

EXHIBIT

F

(Portions of Plaintiff's Deposition Transcript)

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 THOMAS D'ANGELO,

5 Plaintiff:

6 -vs-

7 Case No. 2:10-c-12195
8 Hon. Lawrence P. Zatkoff
9 Magistrate Judge Mona Majzoub

10 PAUL PARENT, CLINTON TOWNSHIP, a
11 municipal entity, NICHOLAS DYKAS,
12 JASON FIGURSKI and KEITH WATSON, in
13 their official an individual capacities,
14 jointly and severally,

15 Defendants:

16 _____/

17 STATE OF MICHIGAN

18 IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB
19 THOMAS D'ANGELO,

20 Plaintiff:

21 -vs-

22 Case No. 10-944 NO
23 Hon. Matthew S. Switalski

24 PAUL PARENT, CLINTON TOWNSHIP, a
25 municipal entity, NICHOLAS DYKAS,
26 JASON FIGURSKI and KEITH WATSON, in
27 their official and individual capacities,
28 jointly and severally,

29 Defendants:

30 _____/

31 The deposition of THOMAS D'ANGELO, taken
32 before Lisa M. Fix, a Certified Shorthand Reporter and
33 Notary Public for the County of Wayne, State of
34 Michigan, at 615 Griswold, Suite 1115, Detroit,
35 Michigan, on Thursday, the 16th Day of December, 2010,
36 at 2:00 p.m.

1 Q Okay.

2 A But I told the officer to -- if I was allegedly
3 looking at pornography to check with the computer
4 text because they could probably pull it up and
5 find out what I was looking at.

6 Q Do you know if they ever did that?

7 A I don't know.

8 Q Okay. Didn't come out at trial?

9 A What?

10 Q It didn't come out at trial whether or not they
11 looked at the computer or the tech looked at
12 the --

13 A The library personnel?

14 Q Right. Right.

15 A No, not that I'm aware of.

16 Q Okay. All right. So you're led out of the
17 library, then what happens?

18 A Well, he opened the back seat of the car and I sat
19 down, I was still handcuffed, and my feet were
20 hanging out of the car, you know, like sideways.

21 Q Okay. So he opens the door, you're cuffed behind
22 your back, correct?

23 A I'm cuffed, yes.

24 Q You sit down in the car with your legs still
25 extended out, correct?

1 A Yeah, I'm kind of like sideways, you know.

2 Q Right. Right.

3 A With my legs sticking out of the car, yeah.

4 Q What happened then?

5 A Well, what happened was nothing. I was sitting
6 there, I was thinking that they're going to check
7 with the computer tech, and they were going to let
8 me go, you know, because I didn't do what I was
9 accused of, and then what happened at some point
10 was the officer that put me in the car, he reached
11 down and took my legs and he shoved them real hard
12 into the car.

13 Q Took your legs --

14 A And he pushed them really hard.

15 Q Pushed or took? You said took your legs.

16 A Well, you know, he reached down beside my legs and
17 he -- because I was sitting with my --

18 Q Right.

19 A -- knees out, you know --

20 Q Uh-huh.

21 A -- like sideways to the car.

22 Q Correct. Right.

23 A And so he reached down and grabbed this leg like
24 this and he shoved both of them in real hard.

25 Q Did he turn you all the way around?

1 A Pretty much, yeah, to get me in the car, yeah,
2 totally into the car.

3 Q Okay. Then what happened? Did you say anything
4 to the officer?

5 A Did I say anything?

6 Q Right.

7 A Yeah, I remember I yelled like ouch, you know,
8 because he -- when he shoved my legs in my left
9 knee hit the doorjamb of the car pretty hard.

10 Q Okay. Is that's what's depicted in the
11 photographs that were attached to Answers to
12 Interrogatories?

13 A Yes.

14 Q So then you're in the vehicle; is that correct?

15 A Yes.

16 Q Okay. And forgive me, what did you say again to
17 him when he put your legs in the car? Did you say
18 anything to him?

19 A I didn't say anything. I think I yelled.

20 Q Why?

21 A Because he hurt my knee.

22 Q Then what happened?

23 A Then he got into the squad car.

24 Q Again, this is Officer Figurski, as far as you
25 recall?

1 A Sure. Yeah.

2 Q Tell me about that.

3 A Well, during the whole time, you know, I was very
4 stressed, because again I couldn't understand why
5 I was arrested and prosecuted for something I
6 didn't do.

7 Q After the trial and the verdict came back did that
8 relieve the stress?

9 A Some of it, yeah.

10 Q You still have some added stress in your life
11 because of what occurred?

12 A Yeah.

13 Q Tell me about that.

14 A Well, it's like I mentioned earlier, you know,
15 when I go out and I see police I get anxious, and
16 that kind of a thing.

17 Q Other than that, the police, what other added
18 stress or anxiety do you have?

19 A Nothing I can recall at this moment.

20 Q And the only -- and you've not received any kind
21 of medication as a result of this incident; is
22 that correct?

23 A No medication, although I do use cream for the
24 pain on my knees sometimes.

25 Q Oh.

1 A Like pain cream.

2 Q What's the medication you use for your knees?

3 A It's over-the-counter stuff.

4 Q What is it?

5 A I don't know. There's several different kinds.

6 Q You don't know what it is?

7 A Ah, like the creams.

8 Q What's it for?

9 A Well, my knee hurts sometimes.

10 Q What do you mean it hurts?

11 A Well, when I go out and it's rainy or it's cold it
12 hurts -- it hurts me sometimes.

13 Q So weather affects it?

14 A Yeah.

15 Q Tell me where it affects it in the knee.

16 A It's the area below the kneecap.

17 Q Show me where it is.

18 A You want to see my knee?

19 Q Just show me where the pain is.

20 A It's right where that knot is that's sticking out
21 there.

22 Q Okay.

23 A Here's the kneecap. I don't know what it is.

24 Q And you haven't seen a doctor for that?

25 A No.

1 arrested me.

2 Q Okay.

3 A Because they never responded.

4 Q Do you know what basis they had to arrest you?

5 MR. KUHN: Same objection,
6 calls for speculation.

7 MR. PEACOCK: No, no, no, it
8 doesn't. It says do you know. If you don't know,
9 say I don't know.

10 THE WITNESS: No, I don't
11 know.

12 Q (Continuing by Mr. Peacock) Okay. Now, in your
13 Answers to Interrogatories, I think also in your
14 complaint -- well, have you received any kind of
15 medical treatment as a result of this arrest?

16 A No.

17 Q Any psychological treatment?

18 A No.

19 Q Psychiatric treatment?

20 A No.

21 Q Gone to a priest or a pastor?

22 A No, I don't go to church.

23 Q Okay. Sought any counseling from anybody other
24 than your lawyer?

25 A Well, just friends, you know.