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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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RAYMING CHANG, et al., :  
: Plaintiffs, :  
v. : Civil Action No. :  
: 02-02010 (EGS) (AK) :  
UNITED STATES, et al., :  
: Defendants. :  
----- x

JEFFREY BARHAM, et al., :  
: Plaintiffs, :  
v. : Civil Action No. :  
: 02-02283 (EGS) (AK) :  
CHIEF CHARLES H. RAMSEY, :  
et al., :  
: Defendants. :  
----- x

JULIE ABATE, et al., :  
: Plaintiffs, :  
v. : Civil Action No. :  
: 03-00767 (EGS) (AK) :  
CHIEF CHARLES H. RAMSEY, :  
et al., :  
: Defendants. :  
----- x

JOEL DIAMOND, et al., :  
: Plaintiffs, :  
v. : Civil Action No. :  
: 03-02005 (EGS) (AK) :  
DISTRICT OF COLUMBIA, et al., :  
: Defendants. :  
----- x

DEPOSITION OF MARK JACKSON

Washington, D.C.  
Wednesday, July 28, 2004

The deposition of MARK JACKSON, called for examination by counsel for Defendant in the above-entitled matter, pursuant to notice at the Office of the Attorney General for the District of Columbia, One Judiciary Plaza, 441 Fourth Street, N.W., Sixth Floor South, Washington, D.C., convened at 10:29 a.m., before Donald J. Jacobsen, a notary public in and for the District of Columbia, when were present on behalf of the parties:

APPEARANCES:

On behalf of the Plaintiffs:

ZACHARY JAY WOLFE, ESQ.  
Partnership for Civil Justice, Inc.  
1901 Pennsylvania Avenue, N.W.  
Suite 607  
Washington, D.C. 20006  
(202) 530-5630

On behalf of the Defendant District of  
Columbia:

MARTHA MULLEN, ESQ.  
Assistant Attorney General  
Office of the Attorney General  
for the District of Columbia  
One Judiciary Plaza  
441 Fourth Street, N.W.

1 Attorney has a copy as well.

2           Would you please turn to page 9? In the  
3 third paragraph, you describe--you have a narrative  
4 answer that describes what happened when you were  
5 being processed. And at the last of the third  
6 paragraph, you state that an officer that you were  
7 talking to emphasized that the court would be full  
8 and that I would probably end up being held until  
9 Monday or Tuesday in prison, where he said they,  
10 bracket, the other prisoners, close bracket, will  
11 like a little white boy like you.

12           A     That was Big Ron.

13           Q     And did he laugh when he said that?

14           A     Kind of smilingly said it, yes.

15           Q     The implication seems obvious. We're all  
16 adults here. How did that statement make you feel?

17           A     I was hoping that he was joking. I  
18 wasn't, like, fearful, but I thought it was in poor  
19 taste.

20           Q     But you were not intending to go to the  
21 D.C. Jail to be held so that you could come before  
22 a magistrate judge or any judge for that matter.

1           A     Well, initially, I had thought that I  
2 would be allowed to be given a court date at some  
3 later point that I could then set up to make an  
4 arrangement in my schedule and go to. But when I  
5 asked for that, they said that was not the case;  
6 that we would all have to go up in front of a court  
7 and, one by one, on Saturday, and since the court  
8 was only open until 12:00 or so--this is what I was  
9 told--that probably--this is, again, Big Ron or  
10 whatever his real name was or his real nickname,  
11 even, said that to me. And so, he said you're  
12 probably not going to get in Saturday, so you're  
13 going to be there at least until Monday, and he  
14 said maybe later.

15                     And since I had to teach on Monday morning  
16 at GW, I acquiesced.

17           Q     So you thought it in your best interests  
18 to go ahead and post and forfeit.

19           A     Even though I told him that I was innocent  
20 of failing to obey, since I had followed every  
21 order given to me that day by any police officer, I  
22 knew I was innocent of that charge, but I did not