

**THE CITY OF OKLAHOMA CITY
OFFICE OF
THE MUNICIPAL COUNSELOR**

Council Agenda
Item No. XI. Z Z.1
12/31/2024

TO: Mayor and City Council

FROM: Kenneth Jordan, Municipal Counselor

1. Resolution authorizing the Municipal Counselor to confess judgment without an admission of liability in the case of *Cameo Holland, an Individual and Next of Kin to Minor Child, Stavian Rodriquez, Deceased, v. City of Oklahoma City, Corey Adams, Jared Barton, Brad Pemberton, Bethany Sears, John Skuta, Individually*, in the United States District Court for the Western District of Oklahoma, Case No. CIV-2021-275-J;

AND/OR

2. Enter into executive session on advice of the Municipal Counselor to receive confidential communications from its attorney regarding the above case as authorized by 25 O.S. (2024 Supp.) §307(B)(4), because disclosure would seriously impair the ability of the public body to process the claim or conduct a pending investigation, litigation, or proceeding in the public interest.

On March 30, 2021, Plaintiff filed a lawsuit in the United States District Court of the Western District of Oklahoma against The City of Oklahoma City and individual defendants, Oklahoma City Police Department officers Corey Adams, Jared Barton, Brad Pemberton, Bethany Sears, and Jonathan Skuta. The Plaintiff, Cameo Holland, is the mother of deceased minor child, Stavian Rodriquez. This case arises from allegations related to an officer involved shooting on December 14, 2020, at 7917 South Western Avenue, which resulted in the death of Stavian Rodriquez. Plaintiffs allege the Defendant officers were City employees and are liable under a theory of excessive force pursuant to 42 U.S.C. §1983. Allegations against the City include §1983 municipal liability, specifically deliberate indifference and failure to properly train and supervise its employees. The Plaintiff also alleges a state negligence cause of action against the City.

Defendant Officers are respectively represented by the firms Collins, Zorn, and Wagner, PLLC, Wood, Puhl and Wood, PLLC, and Gary J. James and Associates, PC. The City is represented by Assistant Municipal Counselors Katie Goff, Jeramy Jarman, and Richard Mann.

After engaging in informal settlement negotiations, Counsel for the City has agreed to recommend settlement of this matter to City Council for \$875,000. Plaintiff, through counsel, agreed to accept this amount as full and final settlement of all aspects of this lawsuit, and formally dismiss the individual officers from this matter.

It is the recommendation of this office that Council approve the settlement. If Council agrees, a Resolution authorizing the Municipal Counselor to prepare, execute, and file the necessary paperwork is attached. If Council desires more information regarding the merits of this case, it is the recommendation of this office that the Council enter into executive session with the Municipal Counselor.