Q Go to the next page. Page ending with 158.
11 This is -- you see the valuation record table
12 there? You have to say "Yes."
13 A Yes.
14 Q For 2022, you see the row, it's the second row
15 from the top? 2022-04-08?
16 A Yes.
17 Q So April 8 of two years ago, the total valuation
18 is \$243,400. Do you see that?
19 A I do, yes.
20 Q Are you familiar with the property tax cap laws
21 in the state of Indiana?
22 A No.
23 Q Have you heard that there's either
24 constitutional limit or a legal limit on the
25 amount you can be taxed -- your property taxes

<p style="text-align: right;">Page 34</p> <p>1 can be assessed compared to the assessed value 2 of your home? 3 A No. 4 Q Have you heard of the 1 percent tax cap on 5 property taxes? 6 A I have heard of the 1 percent, but I don't think 7 we're talking about the cap, no. 8 Q Have you heard of the 1 percent cap in the 9 property tax concept? 10 A No. 11 Q If you look at assessed value in 2018, you see 12 where it \$136,400? 13 A Yes. 14 Q And then by 2022, it's \$243,400. So it's gone 15 up over \$100,000. Do you have any understanding 16 as to why that occurred? 17 A COVID. Isn't everything COVID's fault? 18 Q Did you add on or do additions to your house or 19 your -- 20 A Oh, yeah. We have added. I mean we've not 21 added on. We've done -- we just not added on 22 but we renovated. 23 Q What renovations have you done in the last five 24 years? 25 A New siding -- last five years?</p>	<p style="text-align: right;">Page 36</p> <p>1 Q If you look on the second page of Exhibit 49 2 page ending 151, there's a tax history section. 3 Do you see that? 4 A Yes -- well. 5 Q At the very bottom? 6 A Yes. 7 Q So if you look at tax history for the pay year 8 2019 -- do you understand, by the way, for 9 property taxes that the terminology is you're 10 assessed one year, and you pay the next year; so 11 assessed 2018, pay 2019? 12 A Pay the next year. 13 Q Are you familiar with that? 14 A No, but I am now. 15 Q Do you see in 2019, the tax bill for the spring 16 of \$421.68? 17 A Yes. 18 Q And then an equal amount for the fall for 2018? 19 A Yeah. 20 Q I'm sorry, 2019. 21 A Yes, spring and fall. I see it. 22 Q For a total of tax liability of \$843.36. Do you 23 see that? 24 A Yes. 25 Q Do you understand that with your mortgage on</p>
<p style="text-align: right;">Page 35</p> <p>1 Q Yes. 2 A Kitchen. We just did a renovation here in the 3 last year. So we put in new floors and new 4 lights. Mainly new floors and just painted. My 5 husband built a beautiful -- I don't know what 6 you call it -- it's got our TV on it and our 7 fireplace. 8 Q An interior improvement to the home? 9 A Yes. But no one has seen it. Not to be 10 assessed. It will be a lot more next year. 11 Q Usually they don't go inside. So I've given you 12 Exhibit 49 -- 13 (Exhibit 49 marked.) 14 A This is what the ugly house used to look like. 15 I love this after. 16 Q One of those is -- the one without the sticker 17 is for Bill. 18 A Sorry, Bill. I'm holding on to all your stuff. 19 Q So that Exhibit 49. Do you see on the first 20 page, your street address, 3822 South Yonkers 21 Street? 22 A Yes. 23 Q And to the right of that, your name and your 24 husband's name? 25 A Yes.</p>	<p style="text-align: right;">Page 37</p> <p>1 your property, the escrow company pays -- 2 actually does the physical payment of the 3 property taxes to the county? 4 A Yes. 5 Q But you pay some amount each month to the 6 escrow? 7 A Yes, I do understand. 8 Q Then 2023, the total tax liability is \$1,914.88. 9 Do you see that? 10 A Yes. 11 Q That's more than twice the amount it was in 12 2019. You agree with me? 13 A Yes. 14 Q And that's just based on the assessed value 15 alone; correct? 16 A Yes. 17 Q You haven't moved or tried to sell your house 18 between 2019 and 2022? 19 A We entertained moving a couple of years ago when 20 all this was going on, but we never made a deal 21 or anything. 22 Q Have you ever reviewed the City of Bloomington's 23 fiscal plan? 24 A No, that I am aware of I should say. 25 Q Do you have any information to suggest that the</p>

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1 city's fiscal plan does not somehow comply with
 2 Indiana law?
 3 A No.
 4 Q You don't know one way or the other?
 5 A I don't know one way or the other.
 6 Q Do you know whether the fiscal plan represent a
 7 credible commitment of City of Bloomington to
 8 provide noncapital services like police,
 9 sidewalks, streetlights to people in the
 10 annexation areas at the same equivalent standard
 11 that they supply to city residents?
 12 A I do not know that.
 13 Q Do you know if the fiscal plan represents a
 14 credible commitment from the city to provide
 15 capital services, road construction and things?
 16 A I don't know anything about --
 17 MR. BEGGS: Object to form and foundation.
 18 THE WITNESS: I'm sorry?
 19 MR. BEGGS: Go ahead.
 20 A I do not know anything about the fiscal plan if
 21 that helps.
 22 Q Short circuit answer.
 23 A I'm happy to answer but I ...
 24 Q Do you have any information about the population
 25 density on a persons per acre basis for Areas 1A

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1 or 1B?
 2 A I personally do not.
 3 Q Do you have any information on the zoning --
 4 percentage of zoning classifications in Area 1A
 5 or 1B between residential, commercial,
 6 industrial?
 7 A No.
 8 Q Do you have any information on the percentage of
 9 land that's subdivided in Area 1A or 1B?
 10 A When you say information, you are wanting me to
 11 tell you if I know what it is? Or if I can get
 12 you the information?
 13 Q No. If you know what it is.
 14 A Okay. No.
 15 (Exhibit 28 previously marked.)
 16 Q So you should have Exhibit 28 in front of you.
 17 If you look on page 2, Question 3. Says
 18 "Identify each fact witness you plan to call to
 19 testify in this lawsuit and provide a summary of
 20 anticipated testimony."
 21 Do you see that?
 22 A I do.
 23 Q Then if you go to page 4, the third name from
 24 the top of the page is Rhonda Gray.
 25 Do you see that?

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1 A Yes.
 2 Q Says "If called, Ms. Gray would be asked to
 3 testify as a landowner about her opposition to
 4 annexation, city services versus otherwise
 5 provided services, and the impact of annexation
 6 upon her."
 7 Do you see that?
 8 A Yes.
 9 Q Is there anything to add to what you previously
 10 testified about with respect to any of those
 11 topics? Anything come to mind that you haven't
 12 told me about already?
 13 A "As a landowner about her ... city services
 14 versus" -- As far as being annexed, my
 15 opposition about why I think I shouldn't be
 16 or --
 17 Q Yes.
 18 A -- or why I think this wasn't done the way that
 19 it should be?
 20 Q The first.
 21 A The first. Not that I can recall. I believe I
 22 covered everything I can think of off the top of
 23 my head.
 24 Q Now with respect to the second, it not being
 25 done the way it should be, what are your

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1 objections to process?
 2 A I just don't think it was handled the way it
 3 should have been during a pandemic, which we've
 4 covered.
 5 Q Anything other than that or in addition to that
 6 that we covered last time about it being
 7 conducted in the pandemic?
 8 A No.
 9 Q Did you, by chance, look back through your prior
 10 deposition before coming here today?
 11 A Yes.
 12 Q Oh, on Exhibit 28, if you go to page 5, Question
 13 Number 5 says "Identify and list all facts and
 14 documents supporting your contention in the
 15 petition that the Ordinance Nos. 17-09 and 17-10
 16 fail to include equitable terms and conditions
 17 as required by the Indiana Code and identify
 18 witnesses." Do you see that?
 19 A I see that.
 20 Q Go to page 6. The fourth paragraph down, the
 21 one that starts Thomas McGhie, John Byers. You
 22 see your name there at the end, Rhonda Gray, "is
 23 anticipate to testify that she was not offered
 24 an in-lieu-of agreement despite the fact that
 25 other property owners in Areas 1A and/or 1B were

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1 offered such an agreement."
 2 Do you see that?
 3 A I do.
 4 Q Do you know what an agreement in lieu of
 5 annexation is?
 6 A My understanding is I would be able to pay money
 7 instead of being annexation.
 8 Q Is that something you think the city of
 9 Bloomington should have offered you as an
 10 option?
 11 A I think if it offered some in the area, I think
 12 everyone should have been offered that, yes.
 13 Q Do you know who or which landowners were offered
 14 an agreement in lieu of annexation?
 15 A I heard the Cook group was.
 16 Q You heard that. But you haven't actually seen
 17 the agreement itself?
 18 A Correct.
 19 Q Would you be willing to pay 75 percent of the
 20 City's tax rate not to be annexed?
 21 A What would that be?
 22 Q 75 percent of 2.2 percent times your assessed
 23 value less any caps or deductions, exemptions?
 24 A I'm not sure.
 25 Q What terms or condition do you think would be

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1 appropriate for an agreement in lieu of
 2 annexation offered to your property?
 3 A The terms would be keep them like they are.
 4 There's no reason change it.
 5 Q To kind of close this out, is there anything
 6 else now that you've a chance to hear my
 7 questions, give my answers -- give your answers,
 8 and any follow-up questions I might have asked,
 9 is there anything else about your opposition to
 10 the annexation that comes to your mind that we
 11 have not already talked about?
 12 A No.
 13 MR. MCNEIL: I have no further questions.
 14 MR. BEGGS: No questions. Thank you very
 15 much. Signature.
 16 (Time noted: 4:38 p.m.)
 17 AND FURTHER THE DEPONENT SAITH NOT.
 18
 19
 20
 21 _____
 22 RHONDA GRAY
 23
 24
 25

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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 RHONDA GRAY, 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, Bloomington, Monroe County, Indiana, on
 13 the 27th day of February 2024, commencing at the
 14 hour of 3:51 p.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

Page 45

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
 9 *Colleen Brady*
 10 Colleen Brady
 11
 12 Seal, Notary Public My Commission Expires:
 13 State of Indiana March 8, 2029
 14 Colleen Brady County of Residence:
 15 Commission No. NP0732235 Monroe
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

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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: Rhonda Gray Deposition Date: 2/27/2024
11
12 Dear Sir/Madam:
13
14 The deposition transcript taken in the above-referenced
15
16 matter, with the reading and signing having not been
17
18 expressly waived, has been completed and is available
19
20 for review and signature. Please call our office to
21
22 make arrangements for a convenient location to
23
24 accomplish this or if you prefer a certified transcript
25
26 can be purchased.
27
28 If the errata is not returned within thirty days of your
29
30 receipt of this letter, the reading and signing will be
31
32 deemed waived.
33
34 Sincerely,
35
36 Production Department
37
38 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: Rhonda Gray
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 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 _____
Rhonda Gray
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
13 They have read the transcript;
They signed the foregoing Sworn
Statement; and
14 Their execution of this Statement is of
their free act and deed.
15
16 I have affixed my name and official seal
17 this _____ day of _____, 20____.
18
19 _____
Notary Public
20
21 _____
Commission Expiration Date
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: Rhonda Gray
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.
7 I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
8 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
that both be appended to the transcript of my
12 testimony and be incorporated therein.
13
14 Date _____
Rhonda Gray
15
16 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:
17 They have read the transcript;
They have listed all of their corrections
18 in the appended Errata Sheet;
They signed the foregoing Sworn
19 Statement; and
Their execution of this Statement is of
20 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

Page 49

1 ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
2 ASSIGNMENT NO: 2/27/2024
3 PAGE/LINE(S) / CHANGE /REASON
4 _____
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 Date _____
Rhonda Gray
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.

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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.

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