

**In The Matter Of:**  
*ELIZABETH BECKLEY vs.*  
*CITY OF ATLANTA, GEORGIA*

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*LAWRENCE JETER*  
*November 17, 2016*  
*30(b)(6) DEPOSITION*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

ELIZABETH BECKLEY,

Plaintiff,

vs.

CITY OF ATLANTA, GEORGIA,

Defendant.

CIVIL ACTION

FILE NO.

1:16-cv-01435-MHC

RULE 30(b)(6) DEPOSITION OF

CITY OF ATLANTA, GEORGIA by

LAWRENCE JETER

Thursday, November 17, 2016  
10:09 a.m.

55 Trinity Avenue, S.W.  
Suite 5000  
Atlanta, Georgia

Jennifer Goodrich, RPR, CCR-5084-0657-3249-3312

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PLAINTIFF'S

EXHIBIT

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(Original Exhibits 1 through 3 have been attached  
to the original transcript.)

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APPEARANCES OF COUNSEL

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[1] (Reporter disclosure made pursuant to  
[2] Article 10.B of the Rules and Regulations of the  
[3] Board of Court Reporting of the Judicial Council  
[4] of Georgia.)

[5] **MR. RADFORD:** This will be the deposition  
[6] taken of the City of Atlanta pursuant to Rule  
[7] 30(b)(6) of the Federal Rules of Civil Procedure,  
[8] in the case of Elizabeth Beckley versus the City  
[9] of Atlanta, Georgia. Currently pending in the  
[10] US District Court for the Northern District of  
[11] Georgia. This deposition is taken pursuant to  
[12] notice.

[13] My name is James Radford, I'm the attorney  
[14] representing the plaintiff. I'd ask the witness,  
[15] sir, if you could please identify your name for  
[16] the record.

[17] **MR. JETER:** Yes. Lawrence Jeter,  
[18] J-e-t-e-r.

[19] **MR. RADFORD:** And, Mr. Jeter, are you an  
[20] employee of the City of Atlanta?

[21] **MR. JETER:** Yes.

[22] **MR. RADFORD:** And tell me, what is your  
[23] position?

[24] **THE WITNESS:** I'm a public works senior  
[25] manager for the Department of Public Works;

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[1] Office of Transportation.  
[2] LAWRENCE JETER,  
[3] having been first duly sworn, was examined and  
[4] testified as follows:

[5] **CROSS-EXAMINATION**

[6] **BY MR. RADFORD:**

[7] **Q.** And, sir, not that it's a controversial  
[8] issue, but now that you've taken the oath can I ask  
[9] you to identify your position with the City of  
[10] Atlanta?

[11] **A.** Senior public works manager in the  
[12] Department of Public Works; Office of Transportation.

[13] **Q.** Okay. And are you aware that you've been  
[14] designated by the City of Atlanta to represent the  
[15] City's position on a number of issues that we've  
[16] requested that the City speak on today?

[17] **A.** Yes.  
[18] (Plaintiff's [Exhibit](#) 1 was marked for  
[19] identification.)

[20] **Q.** (By Mr. Radford) I'm going to show you  
[21] what I'm going to mark as Plaintiff's [Exhibit](#) 1, which  
[22] is a copy of what's called the 30(b)(6) notice that we  
[23] served on the City. And I guess take a brief moment  
[24] to look at this and tell me if you recognize it.

[25] **A.** Yes, I do.

[1] **A.** Yes. There are documents that were  
[2] generated as a result of a consent decree of 2009  
[3] where we were required to identify locations we had  
[4] resurfaced since 1992. And that document listed all  
[5] of those locations since then and it has additional  
[6] analytical information about total mileage, number of  
[7] streets, some other data.

[8] **Q.** And you said it's a spreadsheet document?

[9] **A.** Yes, it is.

[10] **Q.** Have you seen it in paper form or just in  
[11] electronic form?

[12] **A.** Just in electronic form, I didn't print it  
[13] out.

[14] **Q.** Okay. And where did you go to access that  
[15] document?

[16] **A.** We have an old storage drive. That  
[17] storage drive served our old Quality of Life Bond  
[18] Program. That program is now defunct. Is has been  
[19] renamed our Capital Projects Division, but that  
[20] server, storage drive, is still accessible.

[21] **Q.** And where did you go to actually view the  
[22] document?

[23] **A.** I accessed it from my office.

[24] **Q.** Okay. Do you actually have a copy of it  
[25] on some sort of drive in your possession?

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[1] **Q.** This is something you've seen before?

[2] **A.** Yes.

[3] **Q.** Okay. If you look at Page 2 there are six  
[4] topics that we've put in here and we've asked the City  
[5] to designate someone to speak on these topics. Have  
[6] you reviewed these topics?

[7] **A.** Yes, I have.

[8] **Q.** And are you prepared to speak on these  
[9] topics today?

[10] **A.** Yes.

[11] **Q.** Now just in a general sense, can you tell  
[12] me what sort of preparation you've done for your  
[13] deposition today?

[14] **A.** Yes. I reviewed documents on storage  
[15] drives. I've reviewed aerial maps about the subject  
[16] location. I've talked to some additional staff about  
[17] any issues concerning -- excuse me -- concerning the  
[18] intersection in question. And that's about it.

[19] **Q.** Okay. You said you looked at some  
[20] documents on storage drives, what documents did you  
[21] look at?

[22] **A.** Yes. Some tracking spreadsheets dealing  
[23] with our ADA construction activities.

[24] **Q.** Can you describe a little bit more detail  
[25] what that is.

[1] **A.** No, I don't.

[2] **Q.** How did you access it from your office?

[3] **A.** Yeah, my laptop is mapped to the location  
[4] of the server.

[5] **Q.** So you have remote access to the server?

[6] **A.** Yes.

[7] **Q.** Okay. Did you have to have a password or  
[8] anything?

[9] **A.** Well, other than our initial sign on  
[10] password, no.

[11] **Q.** Do you know if that's something that's  
[12] publically accessible?

[13] **A.** No.

[14] **Q.** And I asked the question in a bad way. Is  
[15] that something that's publically accessible?

[16] **A.** Okay. I don't believe so no.

[17] **Q.** You don't believe so?

[18] **A.** No.

[19] **Q.** Other than that spreadsheet, did you  
[20] review any documents?

[21] **A.** Yes, the questions concerning this  
[22] deposition. I reviewed some other information in my  
[23] position dealing with ADA ramps. And I researched  
[24] some aerial photos that I accessed from my laptop.

[25] **Q.** You said you researched some other info

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[1] that you had on ADA ramps, what is that?  
[2] **A.** Yes. I currently manage our Pavement  
[3] Preservation Program, I have done so since 2013. As  
[4] part of that program a component to that is looking at  
[5] ADA compliance issues for projects associated with  
[6] resurfacing activities.

[7] **Q.** And was there some information in there  
[8] that informed what you would be talking about today?

[9] **A.** Yes. It listed the projects that we had  
[10] done since 2013 to date. And it also -- it was the  
[11] primary spreadsheet we used to do our assessments to,  
[12] you know, confirm whether or not there are some ADA  
[13] issues we need to address.

[14] **Q.** And those are in your possession?

[15] **A.** Yes.

[16] **Q.** The aerial photos, what aerial photos did  
[17] you look at?

[18] **A.** Well, I looked at -- I accessed two sites.  
[19] First site I looked at was Google maps and the  
[20] historical maps. They dated back to I believe 2007.  
[21] I was able to look at the intersection from the aerial  
[22] photos. Also looked at Fulton County's GIS maps.  
[23] They actually went back to 2000. So --

[24] **Q.** Okay. So I'm kind of jumping around a  
[25] little bit. When you looked at these maps, did it

[1] **A.** Some additional staff members who had been  
[2] involved originally with completing some of the work,  
[3] the ADA ramp work. And, you know, just asking  
[4] questions about where some of the data was. I believe  
[5] I talked to one of the field engineers who was  
[6] involved in the actual work. The name is  
[7] Geoffrey Stevens.

[8] **Q.** On that particular intersection or --

[9] **A.** No, no. Just the whole data set from the  
[10] research I did on our storage drive. Of those  
[11] intersections where we had ramps -- where we were  
[12] supposed to prepare ramps since 2009.

[13] **Q.** So you talked with him about some other  
[14] ramps that were installed since?

[15] **A.** No. I was just trying to get some  
[16] additional information about those ramps, were they  
[17] completed, you know, how the work progress.

[18] **Q.** So you talked with him about ramps that  
[19] actually were installed?

[20] **A.** Right.

[21] **Q.** So Michael Ayo. Any other specific names  
[22] of people you recall speaking with?

[23] **A.** I believe, yes, Angela Campbell.

[24] **Q.** Who is that?

[25] **A.** She works in our Commission's Office and

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[1] appear that that intersection has been lacking in  
[2] sidewalk ramps all the way going back to 2000?

[3] **A.** There were no sidewalk ramps at that  
[4] intersection dating all the way back to 2000, yes.

[5] **Q.** Did that surprise you at all?

[6] **A.** No.

[7] **Q.** Why doesn't it surprise you?

[8] **A.** Because the area that we're looking at is  
[9] actually an intersection of two bridges. And the  
[10] bridge -- the bridges were built, I believe, they're  
[11] 70-years-old. I consulted a bridge engineer about the  
[12] age of the bridges.

[13] **Q.** Okay. You said you had talked to some  
[14] additional staff, who did you talk to?

[15] **A.** One being Michael Ayo; he's our bridge  
[16] engineer.

[17] **Q.** Spell the last name for me.

[18] **A.** His last name is spelled, A-y-o.

[19] **Q.** Ayo?

[20] **A.** Yeah, Ayo.

[21] **Q.** He's a bridge engineer?

[22] **A.** Yeah, he's the department's primary bridge  
[23] engineer.

[24] **Q.** Okay. Anyone else you spoke with to  
[25] prepare for today other than your attorney?

[1] she researches records for the Commission's Office.

[2] **Q.** And what commissioner are you referring  
[3] to?

[4] **A.** The Department of Public Works  
[5] Commissioner. He's our department head.

[6] **Q.** For City of Atlanta?

[7] **A.** Yes.

[8] **Q.** Anyone else you recall speaking with  
[9] specifically?

[10] **A.** No. I tried to contact additional staff,  
[11] but they were not available.

[12] **Q.** Okay. So as far as anyone who you had any  
[13] kind of substantive conversation with to prepare for  
[14] today that would be Michael Ayo and Angela Campbell?

[15] **A.** Yes.

[16] **Q.** So other than what we've talked about  
[17] already, are there any other records or any other  
[18] individuals who you consulted or reviewed for purposes  
[19] of preparing for your deposition today?

[20] **A.** No.

[21] **Q.** All right. I want to go into some of the  
[22] specific questions in here or topics.

[23] **A.** Sure.

[24] **Q.** The first topic we asked to have testimony  
[25] on is the City's policies and procedures for receiving

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[1] and responding to requests for installation of  
[2] sidewalk curb ramps as contemplated by the 2009  
[3] settlement agreement between the City and the  
[4] Department of Justice.

[5] First question with respect to that: Are  
[6] you in general familiar with what we're referring to  
[7] by the 2009 settlement agreement between the City and  
[8] the Department of Justice?

[9] A. Yes.

[10] Q. And can you describe what that is for the  
[11] record.

[12] A. Well, the 2009 settlement agreement  
[13] identified deficiencies in our ADA ramps, facilities,  
[14] services. And the City was required to do an  
[15] assessment and develop a plan to address those  
[16] deficiencies. There were several components, one  
[17] dealing with facilities like I mentioned earlier,  
[18] services, sidewalks.

[19] Q. Do you have any awareness of how that  
[20] agreement came about? Was there litigation, was there  
[21] something that led to a settlement agreement that you  
[22] know of?

[23] A. I do not know how that agreement came  
[24] about.

[25] Q. Okay. But it's your understanding that

[1] I were to go to the Atlanta.ga website, how would I  
[2] find specifically what you're talking about?

[3] A. It should pop up on a screen on the  
[4] initial page, and you can also access it via the  
[5] Department of Public Works. There's a drop down menu  
[6] and various departments are identified and you should  
[7] be able to access it via one of those drop down menus,  
[8] via department along with some other additional  
[9] things.

[10] Q. Is there any sort of form or grievance  
[11] procedure specifically aimed towards the ADA  
[12] compliance?

[13] A. No.

[14] Q. So what you're talking about is sort of a  
[15] form or a request that would generally apply to  
[16] requests for sidewalks repair?

[17] A. Yes.

[18] Q. Like if the sidewalk in front of my house  
[19] was broken out by branches, there's some kind of form  
[20] I could request a repair to that?

[21] A. Yes, you could request a service request.  
[22] As I mentioned earlier, we consider sidewalk ADA ramps  
[23] an integral component to sidewalk construction. So  
[24] you can ask for an ADA repair via that same problem  
[25] code that tracks those requests.

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[1] the City is bound by that agreement; is that fair to  
[2] say?

[3] A. Yes.

[4] Q. All right. Let me ask you just kind of  
[5] broadly: What are the City's policies and procedures  
[6] for receiving and responding to requests for  
[7] installation of sidewalk curb ramps?

[8] A. Well, primarily the City receives all our  
[9] requests via our customer service 311 system that's  
[10] tied to our work management system heads.

[11] In the work management system requests for  
[12] repairs to sidewalks is inclusive of ADA ramps. ADA  
[13] ramps are considered an integral component of  
[14] repairing sidewalks. So those requests will come to  
[15] the department via our management system.

[16] Q. And if I was a person in a wheelchair that  
[17] wanted a curb ramp to be installed, how would I find  
[18] that 311 system?

[19] A. Well, it's noted on our web page. It's  
[20] accessible on the website.

[21] Q. Okay. I think I have access to the WiFi  
[22] here. What is the web address for that?

[23] A. Atlantaga.gov.

[24] Q. So if I were to go to that website, where  
[25] would I find the -- I can't find it right now. But if

[1] Q. Okay. It's the same form basically?

[2] A. Yes.

[3] Q. The form for the sidewalk is broken up by  
[4] branches, is the same way I would go to say a sidewalk  
[5] doesn't have a ramp --

[6] A. Correct.

[7] Q. -- so I can't get up on it in my  
[8] wheelchair?

[9] A. Correct.

[10] Q. And is there any kind of separate  
[11] grievance procedure for ADA noncompliance with respect  
[12] to sidewalk access?

[13] A. No.

[14] MR. RADFORD: It looks like I'm still not  
[15] able to -- there's a law guest, do you know if  
[16] there's a password for that?

[17] MS. FLOYD: I do not. I'm sorry.

[18] MR. RADFORD: Okay. Can we find out?

[19] MS. FLOYD: Let me see if I can e-mail  
[20] someone about that.

[21] MR. RADFORD: Let's go off the record.  
[22] (Recess from 10:27 a.m. to 10:29 a.m.)

[23] Q. (By Mr. Radford) So for the record, I've  
[24] got pulled up on my laptop here the City of Atlanta  
[25] website, Atlantaga.gov. Have I truly and accurately

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[1] pulled up the City of Atlanta website?  
[2] A. Yes, that's the City of Atlanta website.  
[3] Q. Okay. So how would I find on this website  
[4] what you're talking about, the place to request or  
[5] repair a sidewalk?  
[6] A. Okay. It usually scrolls through --  
[7] Q. What if I look up public works in the  
[8] search bar? Try that?  
[9] A. Well, yeah, you can.  
[10] Q. Let's see if that gets us there. City of  
[11] Atlanta Public Works.  
[12] A. Yeah.  
[13] Q. And you can scroll on your own if you want  
[14] to.  
[15] A. Yeah. Hit the residence.  
[16] Q. Residence.  
[17] A. Let's see what --  
[18] Q. So we've clicked on the tab residence.  
[19] A. I'm just --  
[20] Q. Sure. Go ahead. So you clicked on City  
[21] Hall and then another tab that says online services.  
[22] A. Right. And scroll back up for me. Can  
[23] you go back up in the search and type 311.  
[24] Q. So I'm going up to the search bar and  
[25] typing 311?

[1] problem code. And most street and sidewalk problem  
[2] codes start with ST. And I think the specific code  
[3] for sidewalk is ST-930. And then we've got some other  
[4] ones ST-931 which is larger sidewalk repairs.  
[5] Q. So ST-930 --  
[6] A. Is the primary problem code that's used to  
[7] track those defects or request for services.  
[8] Q. Request for sidewalk repairs?  
[9] A. Uh-huh.  
[10] Q. And then ST-931 would be another code?  
[11] A. Yeah, I believe that one -- that's to  
[12] request for larger sidewalk repairs.  
[13] Q. Okay. Is there any code specifically  
[14] designated for lack of wheelchair access?  
[15] A. No.  
[16] Q. Has there been any efforts to publicize  
[17] this website and this process to people who might need  
[18] wheelchair access to let them know that this is how  
[19] they would go about filing a grievance?  
[20] A. I am not aware of any PSAs or advisories  
[21] specific to those type of requests.  
[22] Q. Okay. And one reason I ask, I mean, kind  
[23] of in my own research, you know as we were working on  
[24] this case, we went on Google and, you know, looking  
[25] for the form that I would use to request, you know, a

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[1] A. Yeah.  
[2] Q. Okay.  
[3] A. Atl311. I don't know why they don't give  
[4] you a --  
[5] Q. Well, let's try the Public Works page  
[6] again. Here's Atl311.com.  
[7] A. Yeah.  
[8] Q. So I'm going to Atl311.com which is a link  
[9] off of the public works page on the Atlanta website.  
[10] A. Okay. It should list several sections you  
[11] can go in. I think one says streets and sidewalks.  
[12] Q. I'll go in the search bar and search for  
[13] sidewalks on the Atl311.com webpage.  
[14] So that's taking a while to load, but as  
[15] we're looking at the main page it looks like a  
[16] specific link that says sidewalk defects?  
[17] A. Right.  
[18] Q. So I'm clicking that. While we're waiting  
[19] for this to load --  
[20] A. Okay.  
[21] Q. -- is there any place where data would be  
[22] compiled as to requests that have come through  
[23] this website?  
[24] A. Yes. There's a way we can pull the data  
[25] out. All requests go in and they're assigned a

[1] sidewalk ramp be repaired or notify the City that  
[2] there's no sidewalk access at a certain intersection  
[3] and there's not anything.  
[4] And I just want to be sure there's not  
[5] something out there that I don't know of. But as far  
[6] as you know that's accurate, there's not been anything  
[7] that's labeled as this is how a person in a wheelchair  
[8] would request a sidewalk ramp be put in at a given  
[9] sidewalk?  
[10] A. That's correct.  
[11] Q. But as an internal matter, you all would  
[12] find out about it if they went through this Atl311  
[13] website?  
[14] A. That's correct.  
[15] Q. Okay. And this could be a problem with my  
[16] phone or it could be a problem with the -- but just  
[17] for the record we've clicked on a link of Atl311 that  
[18] relates to sidewalk repair requests. And it says the  
[19] page isn't working. But, again, that could be just  
[20] because we're having trouble with the connection and  
[21] we can check that out later.  
[22] Okay. And this Atl311 this website and  
[23] this process for requesting sidewalk repairs, how long  
[24] has this process been in place?  
[25] A. The 311 process is a fair ly new step in

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[1] customers being able to access services to the City.  
[2] I think within the last two to three years the 311  
[3] call center or that number, 311, was activated. But  
[4] the work management system that this information feeds  
[5] into has -- we have used that system 10, 15 years. I  
[6] mean --

[7] Q. Okay. So the internal work management  
[8] system has been around for 10 or 15 years, but I guess  
[9] the means for the public to communicate that to the  
[10] City has only been around for two to three years?

[11] A. Well, the specific 311 system. We've had  
[12] other methods. I believe it was previously called  
[13] customer service call center. You know, we've also  
[14] had -- the departments had their internal customer  
[15] service divisions. But with this administration the  
[16] mayor chose to centralize it into a centralized call  
[17] center.

[18] (Plaintiff's [Exhibit 2](#) was marked for  
[19] identification.)

[20] Q. (By Mr. Radford) I'm going to show you  
[21] what I'm going to mark as Plaintiff's [Exhibit 2](#). I'll  
[22] represent to you that this is a copy of the 2009  
[23] settlement agreement that I got from the Department of  
[24] Justice website. Take as much time as you need to  
[25] review it. And let me know if there's something about

[1] accessibility of its sidewalks, including, for  
[2] example, requests to add curb cuts at particular  
[3] locations."

[4] Now from what I understand, at least  
[5] present day, there is no specific written process for  
[6] requests for wheelchair ramps outside of the sort of  
[7] general 311 system for sidewalk repairs, correct?

[8] A. Correct.

[9] Q. And do you know if there ever was any  
[10] written process for soliciting and receiving input  
[11] from persons with disabilities regarding the  
[12] accessibility of sidewalks?

[13] A. I do not.

[14] Q. Have you ever seen any kind of written  
[15] process that would meet that description?

[16] A. I have not.

[17] Q. Let me ask you this question: So through  
[18] the 311 process on the website or from whatever  
[19] existed prior to 311, do you have any record of how  
[20] many requests have come from persons specifically  
[21] complaining that there was not a sidewalk  
[22] accessibility accomodation in a given place within the  
[23] City?

[24] A. Could you repeat that?

[25] Q. Yeah, I made that too complicated. I'm

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[1] it that makes you think it's not an accurate copy.  
[2] And you can see on the very bottom of the page the  
[3] government website it was accessed from.

[4] A. Okay.

[5] Q. And are you familiar with this document?

[6] A. Yes, I am.

[7] Q. And I know it's a long document, but based  
[8] on what you've been able to see from your brief  
[9] review, does it appear to be an accurate copy of the  
[10] 2009 settlement agreement?

[11] A. It does.

[12] Q. And if you'll turn to Page 6, on the  
[13] bottom it says 6/12 on the bottom. You see at the  
[14] very bottom of that page it says sidewalks?

[15] A. Yes.

[16] Q. So the next Page 7 is where the actual  
[17] agreement with relation to sidewalks begins. And  
[18] that's Paragraphs 36 through 40.

[19] A. Uh-huh.

[20] Q. All right. So I want to take a look at  
[21] Paragraph 36 specifically which provides: "Within  
[22] three months of the effective date of this agreement,  
[23] the City will implement and report to the Department  
[24] its written process for soliciting and receiving input  
[25] from persons with disabilities regarding the

[1] going to talk about sidewalk ramps because that's the  
[2] most obvious accessibility accomodation, right?

[3] A. All right.

[4] Q. So either from the new 311 system or  
[5] through whatever proceeded that, do you have any  
[6] record of how many requests have come from people to  
[7] the City of Atlanta for installation of sidewalk  
[8] ramps?

[9] A. No, I don't.

[10] Q. I asked you the question if you had any  
[11] record of that, do you know how many requests have  
[12] come through?

[13] A. No, I do not.

[14] Q. How would we find that out?

[15] A. Through a search of our Hansen work  
[16] management system, specifically the product code  
[17] ST-930. You would have to review those specific  
[18] requests. And then once an inspection is completed,  
[19] the field comments are in there as well as any  
[20] associated work orders that were eventually performed  
[21] as a result of that service request.

[22] Q. Okay. So because there's no specific code  
[23] for wheelchair ramps, you would have to go into sort  
[24] of the subcategory of sidewalk repairs and then search  
[25] within those to see, I guess, just based on the



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[1] comments and things which ones related to wheelchair  
[2] access?  
[3] A. That's correct.  
[4] Q. And have you done that for purposes of  
[5] this deposition today?  
[6] A. I did not.  
[7] Q. Okay. Could you give me a ballpark  
[8] average, how many requests under ST-930 or ST-931 have  
[9] been made since let's say -- you said the system went  
[10] into place about three years ago -- so since that 311  
[11] system went into place, can you give me an estimate as  
[12] to about how many requests you've gotten?  
[13] A. I could give you a better estimate as  
[14] to -- we get these weekly reports about the numbers of  
[15] requests coming in. I know currently we have 140  
[16] active ST-930 requests right now.  
[17] Q. Okay.  
[18] A. Generally that's how many -- we get -- I  
[19] think the last report I reviewed we got 20 requests in  
[20] on one day so --  
[21] Q. Okay. So when you say 140, would those be  
[22] 140 open files so to speak?  
[23] A. Yeah, open unresolved.  
[24] Q. Unresolved. Okay. So 140 pending now --  
[25] A. Right.

[1] A. I don't know the term.  
[2] Q. Hold on one second. When I say it you may  
[3] recognize it. I think it's a term of art.  
[4] A. Okay.  
[5] Q. Well, I can't find the term. Would that  
[6] be something within your domain, I guess, the  
[7] complaints that people are parking and blocking  
[8] sidewalk access?  
[9] A. No. That would probably come via a --  
[10] come through our inspection permits group.  
[11] Q. Code enforcement?  
[12] A. Right, code enforcement.  
[13] Q. From your personal knowledge or based on  
[14] the materials you've reviewed for today, do you have  
[15] any estimate of how many complaints have come through  
[16] that system specifically with respect to the question  
[17] of wheelchair access?  
[18] A. No.  
[19] Q. Do you know if any have come through about  
[20] wheelchair access?  
[21] A. No. I'd have to answer no to that.  
[22] Q. And, no, none have or no you don't know?  
[23] A. I don't know.  
[24] Q. Would it be that type a thing where you  
[25] get the whole data set and you can do control F and

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[1] Q. -- that have yet to be resolved?  
[2] A. Right.  
[3] Q. And then more that have been resolved?  
[4] A. Yes.  
[5] Q. Would you say thousands more?  
[6] A. I would say thousands.  
[7] Q. Would you say tens of thousands?  
[8] A. You said since --  
[9] Q. Since the 311 system went into place.  
[10] A. At least a couple thousand.  
[11] Q. Okay. And this ranges anywhere from -- I  
[12] guess, I gave the example earlier, roots are coming up  
[13] and cracking the sidewalk, would that be included in  
[14] that?  
[15] A. Yes, that would.  
[16] Q. Or maybe the sidewalk is too narrow,  
[17] people complain about that?  
[18] A. Yes.  
[19] Q. Okay. I can't remember the name of it,  
[20] but there's a phrase for when people park their cars  
[21] and they park it too far down on their driveway so  
[22] that they're blocking the sidewalk.  
[23] A. Uh-huh.  
[24] Q. Do you ever hear complaints about that?  
[25] It's called vonent parking or --

[1] find and look for the word wheelchair and find  
[2] complaints that relate to that?  
[3] A. Yes. Let me correct one additional thing.  
[4] I did talk to one additional person about the  
[5] accessing data when I was trying to review a set. And  
[6] that was Pierre Johnson, he's our Director of  
[7] Performance Management. And he indicated to me that  
[8] we can probably download the data and then do a word  
[9] search to identify specific records related to any ADA  
[10] issues. This was late yesterday. So I just recalled  
[11] it.  
[12] Q. Okay. And so prior to the 311 system  
[13] being in place when there was just sort of a customer  
[14] service approach, is there a database or record set  
[15] generated through that process similar to what we have  
[16] with the current 311 system?  
[17] A. Yes. We've had multiple work management  
[18] systems in the department. We've used a file maker  
[19] pro database to track those requests similar -- I  
[20] mean, the data flow -- that data came into Hansen so  
[21] the structure was the same so we could query based on  
[22] problem codes.  
[23] Q. All right. If we go back to [Exhibit 1](#),  
[24] the 30(b)(6) notice. The second topic we've asked the  
[25] City to designate a witness on is the number of and



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[1] the details of all requests for installation of  
[2] sidewalk curb ramps as contemplated by the 2009  
[3] settlement.  
[4] Are you prepared to answer questions about  
[5] that?  
[6] A. So this question is specific to curb  
[7] ramps?  
[8] Q. Yes, sir.  
[9] A. New requests?  
[10] Q. Right.  
[11] A. My answer to that is I don't have the  
[12] number of -- it would require extensive research  
[13] across maybe five different divisions to ascertain all  
[14] the new requests or installations of sidewalk and  
[15] sidewalk curb ramps since the 2009 settlement.  
[16] Q. Okay. When you say you have to look  
[17] across five different divisions --  
[18] A. Yes, sir.  
[19] Q. -- what different divisions would you have  
[20] to --  
[21] A. We have a -- the old Quality of Life Bond  
[22] Program was reprogrammed as a Capital Projects  
[23] Division; so that's one division. They do a number of  
[24] sidewalk projects.  
[25] Q. So you call it Capital Bonds?

[1] position, I can't recall the exact title but there  
[2] were two positions I think.  
[3] Q. I keep saying do you know. Is there an  
[4] ADA coordinator today?  
[5] A. I do believe so. That gentleman's name is  
[6] Billy Warner. He works in our -- he works in our --  
[7] it's the whole General Services Division.  
[8] Q. So Billy Warner.  
[9] A. Yeah. Office of Enterprise Asset  
[10] Management, OEAM.  
[11] Q. Okay. And that's the ADA coordinator?  
[12] A. Right.  
[13] Q. And is that the chief man in the city for  
[14] ADA compliance issues?  
[15] A. His task was to coordinate our reporting  
[16] requirements associated with that settlement agreement  
[17] across all the division, but I think specifically  
[18] since he manages our facilities he was responsible for  
[19] insuring that they were compliant in accordance with  
[20] the agreement.  
[21] Q. Has he had any role with respect to  
[22] sidewalk access?  
[23] A. Not outside the public right of way, I do  
[24] not think so.  
[25] Q. What do you mean by that, not outside the

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[1] A. Capital Projects Division.  
[2] Q. Projects Division. Okay.  
[3] A. They do a number of streetscape projects,  
[4] sidewalk projects, funded via various methods; federal  
[5] funding impact fees. So they should have -- they have  
[6] constructed some new curb ramps and sidewalks.  
[7] We have a new program called Renew  
[8] Atlanta. That's our new bond program. They're  
[9] constructing sidewalks, resurfacing streets, and  
[10] performance streetscape projects along with repairs to  
[11] other vertical infrastructure.  
[12] There's a planning division in the Office  
[13] of Transportation that reviews building permits for,  
[14] you know, construction of sidewalk to ensure that  
[15] they're compliant.  
[16] We have our Operational Street Resurfacing  
[17] Program, Pavement Preservation Program, that I  
[18] specifically manage. And we also have our operational  
[19] internal work crews who could be tasked with doing  
[20] some of these new ramps and sidewalks as well.  
[21] Q. Okay. Does City of Atlanta have an ADA  
[22] director or like an ADA office?  
[23] A. I don't think they have an ADA director.  
[24] There was an ADA -- American Disability Acts  
[25] coordinator I believe. And there was another

[1] public right of way?  
[2] A. The public right of way is the street  
[3] sidewalk basic area. I think Bill's primary  
[4] responsibility is public facilities. You know, so we  
[5] try to keep the distinction between the public right  
[6] of way and private property. In some private property  
[7] cases it happens to be public property.  
[8] Q. Okay. I'm going off the radar for a  
[9] second, but I've heard -- I can't find anything to  
[10] substantiate this, but in my research I've heard  
[11] people say that in City of Atlanta a homeowner is  
[12] responsible for the sidewalk in front of their home.  
[13] And if there's any damage to it they're responsible to  
[14] repair it and not the City.  
[15] A. I can speak to that.  
[16] Q. Tell me, is that true?  
[17] A. Yes and no.  
[18] Q. Okay.  
[19] A. Yes, the City has a code Section 1-38-14,  
[20] which deal specifically with sidewalk maintenance.  
[21] And there's basically five subsections to that  
[22] ordinance. You know, one deals with maintenance --  
[23] removal of snow and ice, typical of people up North,  
[24] routinely they have to shovel snow.  
[25] Q. And Atlanta nowadays.

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[1] A. True. There's also a section that deals  
[2] with maintenance of the grass strip if one is there.  
[3] The homeowner is required to keep the grass cut, keep  
[4] it filled, prune any plants in that area.  
[5] If there is no grass strip the  
[6] Commissioner has the discretion to pave the sidewalk  
[7] all the way to the curb. And then the maintenance is  
[8] actually assigned to the abutting property owner upon  
[9] notice from the department. And once we determine  
[10] that the repairs were not responsible as a result of  
[11] some admissible function or utility company, public  
[12] trees, then that responsibility is assigned to the  
[13] property owner with a caveat. And that caveat, if the  
[14] City has provided funding for the repairs then the  
[15] City will proceed with the repairs on a prioritized  
[16] basis until that funding is exhausted. At that time,  
[17] once the funding is exhausted we revert back to the  
[18] property owner being responsible.  
[19] Q. Okay. So does it sometimes happen that  
[20] someone will complain that the sidewalk in front of  
[21] their house is broken and they'll be told they  
[22] actually have to pay to repair?  
[23] A. Yes, sometimes.  
[24] Q. Is that 50 percent of the time, more than  
[25] 50 percent of the time?

[1] A. Yes.  
[2] Q. And then prior to that, though, there were  
[3] often instances where the property owner would be  
[4] required to do the repairs themselves?  
[5] A. There have been some instances. I believe  
[6] the last time we noticed property owners about the  
[7] responsibility to repair sidewalks was in 2013. But  
[8] prior to that I don't recall.  
[9] Q. Have there been any instances where a  
[10] property owner was told that they had to install their  
[11] own handicapped accessibility?  
[12] A. No, no. If a request for an ADA ramp came  
[13] in the City would install that at no expense to the  
[14] property owner.  
[15] Q. Okay. Topic No. 3 on our 30(b)(6) notice  
[16] was: The City's policies and procedures for  
[17] identifying sidewalks that are not compliant with the  
[18] ADA.  
[19] I think we've already covered this. My  
[20] understanding is that would be done through currently  
[21] the 311 system and previously through the customer  
[22] service system, but there is no specific policy  
[23] directed towards requests for ADA compliance?  
[24] A. That's right.  
[25] Q. And to your knowledge there never has

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[1] A. Here lately zero percent of the time  
[2] because the City has provided funding over the last  
[3] few years to complete sidewalk repairs.  
[4] Q. Okay.  
[5] A. At least over the last two, three years.  
[6] Q. Okay.  
[7] A. So we haven't had to notice property  
[8] owners about their responsibility to make those  
[9] repairs.  
[10] Q. And has there been a grant or some other  
[11] specific funding source that that money has come from?  
[12] A. Well, there was a move by counsel to  
[13] provide funding for infrastructure, public  
[14] infrastructure. I don't recall the exact ordinance,  
[15] but it allocated a percent of the general budget for  
[16] public repairs. That could include sidewalks, it  
[17] could include signals, any public, you know,  
[18] infrastructure that might need repair. And we've been  
[19] fortunate enough to receive a substantial portion of  
[20] that money for sidewalk repairs.  
[21] Q. Okay. So that funded sidewalk repairs, I  
[22] think you said from the last couple of years?  
[23] A. Yes, the last couple of years. At least  
[24] two.  
[25] Q. At least two?

[1] been?  
[2] A. To my knowledge, no.  
[3] Q. No. 4 asks: The City's policies and  
[4] procedures for identifying streets, roads, and  
[5] highways that have been constructed or altered since  
[6] January 26, 1992, for purposes of the ADA compliance.  
[7] Tell me what are the City's policies and  
[8] procedures in that request?  
[9] A. Well, initially as a result of the consent  
[10] decree the department was tasked with identifying all  
[11] streets that had been resurfaced since 1992. They  
[12] completed that assessment and identified, I believe, a  
[13] total of it was roughly about 740 streets that we had  
[14] completed some resurfacing activity from 1992 to  
[15] 2000 -- to the year 2000.  
[16] And then from 2001 to 2009 they identified  
[17] another 793 streets where we needed to assess for ADA  
[18] compliance issues. All total I believe that was like  
[19] 703 miles of roadway, which is about a little less  
[20] than -- a little more than about 44 percent of our  
[21] total network -- roadway network. Excuse me.  
[22] Q. Is there a document or something that I  
[23] could look at and see what streets were identified in  
[24] there?  
[25] A. Yes. The tracking spreadsheet that I

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[1] found will identify all of the actual street locations  
[2] and it has some other analytics. I just printed out  
[3] one copy so I could remember.

[4] Q. And you've got a document you're looking  
[5] at, can you tell me what that document is?

[6] A. Yeah. Well, this is just a summary page  
[7] abstract from that data set. I mean, with that many  
[8] records I just didn't have time to review them all.  
[9] But anyway, there was a summary page in one of the  
[10] work tabs so I pulled that out. And it has some  
[11] summary information about the number of ramps they  
[12] found. The number that the ADA ramps were compliant  
[13] and the number of ramps that were found to be  
[14] compliant and/or missing.

[15] Now, there's some gaps in the data, some  
[16] years some of the fields are not filled. And that's  
[17] one of the reasons I talked to some of the field  
[18] engineers to get a better understanding of why these  
[19] gaps were. There's also a gap between 2010 and --  
[20] between the time 2010 to 2013. I took over the  
[21] Pavement Preservation Program in 2013. But from the  
[22] year 2010 to that date 2013, there was a gap in the  
[23] data.

[24] I hadn't been able to ascertain why that  
[25] data -- I believe the previous management retired and

[1] Q. CODA, C-o-d-a?

[2] A. Yeah, I don't remember what those acronyms  
[3] are, but that is now a defunct agency. And I don't  
[4] know where the records are associated with that. But  
[5] they would have kept all the records associated with  
[6] anything related to the Olympics.

[7] Q. Okay. Were you living in Atlanta around  
[8] the time of the Olympics?

[9] A. Yes, I was.

[10] Q. And in general would you agree that there  
[11] was a massive amount of construction and repair in the  
[12] downtown Atlanta area?

[13] A. Yes, I was involved in quite a bit.

[14] Q. Okay. And they created something called  
[15] Centennial Olympic Park Drive, right?

[16] A. Correct.

[17] Q. Which is one of the roads we're talking  
[18] about in this case?

[19] A. Yes.

[20] Q. And that road was completely redone for  
[21] the Olympics, correct?

[22] A. Certain sections were, yes.

[23] Q. There was no Centennial Olympic Park Drive  
[24] prior to the Olympics, right?

[25] A. It was actually Techwood Drive prior to

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[1] it was assigned to a new person for that time period  
[2] and they may have the data it just didn't get input in  
[3] this spreadsheet.

[4] Q. So you have records of I believe you said  
[5] resurfacing between 19 --

[6] A. '92 through the year 2009.

[7] Q. 2009. But you don't have any data of --

[8] A. From 2010 to 2013.

[9] Q. Okay.

[10] A. And I specifically have the data  
[11] associated from 2013 to date.

[12] Q. Okay. So the only thing we're missing as  
[13] far as you know is 2010 to 2013?

[14] A. Right.

[15] Q. So the data set from '92 to 2009, would  
[16] that include data with respect to resurfacing or new  
[17] roads, new sidewalks, repairs to roads or sidewalks  
[18] that were part of the 1996 Olympic games?

[19] A. Yes. Any roads that we resurfaced during  
[20] that time would have been included in that data set.

[21] Q. Okay. Do you know if there's any separate  
[22] record anywhere as to specific projects that were  
[23] carried out for the '96 Olympic games?

[24] A. I'm aware that the City created this  
[25] entity called CODA which managed those.

[1] that.

[2] Q. Okay. And that road was designed as a  
[3] main thoroughfare to help with the increase in people  
[4] coming into the city for the Olympics, correct?

[5] A. Correct. A lot of improvements were made  
[6] along certain sections of Techwood now Centennial  
[7] Olympic Park Drive, yes.

[8] Q. And given that, does it surprise you that  
[9] for that whole time that intersection, the  
[10] intersection with Centennial Olympic and MLK, that  
[11] there was never any sidewalk ramps installed there as  
[12] part of that work?

[13] A. No. As I mentioned earlier, Centennial  
[14] Olympic Park Drive when you cross Marietta Street, you  
[15] begin to ascend on a bridge and that bridge is  
[16] approximately 70-years-old. And when you get up to  
[17] the intersection of ML King and Centennial Olympic  
[18] Park that's the intersection of two bridges. So all  
[19] of that is aerial. And below that is what I think  
[20] they referred to as the gulch.

[21] Q. Okay. But what about that would make it  
[22] not surprising to you that that intersection wouldn't  
[23] have been made handicapped accessible as part of the  
[24] Olympic's construction?

[25] A. I don't believe that we had any activities

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[1] going that far south. And is that west of the city?  
[2] **Q.** That's right where they're building the  
[3] new dome or tearing down the old one.  
[4] **A.** Yeah, tearing down the old, building the  
[5] new one.  
[6] **Q.** So, I mean, that's a major thoroughfare;  
[7] would you agree?  
[8] **A.** I would agree.  
[9] **Q.** That was a major thoroughfare during the  
[10] Olympic games, right?  
[11] **A.** I would agree.  
[12] **Q.** The intersection we're talking about if  
[13] I'm at that intersection, I'm looking at the new  
[14] stadium, correct?  
[15] **A.** Correct. If you look, I believe, north I  
[16] think that intersection is on a skew, but if you look  
[17] new north you would be looking at the new stadium.  
[18] **Q.** Right. Okay. And before the new stadium  
[19] went in, what would I be looking at?  
[20] **A.** The Georgia Dome.  
[21] **Q.** The Georgia Dome. Okay. And that was  
[22] used in the Olympics, right?  
[23] **A.** I can't -- I don't know. I can't say it  
[24] was or not.  
[25] **Q.** It's been used for Falcons football --

[1] have on the record.  
[2] **A.** The sheet describes abstract data  
[3] associated with street resurfaces in 1992 up to 2009.  
[4] **Q.** Okay. And I'm looking at column E and it  
[5] says number of ADA ramps?  
[6] **A.** Right.  
[7] **Q.** What would that column be showing us?  
[8] **A.** In 1992 based on the streets that were  
[9] assessed they inventoried 547 ramps.  
[10] **Q.** Okay. And the next ADA ramp, would that  
[11] be compliant?  
[12] **A.** That would be compliant.  
[13] **Q.** Okay. So out of that 547 in '92, they  
[14] determined 101 of them were ADA compliant?  
[15] **A.** Correct.  
[16] **Q.** And then the next column G, they  
[17] determined 266 were not compliant?  
[18] **A.** That's correct.  
[19] **Q.** And then column H, they determined 192  
[20] there was no ramp at all in the place where it should  
[21] be?  
[22] **A.** Correct.  
[23] **Q.** And that data is also complied with  
[24] respect to '93, '94, '95, and '96?  
[25] **A.** Right.

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[1] **A.** Absolutely.  
[2] **Q.** -- for quite some time?  
[3] **A.** Yes.  
[4] **Q.** Does the City have a practice of, I guess,  
[5] regularly inspecting major intersections to make sure  
[6] they're compliant with the ADA?  
[7] **A.** There's no proactive program to inspect  
[8] sidewalks or ADA -- intersections for ADA compliance.  
[9] **MR. RADFORD:** Let me stop for just a  
[10] second, can we make a copy of this?  
[11] **MS. FLOYD:** Yes.  
[12] **MR. RADFORD:** I want to make a copy and  
[13] put it in the record as an exhibit.  
[14] **MS. FLOYD:** Okay. Do you want to take a  
[15] break now so I can do that?  
[16] **MR. RADFORD:** Yeah, why don't we.  
[17] (Recess from 11:10 a.m. to 11:14 a.m.)  
[18] (Plaintiff's [Exhibit 3](#) was marked for  
[19] identification.)  
[20] **Q.** (By Mr. Radford) I'm handing you what I'm  
[21] now marking as [Exhibit 3](#).  
[22] **A.** Correct.  
[23] **Q.** And I believe this is a document you  
[24] previously identified as a summary data sheet  
[25] regarding -- describe it to me, I know you already

[1] **Q.** Do you know where the ramps were  
[2] noncompliant or the ramps were missing? Do you know  
[3] for a fact whether they were repaired or installed?  
[4] **A.** In looking at the data set -- the data  
[5] that this abstract came from it indicates that those  
[6] ramps were completed.  
[7] **Q.** Now, from 1997 to 2007 there's no data in  
[8] the columns to show us the number of ramps, the number  
[9] that are incompliant, and the number not compliant,  
[10] et cetera; do you know why that is?  
[11] **A.** I don't at this time. I haven't had time  
[12] to research that. The people I tried to contact were  
[13] either off or out of the country.  
[14] **Q.** So would someone different be in custody  
[15] of the data that relates to '92 through '96 than the  
[16] data that relates to '97 through 2007?  
[17] **A.** There could have been multiple people  
[18] responsible for various years. I haven't been able to  
[19] ascertain who those people are, you know, as of this  
[20] date.  
[21] **Q.** And, again, I think you said there's a gap  
[22] in the data between 2010 and 2013?  
[23] **A.** Correct.  
[24] **Q.** But you are in possession of the data from  
[25] 2013 to present day?

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[1] A. Correct.  
[2] Q. But neither of those sets are included  
[3] in --  
[4] A. Correct.  
[5] Q. -- what we're looking at as Plaintiff's  
[6] [Exhibit 3](#), correct?  
[7] A. Correct.  
[8] Q. If we look back to the notice, topic five  
[9] we asked for: The identification of all installation  
[10] of new sidewalk ramps in order to comply with the 2009  
[11] settlement.  
[12] Other than what we have here in  
[13] Plaintiff's [Exhibit 3](#), can you speak on how many new  
[14] sidewalk ramps have been installed to comply with the  
[15] 2009 settlement?  
[16] A. Not specifically. I'd have to refer back  
[17] to my answer to question two, those five different  
[18] divisions I'd have to review the data that they have  
[19] to get a -- the data set that identifies, you know,  
[20] all those new sidewalk ramps.  
[21] Q. Okay. So is it a fair statement that  
[22] you're not able to offer complete answers to some of  
[23] the questions that we've posed because there are  
[24] sources of that information you haven't had an  
[25] opportunity to consult yet?

[1] then we've got to do an extensive evaluation of the  
[2] structure to determine how it was constructed and what  
[3] we can do to retrofit that intersection for ADA ramps.  
[4] Q. And I imagine just as a matter of business  
[5] or whatever, given that that intersection is going to  
[6] be part of the access to the new stadium, the City  
[7] would want that to be ADA compliant; would you agree?  
[8] A. I would agree. I believe I recall the  
[9] conversation with our bridge engineer, Michael Ayo,  
[10] and I do believe that bridge is slated to be replaced.  
[11] So the actual date I'd have to defer to him.  
[12] Q. Right.  
[13] A. But we are looking at plans to replace  
[14] that bridge. We're currently working on the Spring  
[15] Street bridge. We had to do that bridge in two  
[16] phases. So all of those bridges are up, you can't  
[17] take multiple bridges out at the same time without  
[18] creating a mess. So they've, you know, staggered how  
[19] they handle that. So they're beginning work on the  
[20] Spring Street bridge and I think after that they'll  
[21] move on around the corner to Marietta bridge and then  
[22] the Centennial Olympic Park bridge.  
[23] Q. And just to be clear, I think I've got on  
[24] my computer here an image, would you agree this is an  
[25] image of the intersection we're talking about --

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[1] A. Correct.  
[2] Q. Okay. And then finally No. 6: We asked  
[3] that you speak on the City's position regarding why  
[4] sidewalk ramps have not to date been installed at the  
[5] intersection of Martin Luther King Boulevard and  
[6] Centennial Olympic Park Drive.  
[7] I think we discussed earlier that this was  
[8] an old bridge, do you have something beyond that to  
[9] say with respect to why sidewalk ramps have not been  
[10] installed at that intersection?  
[11] A. In addition to, I also talked to our  
[12] bridge engineer. One of the challenges with trying to  
[13] make repairs on a structure that's seven-years-old is  
[14] trying to find the documents, the plans of the bridge.  
[15] And we have -- he has been trying to research old  
[16] records. We have several offsite locations that he's  
[17] been reviewing.  
[18] So the challenge is, you know, we don't  
[19] quite know how the sidewalks are either constructed.  
[20] We don't know if they're on the bridge deck proper or  
[21] if they're attached via some lever system. So if  
[22] they're attached and you go to retrofitting them the  
[23] whole sidewalk may fall.  
[24] So those are some of the challenges. So  
[25] securing the plans and if we can't find those plans

[1] A. Yes, I would.  
[2] Q. -- from a Google street view? And, again,  
[3] we're looking at the intersection of Martin Luther  
[4] King, Jr. and Centennial Olympic Park Drive, and the  
[5] islands, the concrete islands, and then the sidewalks  
[6] on the other side of the concrete islands, those are  
[7] what is lacking in the ramps, correct?  
[8] A. Correct.  
[9] Q. Are these islands themselves on the  
[10] bridge?  
[11] A. That's one item we haven't been able to  
[12] determine if they were installed on the deck proper or  
[13] poured -- what we call a monolithic pour at the same  
[14] time. So without the plans we don't know specifically  
[15] without doing some more exploratory work.  
[16] Q. Okay. Is it safe to say that at present  
[17] day there is no specific plan in place to install  
[18] sidewalk ramps at this intersection?  
[19] A. No. Michael Ayo is actively investigating  
[20] options to put ramps at that location. He's consulted  
[21] contractors to come up with some ways we can do it. I  
[22] think he's pursuing a design build option if we can do  
[23] it that way. But the crux to all of this is that  
[24] there's a major concern with the age of this bridge  
[25] and doing work on it without some idea of how it's

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[1] constructed.  
[2] **Q.** Okay. I guess these efforts to really get  
[3] serious about finding out ways to make this ADA  
[4] compliance has resulted from this lawsuit?  
[5] **A.** I can't -- I don't know if they resulted  
[6] from this lawsuit.  
[7] **Q.** Okay. Prior to this lawsuit, were you  
[8] aware of any specific discussions about making this  
[9] intersection ADA compliant?  
[10] **A.** No, I am not.  
[11] **Q.** So discussions you've had about it have  
[12] been in the context of this lawsuit, correct?  
[13] **A.** Correct.  
[14] **Q.** And part of the reason why they're wanting  
[15] to fix this is to resolve this lawsuit, correct?  
[16] **A.** I would think they would want to fix it to  
[17] make it ADA compliant. There, again, I'd defer to  
[18] Michael, but I do believe there's plans to replace it.  
[19] And as part of those replacement plans they will  
[20] reconstruct the bridge so that it is.  
[21] **Q.** And the plans to reconstruct the bridge  
[22] that is not just to make this ADA compliant, is it?  
[23] **A.** Any time we rebuild bridges or install new  
[24] sidewalks it's an integral component, ADA compliance  
[25] is always an integral component of those construction

[1] when I'll have an update, as soon as I do I'll be  
[2] in contact with you.  
[3] **MR. RADFORD:** Okay. And obviously all the  
[4] records we discussed today we want copies of  
[5] that.  
[6] **MS. FLOYD:** Yes.  
[7] **MR. RADFORD:** All right. Well, sir, I  
[8] appreciate your time today. And for now that's  
[9] it and we'll probably reconvene at some point,  
[10] but I think for today that's good.  
[11] **MS. FLOYD:** Okay. And we'll read and  
[12] sign.  
[13] (Deposition concluded at 11:26 a.m.)  
[14] (Pursuant to Rule 30(e) of the Federal  
[15] Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e),  
[16] signature of the witness has been reserved.)  
[17]  
[18]  
[19]  
[20]  
[21]  
[22]  
[23]  
[24]  
[25]

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[1] activities.  
[2] **Q.** I understand. There's other reasons they  
[3] want to rebuild the bridge just beyond the ADA issue  
[4] at this intersection, correct?  
[5] **A.** Yes.  
[6] **Q.** That would seem like a pretty expensive  
[7] way to deal with the problem?  
[8] **A.** Yes.  
[9] **MR. RADFORD:** Okay. I guess one thing I  
[10] want to say on the record is it sounds like  
[11] there's some information he wasn't able to get to  
[12] fully answer the questions, right?  
[13] So I do want to leave this open so once  
[14] some time has passed I would ask you to continue  
[15] to please try to gather the information.  
[16] **MS. FLOYD:** Okay.  
[17] **MR. RADFORD:** We want to reserve the right  
[18] to reopen it, come back and get full information.  
[19] **MS. FLOYD:** Yeah, we agree to that.  
[20] That's fine.  
[21] **MR. RADFORD:** Do we have any kind of  
[22] timeline as to when we're going to get discovery  
[23] responses from you guys.  
[24] **MS. FLOYD:** We are working on that. I'm  
[25] working diligently to get that. I do not know

[1] CERTIFICATE OF COURT REPORTER  
[2]  
[3] STATE OF GEORGIA:  
[4] COUNTY OF FULTON:  
[5]  
[6] I hereby certify that the foregoing  
[7] transcript was reported as stated in the caption and  
[8] the questions and answers thereto were reduced to  
[9] writing by me; that the foregoing 51 pages represent a  
[10] true, correct, and complete transcript of the evidence  
[11] given on Thursday, November 17, 2016, by the witness,  
[12] Lawrence Jeter, who was first duly sworn by me.  
[13] I certify that I am not disqualified  
[14] for a relationship of interest under  
[15] O.C.G.A. 9-11-28(c); I am a Georgia Certified Court  
[16] Reporter here as an independent contractor of  
[17] JPA Reporting, LLC who was contacted by  
[18] James E. Radford, Esq., to provide court reporting  
[19] services for the proceedings; I will not be taking  
[20] these proceedings under any contract that is  
[21] prohibited by O.C.G.A. 15-14-37(a) and (b) or  
[22] Article 7.C. of the Rules and Regulations of the  
[23] Board; and by the attached disclosure form I confirm  
[24] that neither I nor JPA Reporting, LLC are a party to a  
[25] contract prohibited by O.C.G.A. 15-14-37(a) and (b) or  
[26] Article 7.C. of the Rules and Regulations of the  
[27] Board.  
[28] This 1st Day of December, 2016.  
[29]  
[30]  
[31] JENNIFER GOODRICH  
[32] CERTIFIED COURT REPORTER  
[33] GEORGIA CERTIFICATE  
[34] NO. 5084-0657-3249-3312  
[35]

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[1] DISCLOSURE OF NO CONTRACT

[2]

[3] I, Lynn Pyles, do hereby disclose pursuant

[4] to Article 10.B of the Rules and Regulations of the

[5] Board of Court Reporting of the Judicial Council of

[6] Georgia that JPA Reporting, LLC was contacted by the

[7] party taking the proceedings to provide court

[8] reporting services for these proceedings and there is

[9] no contract that is prohibited by O.C.G.A. 15-14-37(a)

[10] and (b) or Article 7.C. of the Rules and Regulations

[11] of the Board for the taking of these proceedings.

[12]

[13] There is no contract to provide reporting

[14] services between JPA Reporting, LLC or any person with

[15] whom JPA Reporting, LLC has a principal and agency

[16] relationship nor any attorney at law in this action,

[17] party to this action, party having a financial interest

[18] in this action, or agent for an attorney at law in

[19] this action, party to this action, or party having a

[20] financial interest in this action. Any and all

[21] financial arrangements beyond our usual and customary

[22] rates have been disclosed and offered to all parties.

[23]

[24] This 1st Day of December, 2016.

[25]

[16] LYNN PYLES, FIRM REPRESENTATIVE

[17] JPA REPORTING, LLC

[1] DEPOSITION OF: LAWRENCE JETER /JPG

[2] Page No. Line No. should read:

[3] Reason for change:

[4] Page No. Line No. should read:

[5] Reason for change:

[6] Page No. Line No. should read:

[7] Reason for change:

[8] Page No. Line No. should read:

[9] Reason for change:

[10] Page No. Line No. should read:

[11] Reason for change:

[12]

[13] If supplemental or additional pages are necessary,

[14] please furnish same in typewriting annexed to this

[15] deposition.

[16]

[16] LAWRENCE JETER

[17] Sworn to and subscribed before me,

[18] This the day of , 20 .

[19] Notary Public

[20] My commission expires:

[21]

[22] Please forward corrections to:

[23] JPA Reporting, LLC

[24] 1776 Peachtree Street, N.W., Suite 390-N

[25] Atlanta, Georgia 30309

404-853-1811

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[1] DEPOSITION OF: LAWRENCE JETER /JPG

[2] I do hereby certify that I have read all

[3] questions propounded to me and all answers given by me

[4] on November 17, 2016, taken before Jennifer Goodrich,

[5] and that:

[6] 1) There are no changes noted.

[7] 2) The following changes are noted:

[8]

[9] Pursuant to Rule 30(e) of the Federal Rules of

[10] Civil Procedure and/or the Official Code of Georgia

[11] Annotated 9-11-30(e), both of which read in part: Any

[12] changes in form or substance which you desire to make

[13] shall be entered upon the deposition...with a

[14] statement of the reasons given...for making them.

[15] Accordingly, to assist you in effecting corrections,

[16] please use the form below:

[17]

[18] Page No. Line No. should read:

[19] Reason for change:

[20]

[21] Page No. Line No. should read:

[22] Reason for change:

[23]

[24] Page No. Line No. should read:

[25] Reason for change:

[26]

[27] Page No. Line No. should read:

[28] Reason for change:

[29]

[30] Page No. Line No. should read:

[31] Reason for change:

[32]

[33] Page No. Line No. should read:

[34] Reason for change:

[35]



<p><b>A</b></p> <p><b>able (10)</b> 9:21;15:7;16:15; 21:1;22:8;37:24;44:18; 45:22;48:11;50:11</p> <p><b>Absolutely (1)</b> 42:1</p> <p><b>abstract (3)</b> 37:7;43:2;44:5</p> <p><b>abutting (1)</b> 33:8</p> <p><b>access (17)</b> 7:14;8:2,5;14:21; 15:4,7;16:12;19:14,18;20:2; 21:1;25:2;27:8,17,20;31:22; 47:6</p> <p><b>accessed (4)</b> 7:23;8:24;9:18; 22:3</p> <p><b>accessibility (5)</b> 23:1,12,22; 24:2;35:11</p> <p><b>accessible (5)</b> 7:20;8:12,15; 14:20;40:23</p> <p><b>accessing (1)</b> 28:5</p> <p><b>accomodation (2)</b> 23:22;24:2</p> <p><b>accordance (1)</b> 31:19</p> <p><b>accurate (3)</b> 20:6;22:1,9</p> <p><b>accurately (1)</b> 16:25</p> <p><b>acronyms (1)</b> 39:2</p> <p><b>across (3)</b> 29:13,17;31:17</p> <p><b>activated (1)</b> 21:3</p> <p><b>active (1)</b> 25:16</p> <p><b>actively (1)</b> 48:19</p> <p><b>activities (4)</b> 6:23;9:6;40:25; 50:1</p> <p><b>activity (1)</b> 36:14</p> <p><b>Acts (1)</b> 30:24</p> <p><b>actual (4)</b> 11:6;22:16;37:1; 47:11</p> <p><b>actually (8)</b> 7:21,24;9:23; 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