

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

Karen Davidson, :
Debbie Flitman, :
Eugene Perry, :
Sylvia Weber, and :
American Civil Liberties :
Union of Rhode Island :

VS.

:C.A. NO: 1:14-cv-00091-1-LDA

City of Cranston, :
Rhode Island :

DEPOSITION OF DEBBIE FLITMAN, a Plaintiff in
the above-entitled cause, taken on behalf of the
Defendant, before Elizabeth Greeley, Notary Public, in
and for the State of Rhode Island, at the offices of
Partridge Snow and Hahn, LLP, 40 Westminster Street,
Providence, Rhode Island, on January 30, 2015 at
10:00 a.m.

PRESENT:

FOR THE PLAINTIFFS.....DEMOS

BY: ADAM LIOZ, ESQUIRE

-AND-

BY: BRENDA WRIGHT, ESQUIRE

FOR THE DEFENDANT.....PARTRIDGE SNOW & HAHN, LLP

BY: DAVID PELLEGRINO, ESQUIRE

Debbie Flitman - January 30, 2015

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1 a way that it makes more sense, because if you answer
2 a question we're going to assume you understood the
3 question. Is that okay?

4 A. Yes.

5 Q. I'm going to try to make sure that once I'm done
6 with the question I allow you to fully answer the
7 question. I won't speak over you. I ask that you do
8 the same, so we have a clear record.

9 If you need a break at any time, I'm more than
10 happy to oblige you and give you that break. I would
11 ask that if I ask a question that you answer the
12 question before we take the break. Is that okay?

13 A. Yes.

14 Q. What is your date of birth, please?

15 A. [REDACTED] 1960.

16 Q. Where do you live?

17 A. Cranston, Rhode Island.

18 Q. Where in Cranston?

19 A. [REDACTED] Cranston.

20 Q. What city or ward is that?

21 A. Four.

22 Q. Do you know who your councilman is?

23 A. Yes.

24 Q. Who is that?

25 A. Aceto, A-C-E-T-O.

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1 at your house?

2 A. Yes, I do.

3 Q. Do you vote?

4 A. Yes.

5 Q. Do you vote regularly?

6 A. Yes, I do.

7 Q. Primaries and general elections?

8 A. Yes, I do.

9 Q. Did you vote in the last primary and general
10 election?

11 A. Yes, I did.

12 Q. Since 2007 have you, since you moved to your
13 address in 2007, have you been, other than for short
14 vacations, have you been living in Cranston that
15 entire time?

16 A. Yes.

17 Q. Have you ever reached out to your school
18 committee member regarding school committee business?

19 A. Yes.

20 Q. When?

21 A. In the past seven years. I can't tell you
22 exactly which years.

23 Q. Have you reached out to them in the last year?

24 A. In the last 12 months, no.

25 Q. In the last 18 months, or, you know, 2 years?