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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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 RAYMING CHANG, et al., :  
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 Plaintiffs, :  
 v. : Civil Action No.  
 : 02-02010 (EGS) (AK)  
 UNITED STATES, et al., :  
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 Defendants. :  
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 JEFFREY BARHAM, et al., :  
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 Plaintiffs, :  
 v. : Civil Action No.  
 : 02-02283 (EGS) (AK)  
 CHIEF CHARLES H. RAMSEY, :  
 et al., :  
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 Defendants. :  
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 JULIE ABATE, et al., :  
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 Plaintiffs, :  
 v. : Civil Action No.  
 : 03-00767 (EGS) (AK)  
 CHIEF CHARLES H. RAMSEY, :  
 et al., :  
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 Defendants. :  
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 JOEL DIAMOND, et al., :  
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 Plaintiffs, :  
 v. : Civil Action No.  
 : 03-02005 (EGS) (AK)  
 DISTRICT OF COLUMBIA, et al., :  
 :  
 Defendants. :  
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DEPOSITION OF NICOLE DJEDDAOUI

Washington, D.C.  
Monday, June 7, 2004

The deposition of NICOLE DJEDDAOUI, called for examination by counsel for Defendants in the above-entitled matter, pursuant to notice, at the Office of the Attorney General for the District of Columbia, 441 Fourth Street, N.W., Sixth Floor South, Washington, D.C., convened at 10:38 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:

CARL MESSINEO, ESQ.  
Partnership for Civil Justice  
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On behalf of Defendant District of  
Columbia:

THOMAS L. KOGER, ESQ.  
Assistant Attorney General  
Office of the Attorney General  
for the District of Columbia  
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Sixth Floor South  
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(202) 724-6610

1 would say 9:00ish.

2 Q Would that be the first time or the second  
3 time?

4 A The first time.

5 Q When was the second time?

6 A The second time would have been sometime  
7 early morning the next day, around 5:00.

8 Q Did you leave the gym at any point after  
9 you entered the gym aside from to go to the  
10 bathroom?

11 A No.

12 Q How is it that you came to be released?

13 A I was trying to understand what my options  
14 were for being released, and I didn't have money to  
15 pay a fine or the fee to get out, and so, I was one  
16 of the last ones to be released in the morning, and  
17 they just, I don't know, let me go.

18 Q Try to think back--withdrawn. At some  
19 point in time, you came to understand that if you  
20 were able to make a payment of some sort, you could  
21 be released; is that right?

22 A That's right.

1 Q What was it that you learned that  
2 information?

3 A We were told that if we paid \$50 and  
4 wanted to admit guilt, we could be released.

5 Q Did they have any shorthand term for that?

6 A Yes; something--there was, like, three  
7 options, post and forfeit and something like that;  
8 I don't remember exactly the terms that they used.

9 Q Okay; let me back up a little bit. At  
10 some point, someone said there's more than one way  
11 out of here.

12 A That is correct; they were giving us three  
13 options.

14 Q Do you remember when that information came  
15 to you?

16 A That came to us when we were outside.

17 Q And your understanding--what was your  
18 understanding of the post and forfeit option?

19 A I did not understand it at all. It was  
20 very confusing.

21 Q Without the name of what the other two  
22 options may have been, what do you recall about

1 what was entailed in each of the other options?

2 A One of the options was to see a judge, but  
3 they informed us that that would not be possible  
4 since it was the weekend, so we would have to be  
5 held in jail until Monday, when we could see a  
6 judge.

7 Q Do you remember what the third option was?

8 A The third option was to pay--I think it  
9 was to pay a fine, but then, you would have to show  
10 up in court at a later date.

11 Q As it turned out, you were released on a  
12 basis that was not any of those three options; is  
13 that right?

14 A I think that's correct.

15 Q When did that possibility come to your  
16 attention?

17 A I don't remember exactly.

18 Q Do you remember whether it was Friday  
19 versus Saturday?

20 A No.

21 Q What, if anything, do you recall about the  
22 way that possibility of being released without