

QUESTIONSFor Petr:

1. Did you object to the jury instruction regarding the inference to be drawn from a single incident of misconduct at trial?
2. Where in the record is there support for the CA10's statement that Officer Rotramel admitted that he had acted in violation of the City's policy regarding the use of force?
3. Who decided how much time to devote to a particular subject in the training program? Do you dispute that his (or her) decisions represent the policy decisions of the City regarding how the officers are to be trained?

For Resp:

1. What proof did you introduce at trial to establish who made the decisions regarding the training curriculum? Is it your position that such decisions constitute City policy?
2. What proof was introduced at trial indicating that the City's policy-makers knew or should have known that the training program was so inadequate that officers were likely to commit constitutional violations?
3. How is the City's failure to train and supervise its officers different from the failure to prevent constitutional violations that was at issue in Rizzo v. Goode?