#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

KATERI LYNNE DAHL,
Plaintiff,

VS.

CHIEF KARL TURNER, in his individual capacity only; OFFICER JOHN DOES 1-3, in their individual capacities only; and CITY OF JOHNSON CITY,

Defendants.

CASE NO.

\* 2:22-CV-00072-KAC-CRW

DEPOSITION OF

### JEFF LEGAULT

(Taken October 17, 2023)

## APPEARANCES:

COUNSEL FOR THE PLAINTIFF:

HUGH A. EASTWOOD

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ALEXIS I. TAHINCI TAHINCI LAW FIRM

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# COURT REPORTING AND VIDEO SERVICES

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TELEPHONE: (423) 230-8000 REBECCA@COURTREP.NET

- 1 It's an E-mail that I sent to Chief Turner and Captain 2 Peters of some cases that they requested.
- 3 And if we look at what I believe is the attachment, is 4 that correct, was the list an attachment to the E-mail?
  - I don't -- I don't remember if it was an attachment or if was something I typed up and gave to Captain Peters. can't -- I don't remember if it was sent as an attachment or not.
- And you say that Captain Peters requested that you create 10 this list?
- 11 Α. Yes.

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- 12 Q. And do you know why he requested that you create this 13 list?
- 14 A. Yes.
- 15 Q. Tell me more.
- 16 My displeasure of cases being prosecuted through the 17 federal system. I went up and spoke to him about my 18 displeasure several times about getting our cases 19 prosecuted, and at some point we had a discussion and he 20 asked me to make a case -- make a list of cases that were 21 being prosecuted.
  - When did you first have a discussion with him? Was this verbal?
- 24 Α. Yes.

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23

25 When did you first have a discussion with him about your

JEFF LEGAULT

DIRECT - EASTWOOD

- 1 | displeasure?
- 2 A. If this was in December, it had to be several months
- 3 before. I don't know the exact dates.
- 4 | Q. Maybe summer or fall?
- 5 | A. Yeah.
- 6 | Q. But not spring or winter?
- 7 A. I don't recall when I -- there was quite -- I mean, I was
- 8 -- cases weren't moving, so I don't remember when it was
- 9 | that I had it.
- 10 | Q. Did this displeasure arrive after COVID?
- 11 A. I'd say it was probably mid COVID and after.
- 12 | O. But not before COVID?
- 13 A. No.
- 14 | Q. Have you ever created a list of cases like this before?
- 15 A. No.
- 16 Q. Whose idea was it to create a list of cases?
- 17 A. I believe it was Captain Peters wanted to know the list of
- 18 cases, and I told him I would do it.
- 19 | Q. I see you sent it to the chief and copied Captain Peters.
- 20 Why did you do that?
- 21 A. If I believe, I think Captain Peters told me to send it to
- 22 Chief and copy him on the E-mail.
- 23 | Q. Did you normally communicate directly with the chief?
- 24 A. No.
- 25 | Q. And why is that?

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#### CERTIFICATE

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of JEFF LEGAULT was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 6th day of November, 2023.

CAL OVER

Rebecca Overbey
LICENSED COURT REPORTER
State of Tennessee
LCR #078

My License Expires:

June 30, 2024

\*\*\*CERTIFIED ONLY IF AFFIXED SEAL IS GREEN\*\*\*