

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. _____

MICHAELLA LYNN SURAT,

Plaintiff,

v.

RANDALL KLAMSER, in his individual capacity, and
CITY OF FORT COLLINS, a municipality,

Defendants.

DECLARATION OF MICHAELLA SURAT

I, Michaella Surat, declare under penalty of perjury under the law of Colorado that the following is true and correct to the best of my knowledge and information:

1. My name is Michaella Surat. I am over the age of twenty-one and am otherwise competent to testify. I make the following statements based upon my personal knowledge.

2. On March 26, 2019, attorneys at KILLMER, LANE & NEWMAN, LLP, filed a Complaint and Jury Demand in the U.S. District Court for the District of Colorado as my counsel for my claim of Fourth Amendment Excessive Force against Officer Randall Klamser and the City of Fort Collins.

3. The subject of the lawsuit pertains to an incident that occurred on April 6, 2017. Officer Klamser slammed me face-first to the ground outside of a bar in front of a crowd of people where I was there celebrating my twenty-second birthday. The experience was extremely painful, degrading, humiliating, and traumatizing.

4. On March 12, 2020, I am being deposed in this matter for a full day.

5. I have requested that my parents be allowed to attend my deposition for emotional support.

6. I have a close relationship with my parents and they have been my backbone, encouragement, and source of validation throughout my entire criminal case and my ongoing civil case.

7. My parents' attendance is really important to me because my experience with Officer Klamser and his use of force continues to cause me severe emotional distress. As I will be forced to recount my experience of pain and trauma, the presence of my parents will provide me with comfort, strength, and reassurance during a stressful and emotional all-day deposition.

I, Michaella Surat, declare under the penalty of perjury under the law of Colorado that the foregoing is true and correct.

Respectfully submitted on this 9th day of March, 2020.

/s Michaella Surat
Michaella Surat