

ORIGINAL

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La Jolla, CA 92037
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FILED
Clerk of the Superior Court

DEC - 6 2019

By: R. Cersosimo, Clerk

Attorneys for Defendant DAVID ARAMBULA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO – HALL OF JUSTICE

CHRISTOPHER WILLIAMS,

Plaintiff,

v.

DAVID ARAMBULA; CITY OF LEMON GROVE; and DOES 1 through 1,000,

Defendants.

Case No. 37-2018-00023369-CU-PO-CTL
[Complaint Filed: May 11, 2018]

Judge: Hon. Richard S. Whitney
Dept: C-68

DEFENDANTS' MOTION IN LIMINE TO PRECLUDE PLAINTIFF FROM PRESENTING PHOTOGRAPHIC AND DEMONSTRATIVE EVIDENCE DEPICTING PLAINTIFF'S INJURIES; DECLARATION OF EMILY M. STRAUB

[Defense MIL No. 6 of 22]

Trial Date: December 13, 2019

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendant David Arambula hereby moves the Court, on behalf of the defense, for an order precluding Plaintiff Christopher Williams and his counsel of record from presenting photographic evidence depicting plaintiff's injuries, as well as demonstrative evidence utilizing those photographs.

This motion is based on the supporting memorandum of points and authorities, the declaration of Emily M. Straub, the pleadings and papers on file in this action, and upon such argument and evidence as may be presented prior to or at the hearing of this matter.

FAXED

DEC 6 '19 PM 3:36

1 **I. INTRODUCTION**

2 It is anticipated plaintiff and his counsel of record will attempt to the present the jury with
3 photographic and other demonstrative evidence depicting plaintiff's physical condition shortly after
4 the altercation at issue in the lawsuit. The photographs are misleading because they do not depict a
5 permanent or ongoing physical condition. Furthermore, the minimal probative value of the
6 photographs is largely outweighed by the risk of prejudice to the defendants. Good cause therefore
7 exists to preclude plaintiff and his counsel from presenting the jury with these photographs and any
8 demonstrative evidence utilizing the photographs.

9 **II. AUTHORITY FOR MOTION**

10 A motion *in limine* is the appropriate method "to preclude the presentation of evidence
11 deemed inadmissible and prejudicial by the moving party." (*Blanks v. Seyfarth Shaw, LLP* (2009)
12 171 Cal.App.4th 336, 375.) The important purpose served by such motion is "to avoid the
13 obviously futile attempt to "unring the bell" in the event a motion to strike is granted in the
14 proceedings before the jury." (*Hyatt v. Sierra Boat Co.* (1978) 79 Cal.App.3d 325, 337.)

15 **III. THE PHOTOGRAPHS AT ISSUE**

16 There are various bloody photographs of plaintiff's face and arms attached to the
17 Complaint on file in this lawsuit. (*See* Exhibit A to Complaint attached as Exhibit 1 to Declaration
18 of Emily M. Straub ("Straub Decl.")). Plaintiff and his partner, Kathleen McClean, produced
19 various photographs during discovery, which Ms. McClean reportedly took hours after the subject
20 physical altercation. (*See* Exhibits 2 and 3 attached to the Straub Decl.) The City of Lemon Grove
21 Sheriff's Department also produced photographs of plaintiff's face and arms, which were taken at
22 the emergency room hours after the physical altercation. (*See* Exhibit 4 attached to Straub Decl.)

23 **IV. THE COURT SHOULD EXCLUDE THE EVIDENCE UNDER EVIDENCE**

24 **CODE SECTION 352**

25 Pursuant to Evidence Code Section 352, the trial court has broad discretion to "exclude
26 evidence if its probative value is substantially outweighed by the probability that its admission
27 will (a) necessitate undue consumption of time or (b) create substantial danger of undue prejudice,
28 of confusing the issues, or of misleading the jury." (*People v. Holford* (2012) 203 Cal.App.4th

1 155, 167.) Evidence Code section 352 is designed to avoid evidence that “uniquely tends to evoke
2 an emotional bias against [a party] . . . and which has very little effect on the issues.” (*People v.*
3 *Karis* (1988) 46 Cal.3d 612, 638.) CACI 5000 instructs jurors: “You must not let bias, sympathy,
4 prejudice, or public opinion influence your decision.”

5 Here, plaintiff does not need the subject photographs to explain the physical altercation or
6 his injury symptoms. The only purposes for presenting demonstrative and other photographic
7 evidence of plaintiff’s injuries to jurors would be to improperly (a) inflame them, and/or (b) invoke
8 sympathy for plaintiff. Such result would unduly prejudice the defense and otherwise mislead the
9 jury. For these reasons, the jury should not be exposed to photographs or demonstrative evidence
10 depicting plaintiff’s injuries.

11 **V. CONCLUSION**

12 For all of the foregoing reasons, Mr. Arambula respectfully requests the Court grant this
13 motion and issue and order precluding plaintiff and his counsel from presenting photographs of
14 plaintiff’s injuries and demonstrative evidence utilizing those photographs.

15 Dated: December 5, 2019

TYSON & MENDES

16
17
18 By: _____

Jessica G. Heppenstall, Esq.
Emily M. Straub, Esq.

Attorneys for Defendant DAVID ARAMBULA

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DECLARATION OF EMILY M. STRAUB

I, Emily M. Straub, Esq., declare as follows:

1. I am an attorney at law duly licensed to practice in all courts of the State of California.

2. I am a counsel of record for Defendant David Arambula, and offer this declaration in support of the corresponding motion *in limine*.

3. The following facts are based on my own personal knowledge, and if called upon I could and would testify competently thereto.

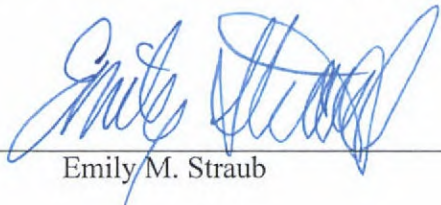
4. Attached hereto as Exhibit 1 is a true and correct copy of plaintiff's Complaint, which attaches various photographs of plaintiff.

5. Attached hereto as Exhibit 2 is a true and correct copy of photographs of plaintiff produced by plaintiff in response to written discovery.

6. Attached hereto as Exhibit 3 is a true and correct copy of photographs produced by Kathleen McClean, both during and subsequent to her deposition.

7. Attached hereto as Exhibit 4 is a true and correct copy of photographs produced by the City of Lemon Grove Sheriff's Department in response to a business record subpoena.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct and that this declaration was executed this 5th day of December, 2019, at La Jolla, California.



Emily M. Straub

EXHIBIT 1

1 BRIGGS LAW CORPORATION [FILE: 1939.00]
Cory J. Briggs (State Bar no. 176284)
2 Anthony N. Kim (State Bar no. 283353)
99 East "C" Street, Suite 111
3 Upland, CA 91786
Telephone: 909-949-7115

4 Attorneys for Plaintiff Christopher Williams
5
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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

05/11/2018 at 04:30:34 PM

Clerk of the Superior Court
By Laura Melles, Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN DIEGO – HALL OF JUSTICE
10

11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 vs.

14 DAVID ARAMBULA; CITY OF LEMON
GROVE; and DOES 1 through 1,000,

15 Defendants.
16

CASE NO. 37-2018-00023369-CU-PO-CTL

COMPLAINT FOR DAMAGES

17 Plaintiff CHRISTOPHER WILLIAMS ("Plaintiff") alleges as follows:

18 **Parties**

19 1. Plaintiff is a natural person and a resident of the City of San Diego.

20 2. Defendant DAVID ARAMBULA ("ARAMBULA") is a resident of the City of Lemon
21 Grove and a member of the Lemon Grove City Council; he is being sued in his private capacity and,
22 alternatively, in his official capacity. Defendant CITY OF LEMON GROVE ("CITY") is a municipal
23 corporation located in the County of San Diego.

24 3. The true names and capacities of the Defendants identified as DOES 1 through 1,000
25 are unknown to Plaintiff, who will seek the Court's permission to amend this pleading in order to allege
26 the true names and capacities as soon as they are ascertained. Plaintiff is informed and believes and
27 on that basis alleges that each of the fictitiously named Defendants 1 through 1,000 has some
28 cognizable liability or some cognizable interest in the subject matter of this lawsuit.

1 4. Plaintiff is informed and believes and on that basis alleges that, at all times stated in this
2 pleading, each Defendant was the agent, servant, or employee of every other Defendant and was, in
3 doing the things alleged in this pleading, acting within the scope of said agency, servitude, or
4 employment and with the full knowledge or subsequent ratification of his principals, masters, and
5 employers. Alternatively, in doing the things alleged in this pleading, each Defendant was acting alone
6 and solely to further his own interests.

7 Background Information

8 5. Prior to July 15, 2017, Plaintiff had caused to be submitted to CITY one or more
9 applications for permission to operate a medical marijuana dispensary (“MMD”) at various locations
10 within CITY’s geographic jurisdiction. At least one of those applications was pending approval by
11 CITY as of July 15, 2017.

12 6. On or about July 15, 2017, ARAMBULA contacted Plaintiff and invited Plaintiff to
13 come to his (ARAMBULA’s) home to discuss the status of Plaintiff’s MMD applications and to share
14 information on the topic. Plaintiff agreed to go to ARAMBULA’s home for the meeting. During the
15 meeting, ARAMBULA began drinking and eventually took off his clothes to go skinny-dipping in the
16 pool. Plaintiff is informed and believes and on that basis alleges that later during the meeting
17 ARAMBULA was video-recorded naked in the pool with a woman on the pool deck yelling:
18 “Woooooo! Go, David! Go, David! Go, David! [Inaudible.] Where’s the 10 inches? Where’s the 10
19 inches? Where’s the 10 inches? Woooooo!”

20 7. After it became apparent that ARAMBULA was not prepared to discuss Plaintiff’s
21 MMD applications, Plaintiff decided to leave. He went toward the front of ARAMBULA’s home to
22 use his (Plaintiff’s) phone to schedule an Uber driver to pick him up. While Plaintiff was looking down
23 at his phone, ARAMBULA hit Plaintiff in the head with a bottle and bit, kicked, punched, and choked
24 him. This attack was entirely unprovoked. Plaintiff was seriously injured, suffering a fractured rib,
25 a forehead contusion, a laceration to his eyebrow, and bites to his forearms.

26 8. Following the attack, Plaintiff received medical attention and incurred substantial
27 physical, emotional, and economic damages as a result of the attack by ARAMBULA. A true and
28

1 correct copy of photographs taken of Plaintiff while receiving medical attention is attached hereto as
2 Exhibit "A" and incorporated herein by reference.

3 9. Plaintiff believes that after a reasonable opportunity to conduct discovery he will be able
4 to establish: (A) ARAMBULA had a practice of conducting official CITY business at his home or other
5 locations beyond City Hall. (B) CITY's leadership knew that ARAMBULA had a practice of
6 conducting official CITY business at locations beyond City Hall but never took any action to prevent
7 ARAMBULA from continuing to do so. (C) CITY's leadership knew that ARAMBULA could be
8 physically violent toward members of the public while he conducted official CITY business but never
9 took any action to prevent him from acting in such a manner.

10 **Notice Requirements and Time Limitations**

11 10. On or about January 11, 2018, Plaintiff submitted a tort claim to CITY for the damages
12 being sought in this lawsuit. On or about February 26, 2018, CITY denied the tort claim.

13 **FIRST CAUSE OF ACTION:**
14 **ASSAULT AND BATTERY**
(Against All Defendants)

15 11. Paragraphs 1 through 10 are fully incorporated into this paragraph.

16 12. ARAMBULA committed assault and battery against Plaintiff. At no time did Plaintiff
17 provoke ARAMBULA. ARAMBULA was the sole aggressor.

18 13. As a result of the substantial physical, emotional, and economic harm that ARAMBULA
19 inflicted on Plaintiff, he (Plaintiff) has been damaged in an amount to be proven at trial but in excess
20 of the amount that establishes the Court's unlimited jurisdiction over this lawsuit.

21 14. ARAMBULA assaulted and battered Plaintiff with malice and oppression sufficient to
22 entitle Plaintiff to recover punitive and exemplary damages (against ARAMBULA only).

23 **SECOND CAUSE OF ACTION:**
24 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
(Against All Defendants)

25 15. Paragraphs 1 through 14 are fully incorporated into this paragraph.

26 16. ARAMBULA physically attacked Plaintiff with the intent to inflict emotional distress
27 on him. ARAMBULA's attack has caused Plaintiff to suffer substantial emotional distress.
28

1 17. As a result of the substantial emotional distress that ARAMBULA inflicted on Plaintiff,
2 he (Plaintiff) has been damaged in an amount to be proven at trial but in excess of the amount that
3 establishes the Court's unlimited jurisdiction over this lawsuit.

4 18. ARAMBULA caused Plaintiff to suffer substantial emotional distress with malice and
5 oppression sufficient to entitle Plaintiff to recover punitive and exemplary damages against
6 ARAMBULA (against ARAMBULA only).

7 **THIRD CAUSE OF ACTION:**
8 **NEGLIGENCE**
9 **(Against All Defendants)**

10 19. Paragraphs 1 through 18 are fully incorporated into this paragraph.

11 20. ARAMBULA injured Plaintiff, inflicted emotional distress on him, and did not conduct
12 himself as a reasonably prudent person would have conducted himself.

13 21. As a result of the injuries that ARAMBULA inflicted on Plaintiff, he (Plaintiff) has been
14 damaged in an amount to be proven at trial but in excess of the amount that establishes the Court's
15 unlimited jurisdiction over this lawsuit.

16 **Prayer**

17 FOR ALL THESE REASONS, Plaintiff respectfully prays for the following relief against
18 Defendants (and any and all other parties who may oppose Plaintiff in this proceeding):

- 19 A. General damages according to proof;
20 B. Special damages according to proof;
21 C. Exemplary and punitive damages according to proof (but not against CITY);
22 D. Any and all court costs and other legal expenses incurred by Plaintiff in connection with
23 this proceeding; and
24 E. Any and all further relief that this Court may deem appropriate.

25 Date: May 9, 2018.

26 Respectfully submitted,

27 BRIGGS LAW CORPORATION

28 By:

Cory J. Briggs

Cory J. Briggs

Attorneys for Plaintiff Christopher Williams

COMPLAINT FOR DAMAGES

Exhibit "A"









EXHIBIT 2









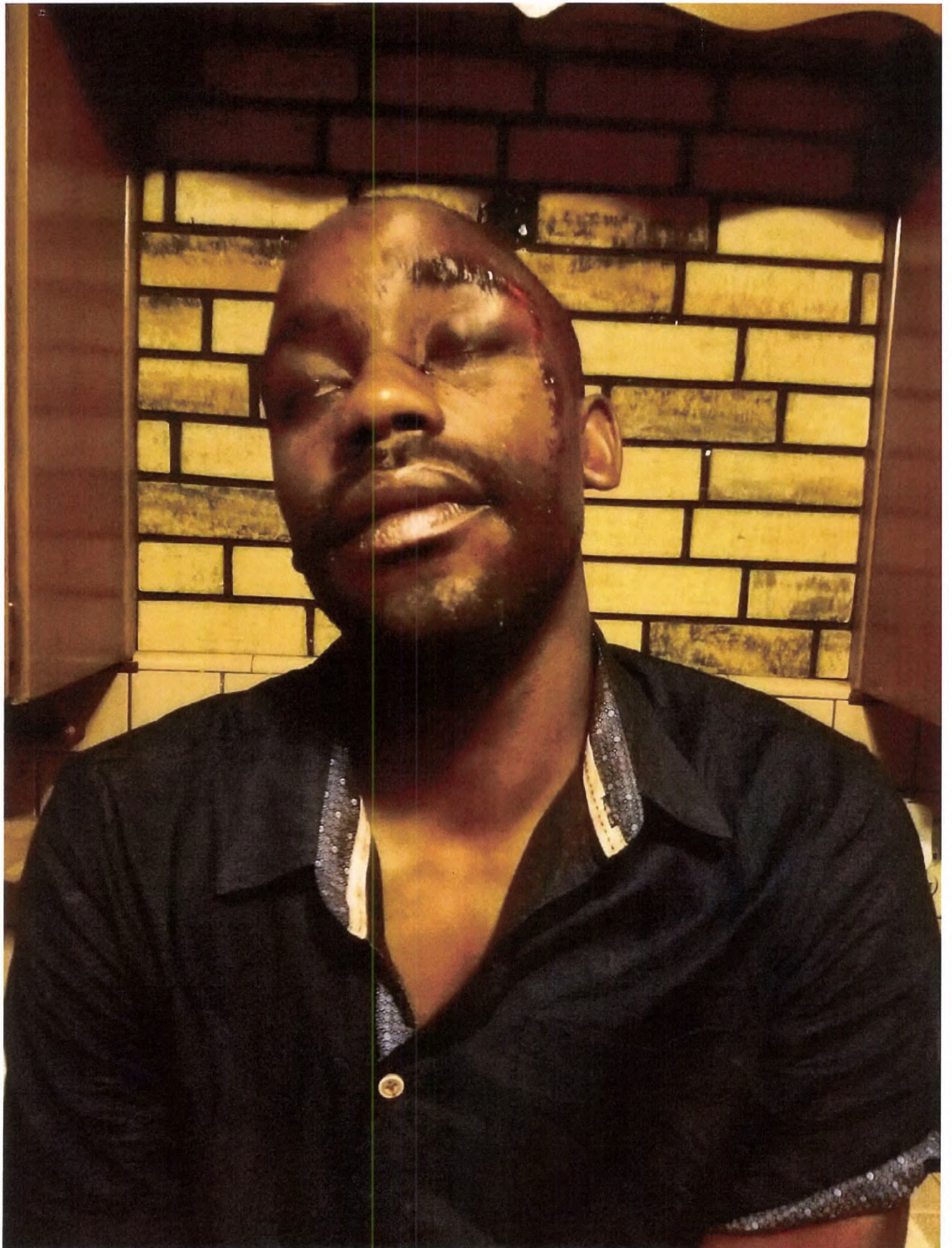








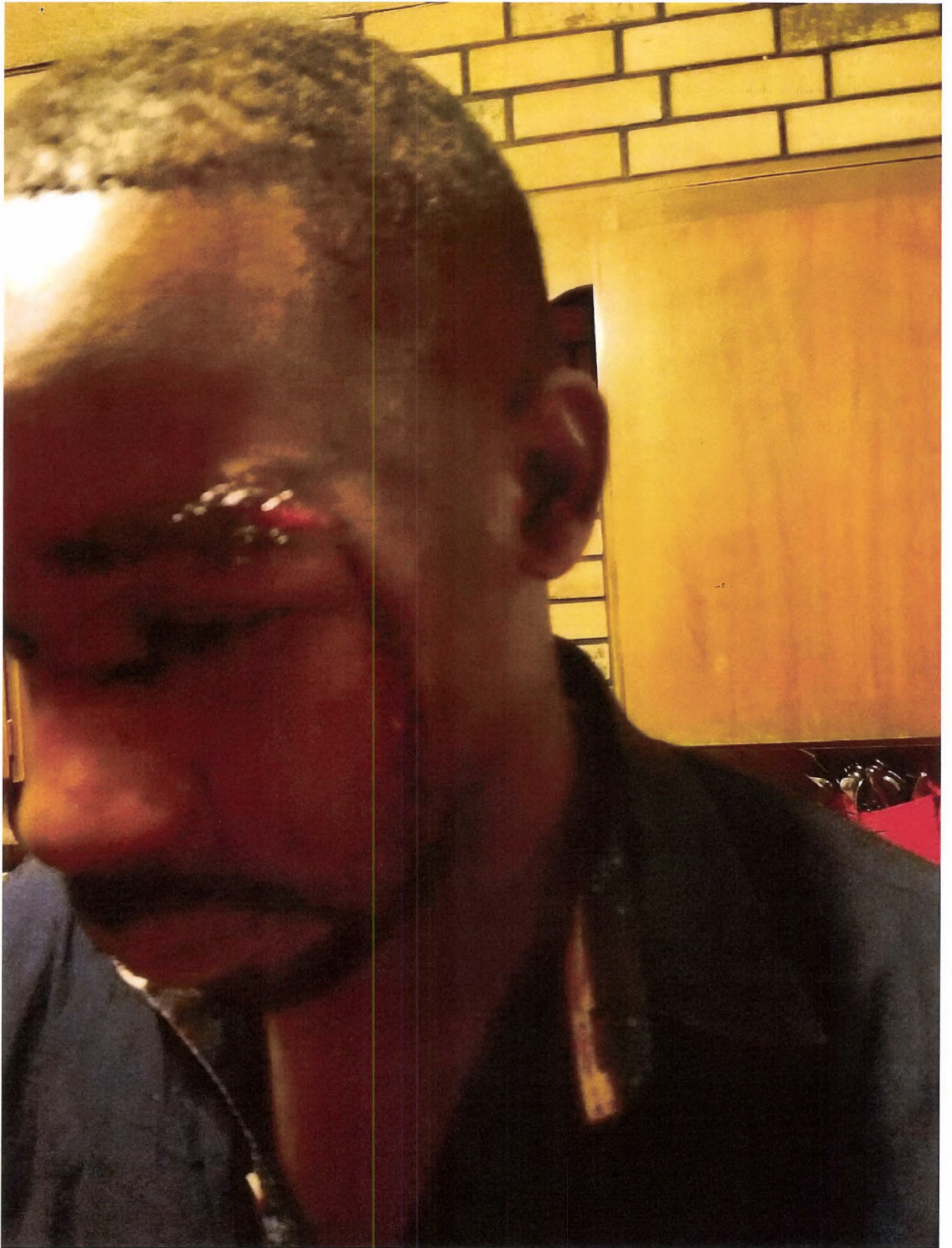


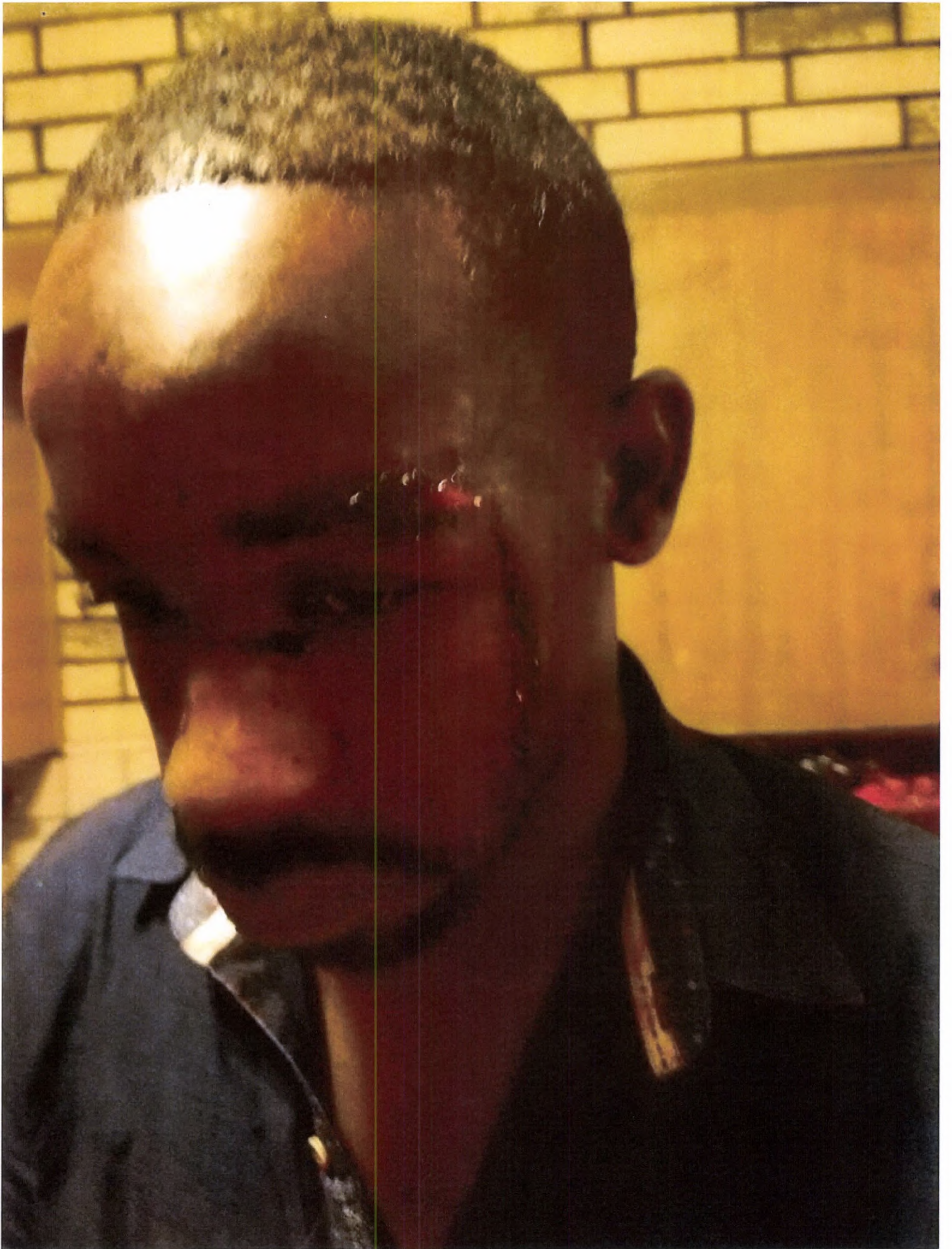


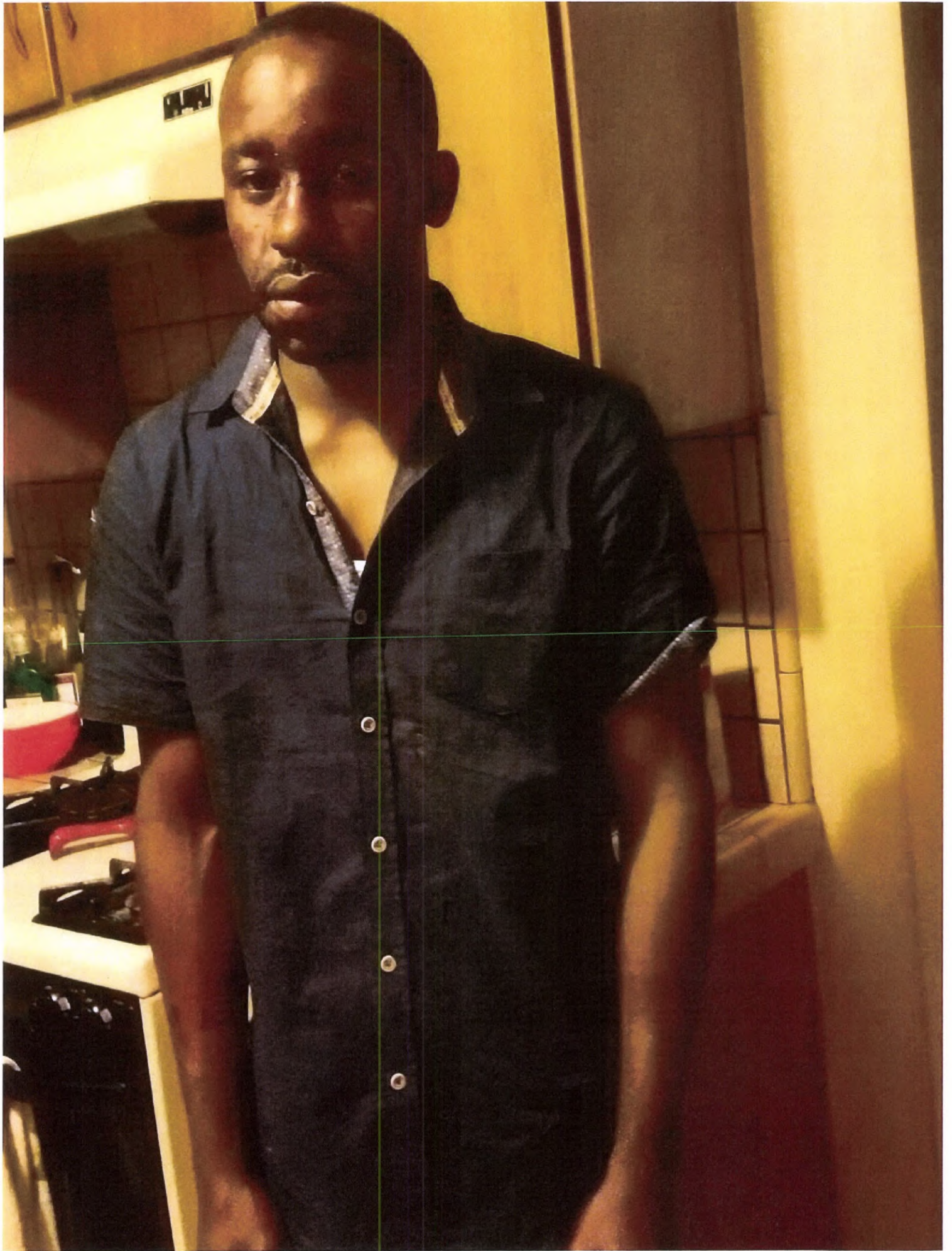




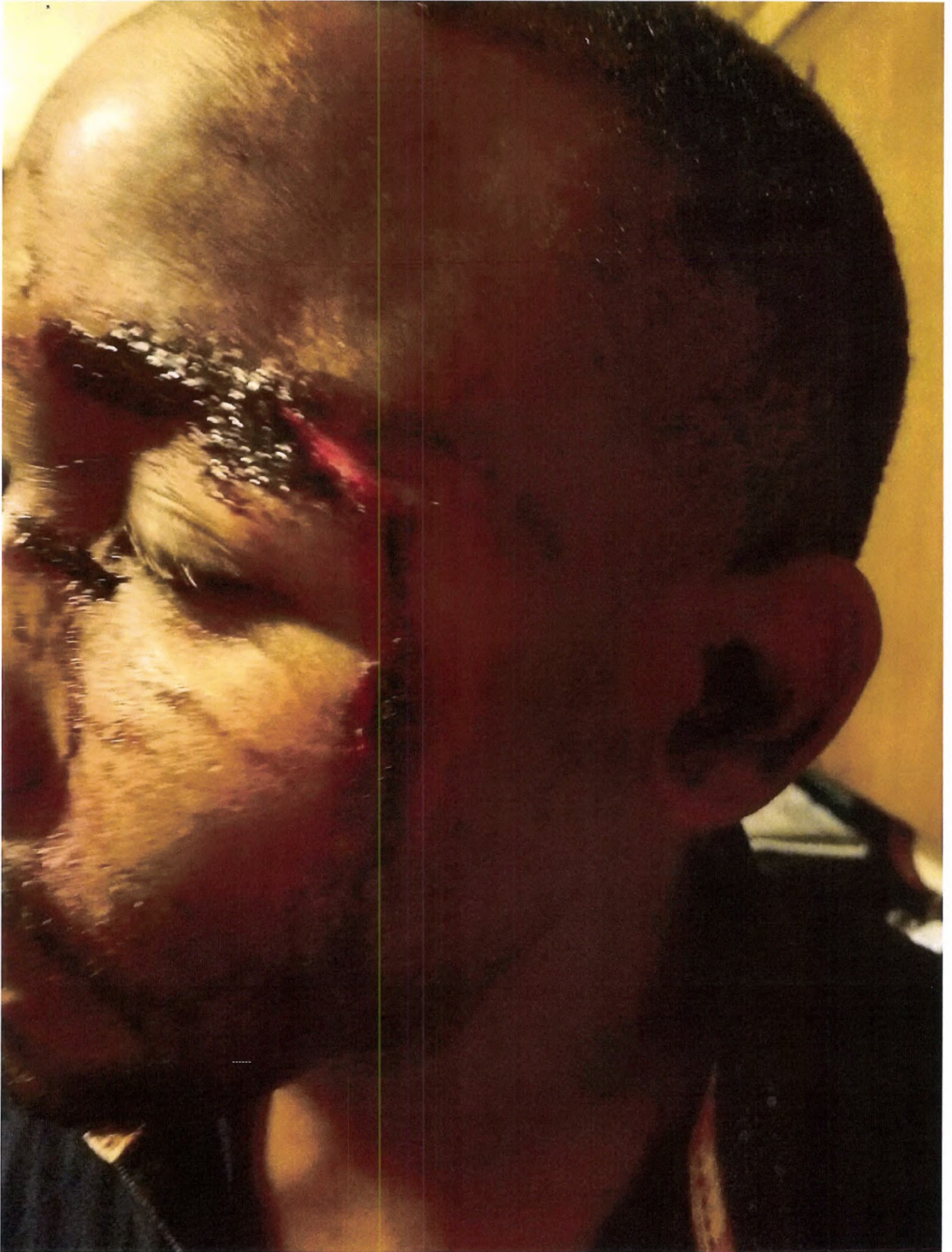






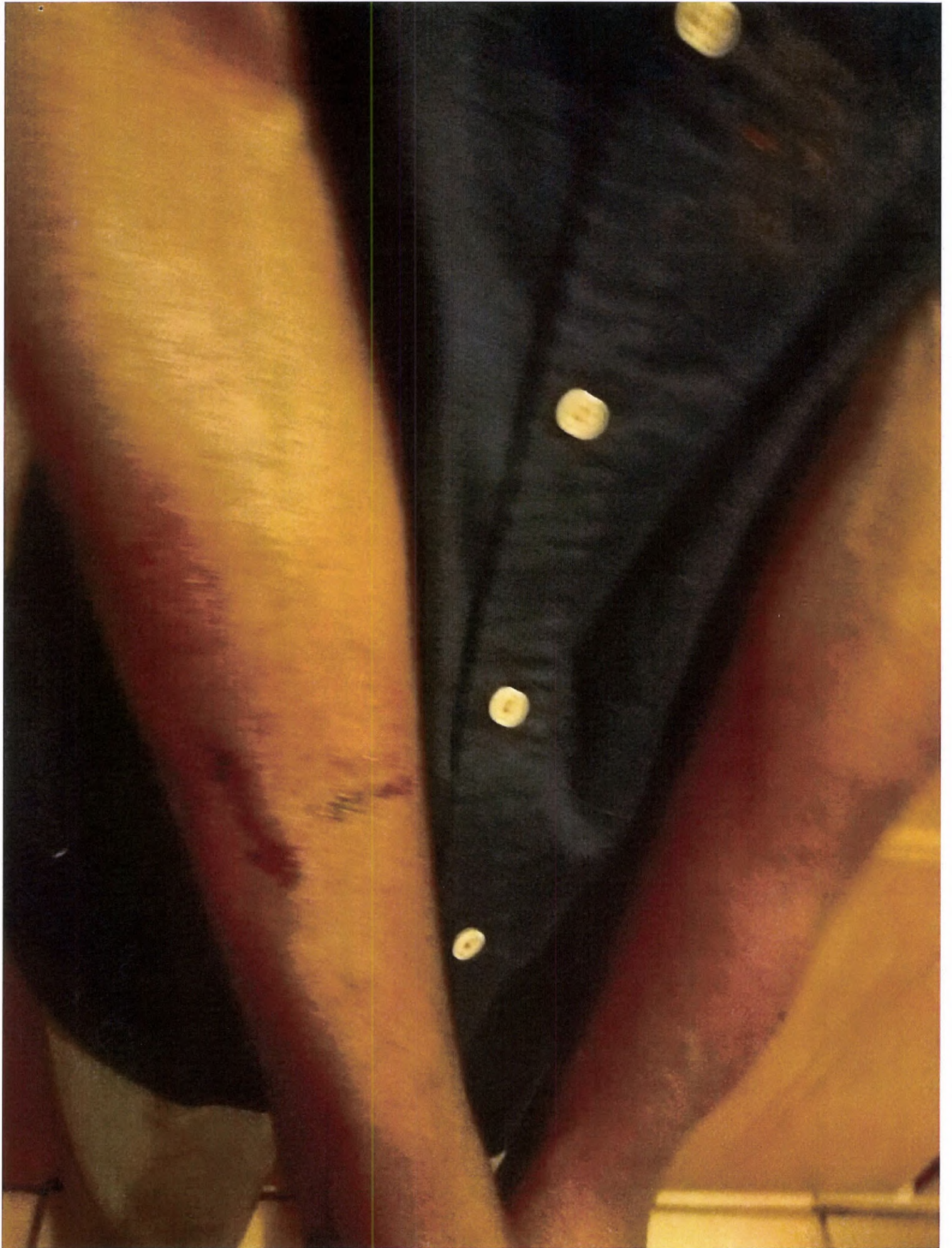












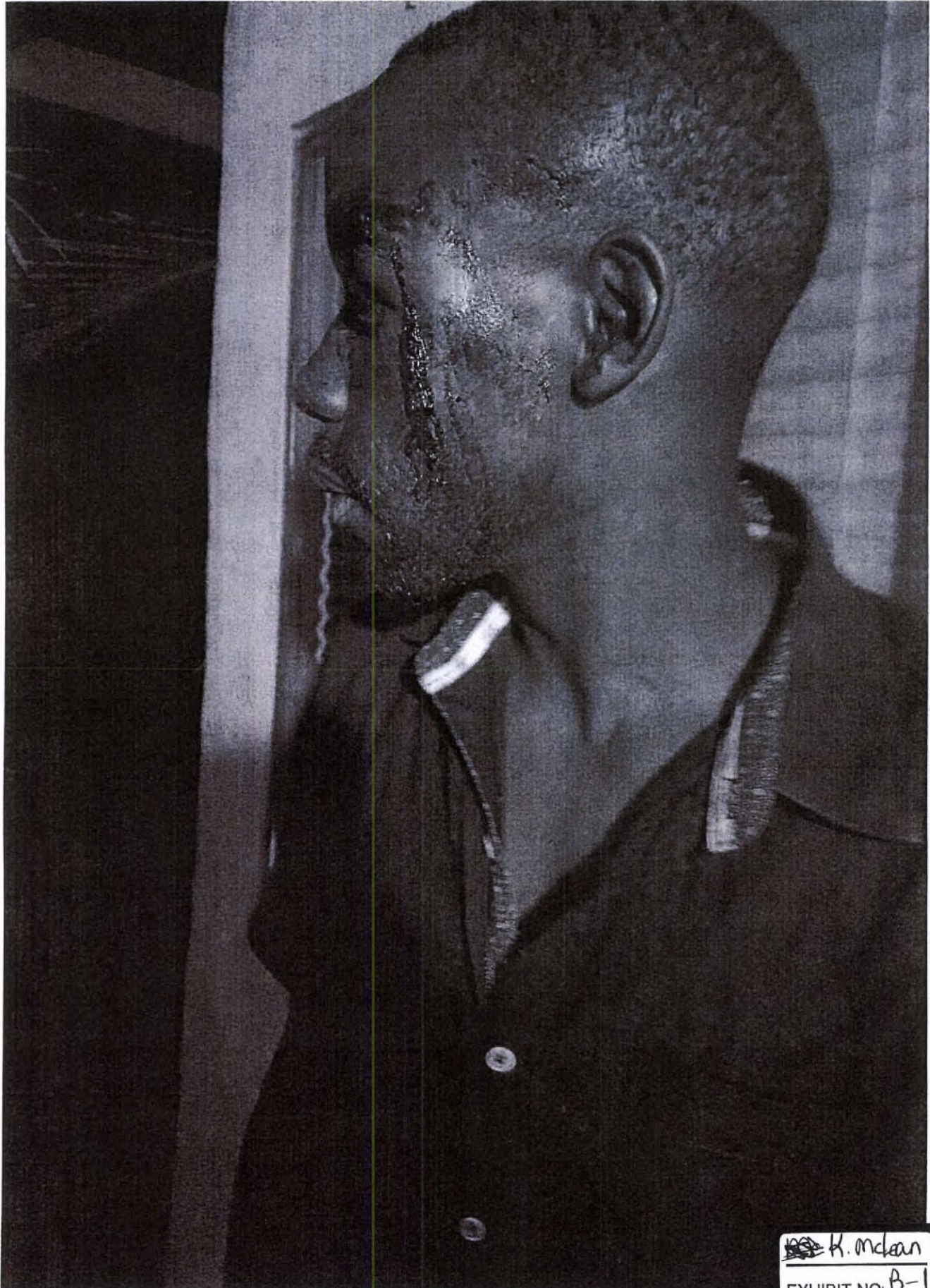


BLUEBIRDHOME.COM (888) 477-9700

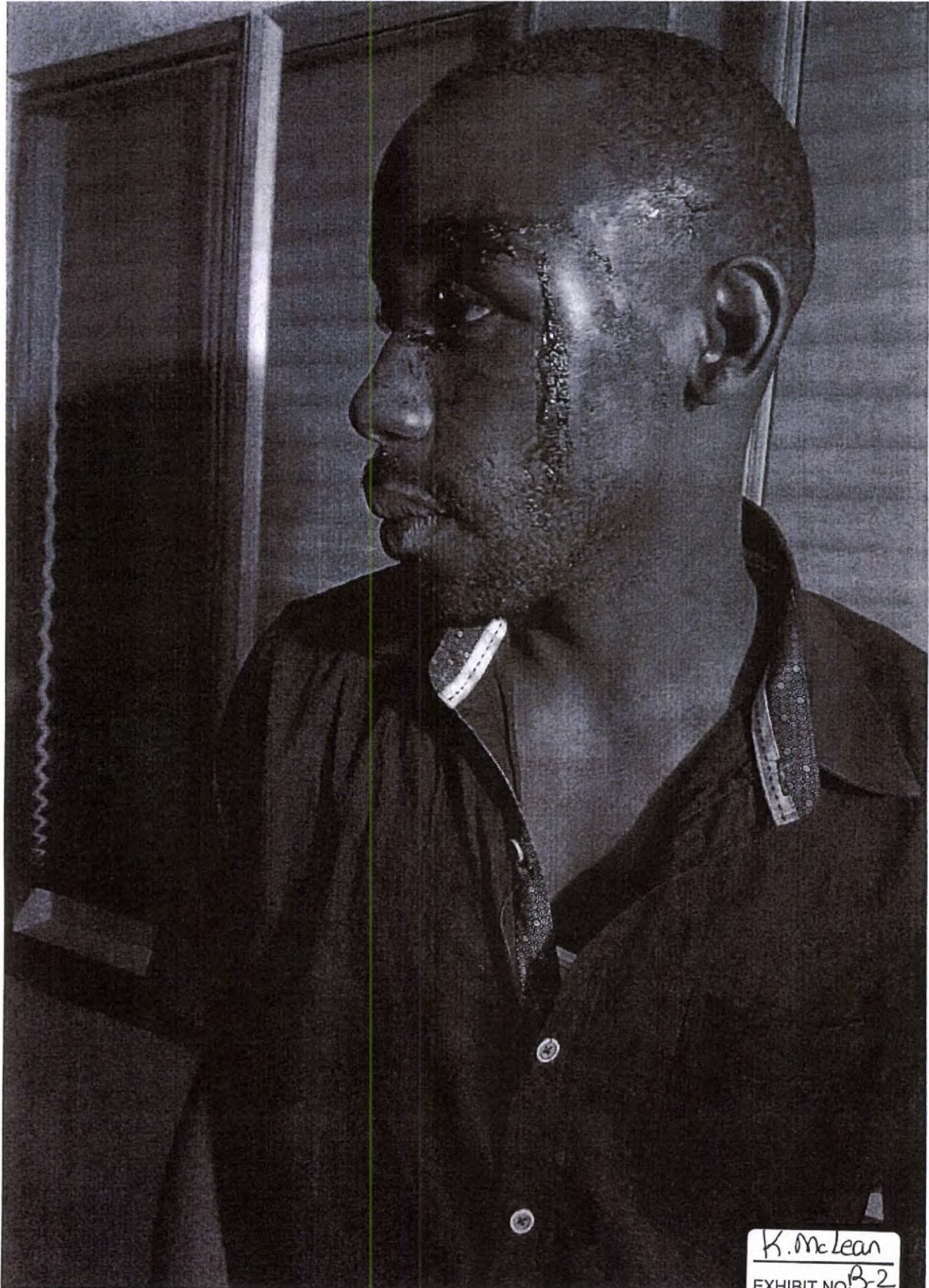


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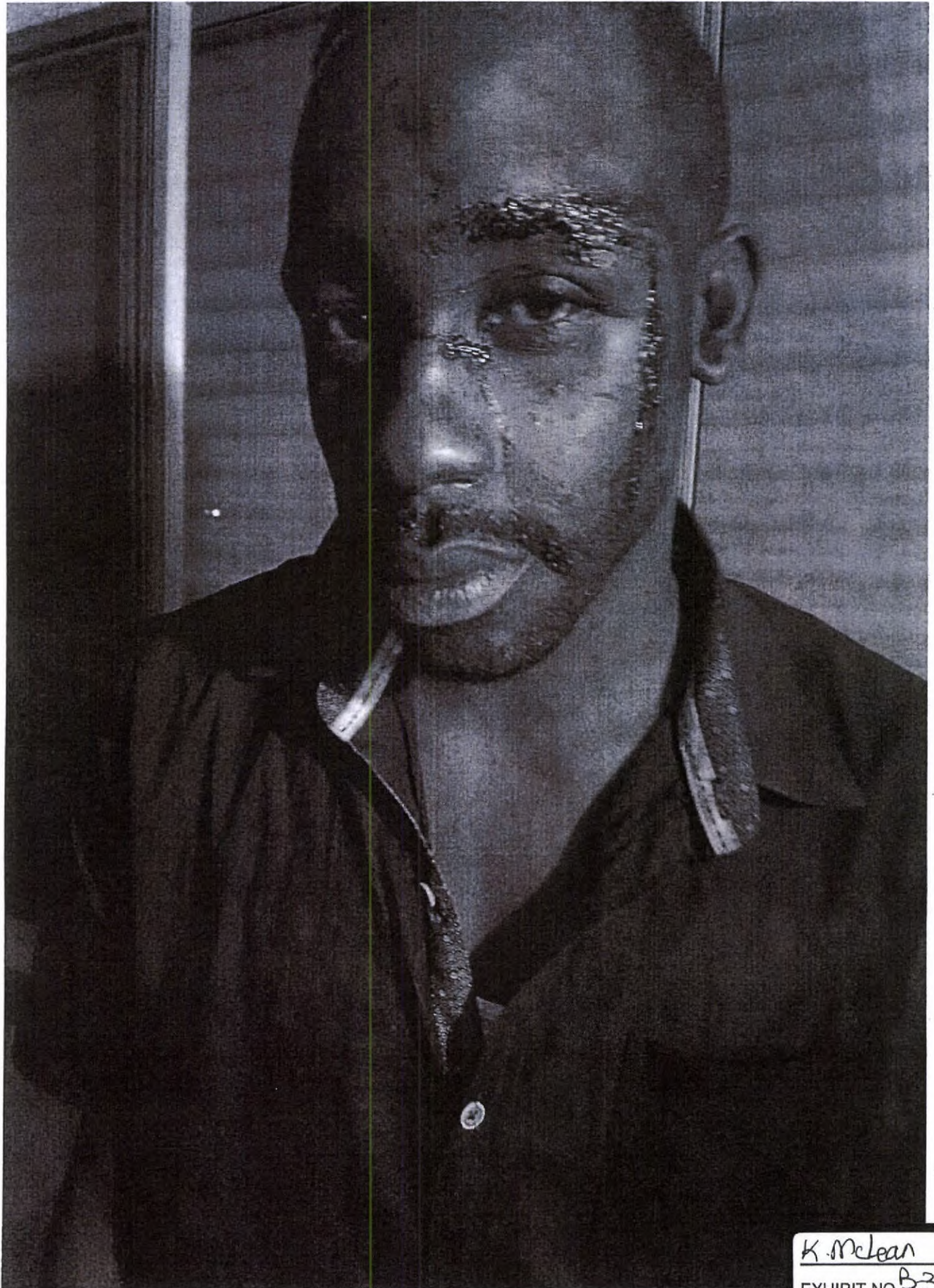
EXHIBIT 3



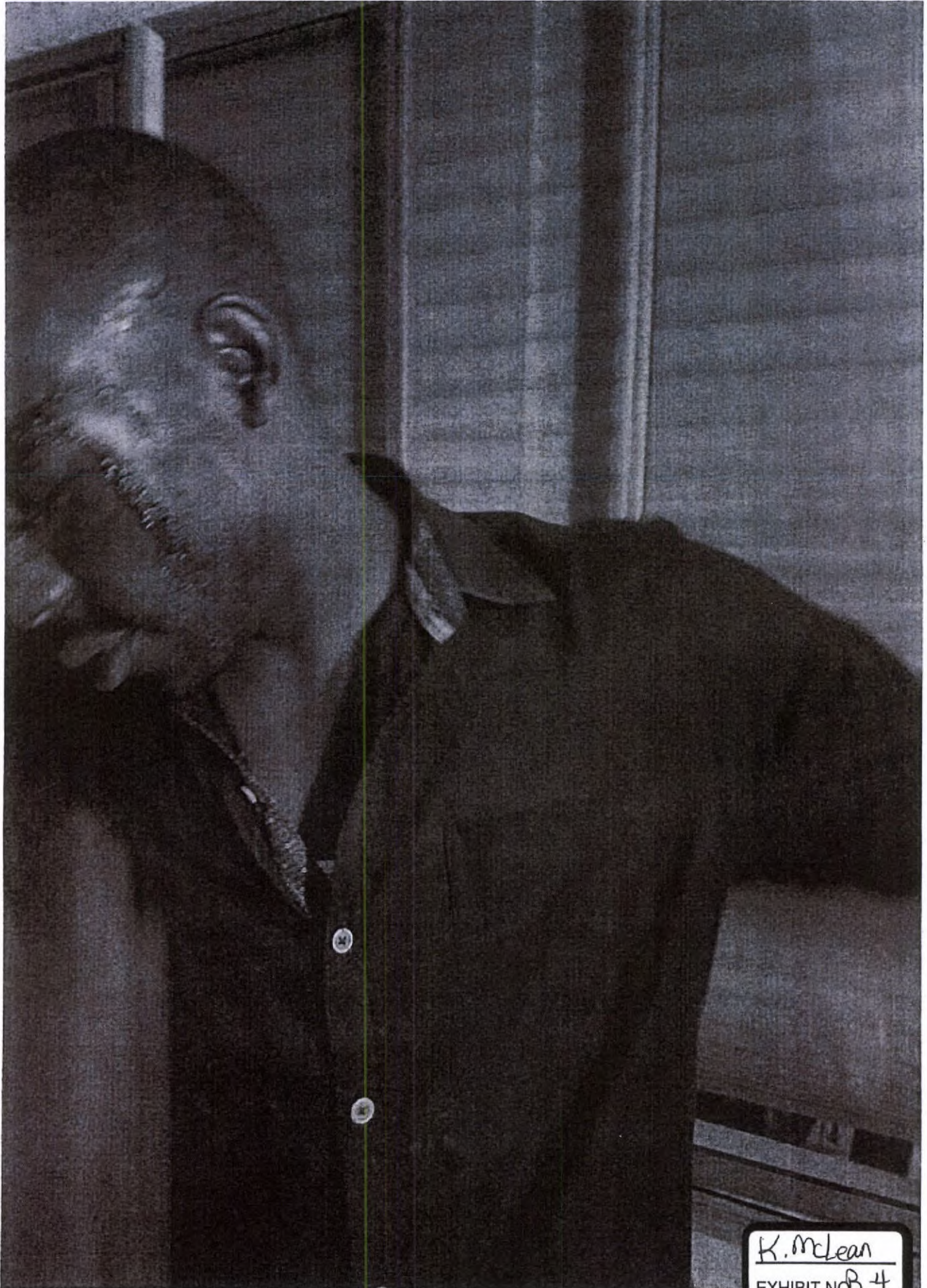
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3-27-19
L. Barron. CSR



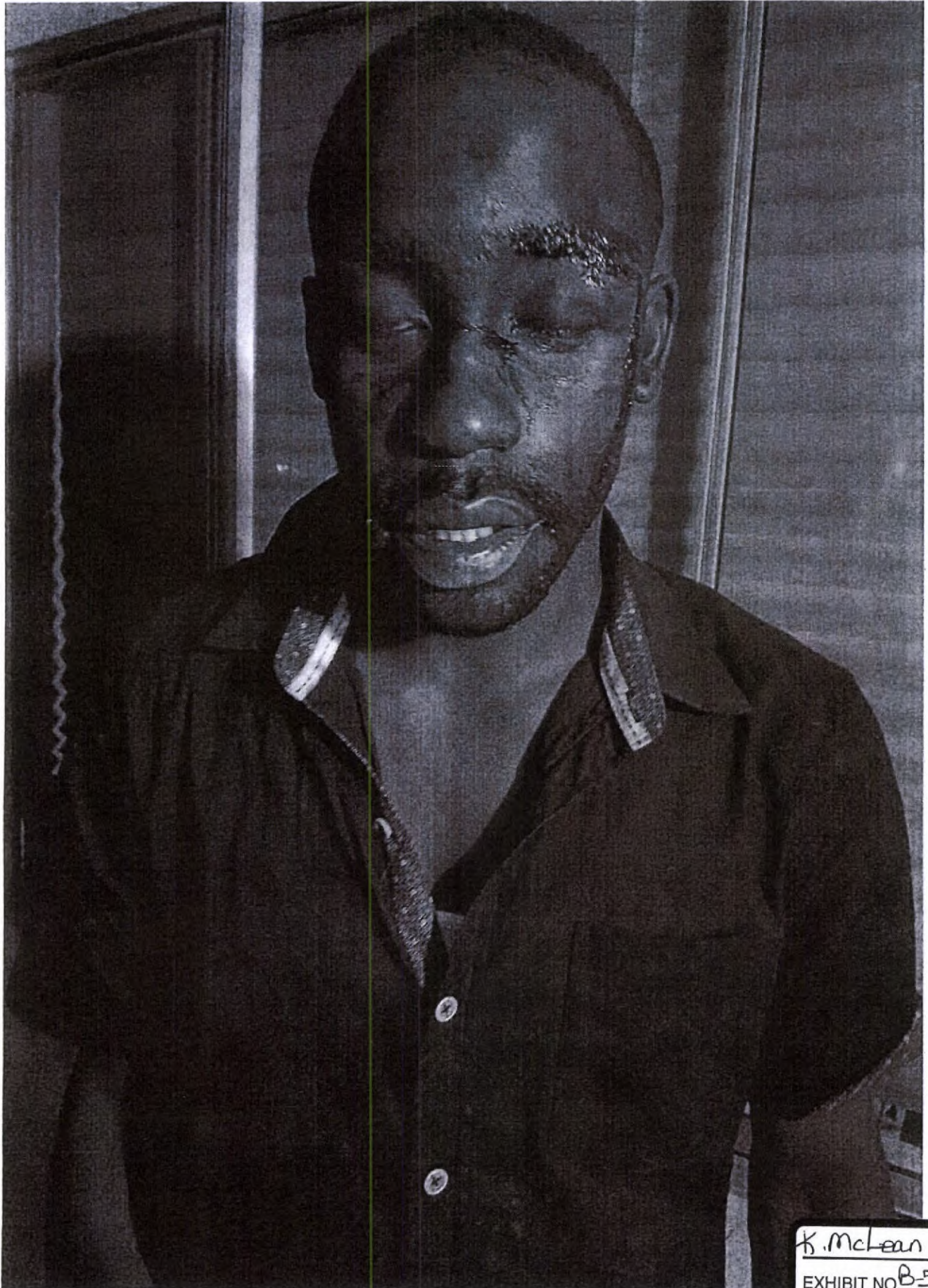
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EXHIBIT NO: B-2
3-27-19
L. Barrón, CSR



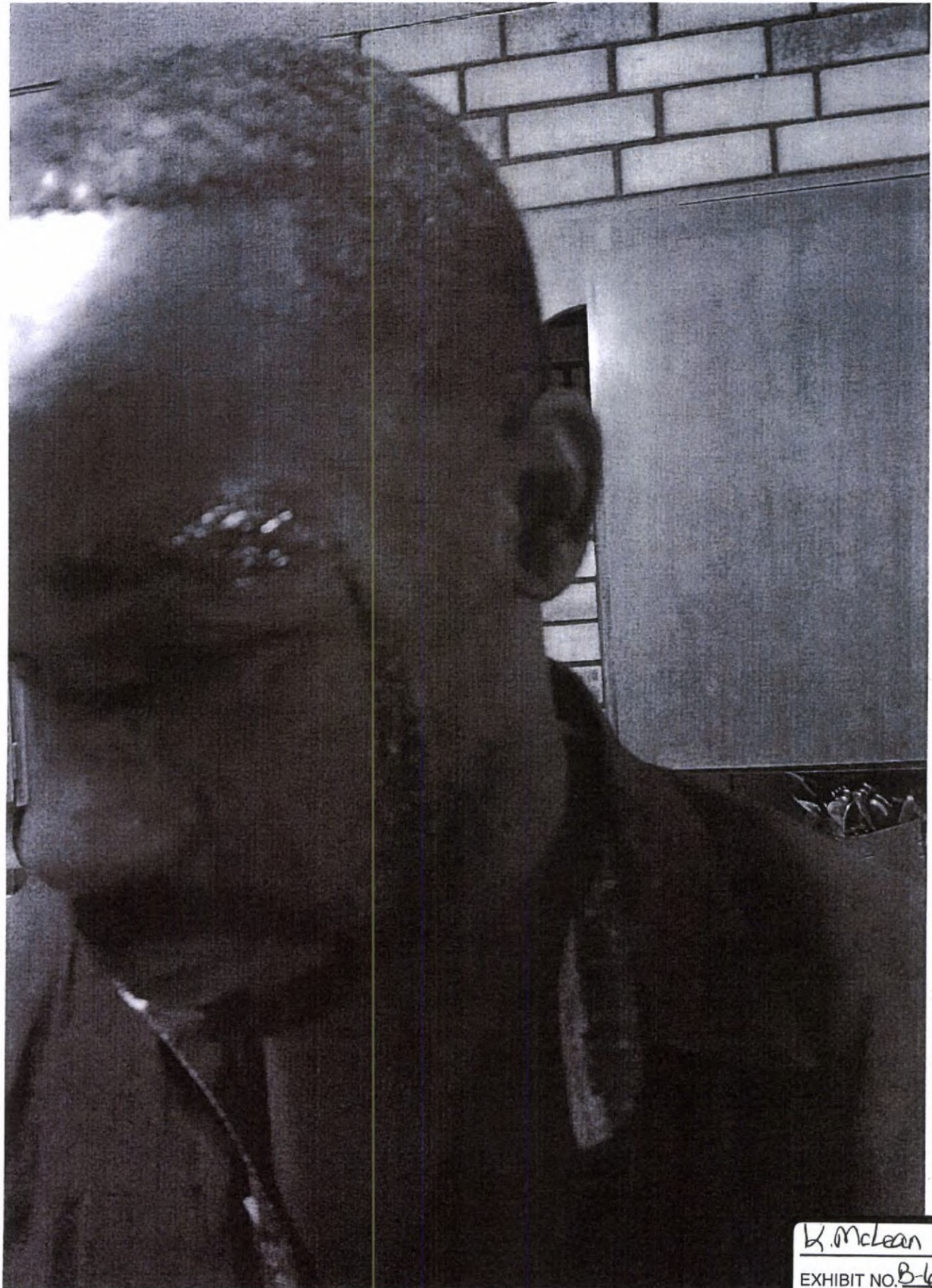
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3-27-19
L. Barrón, CSR



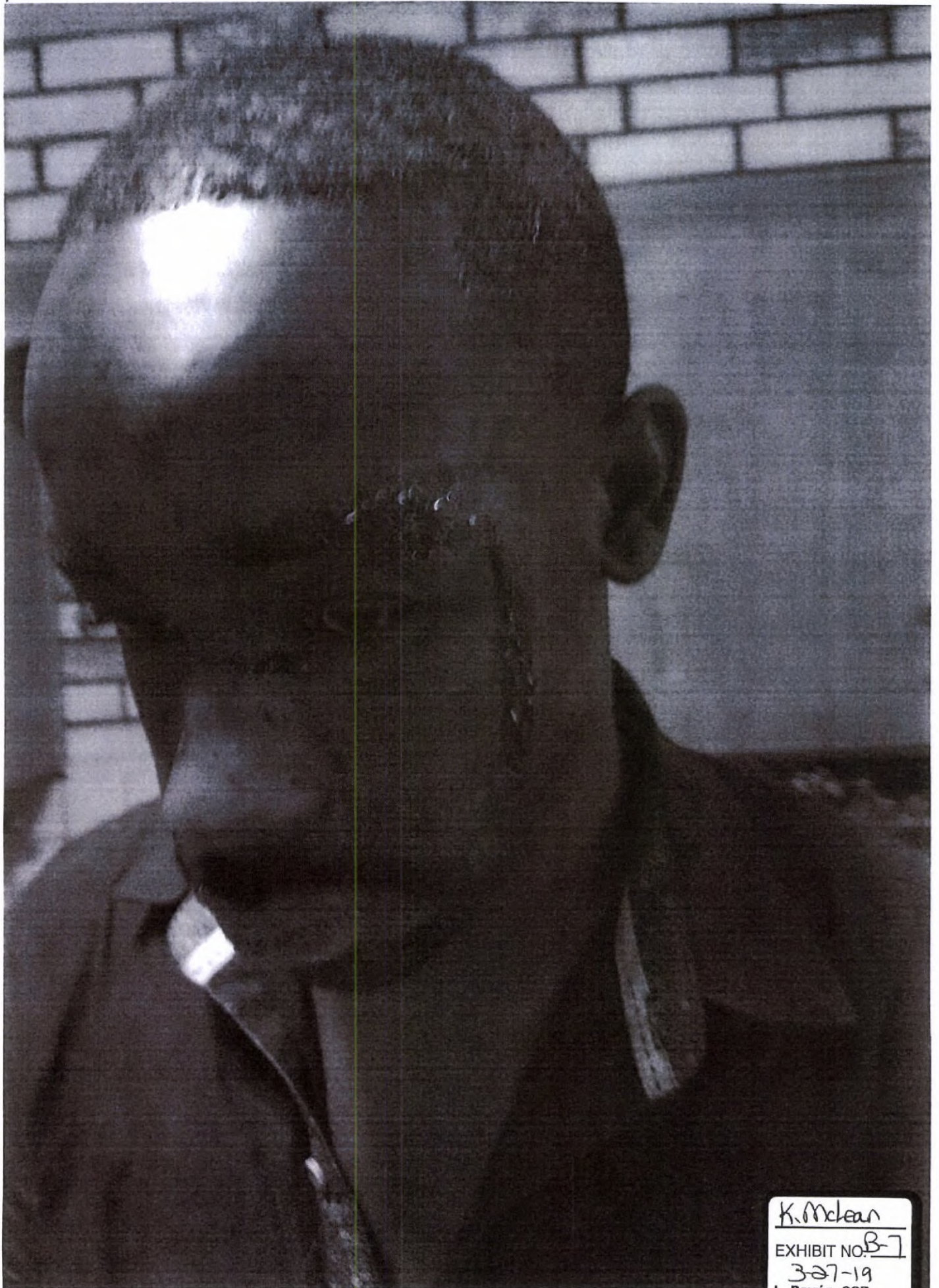
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L. Barrón. CSR



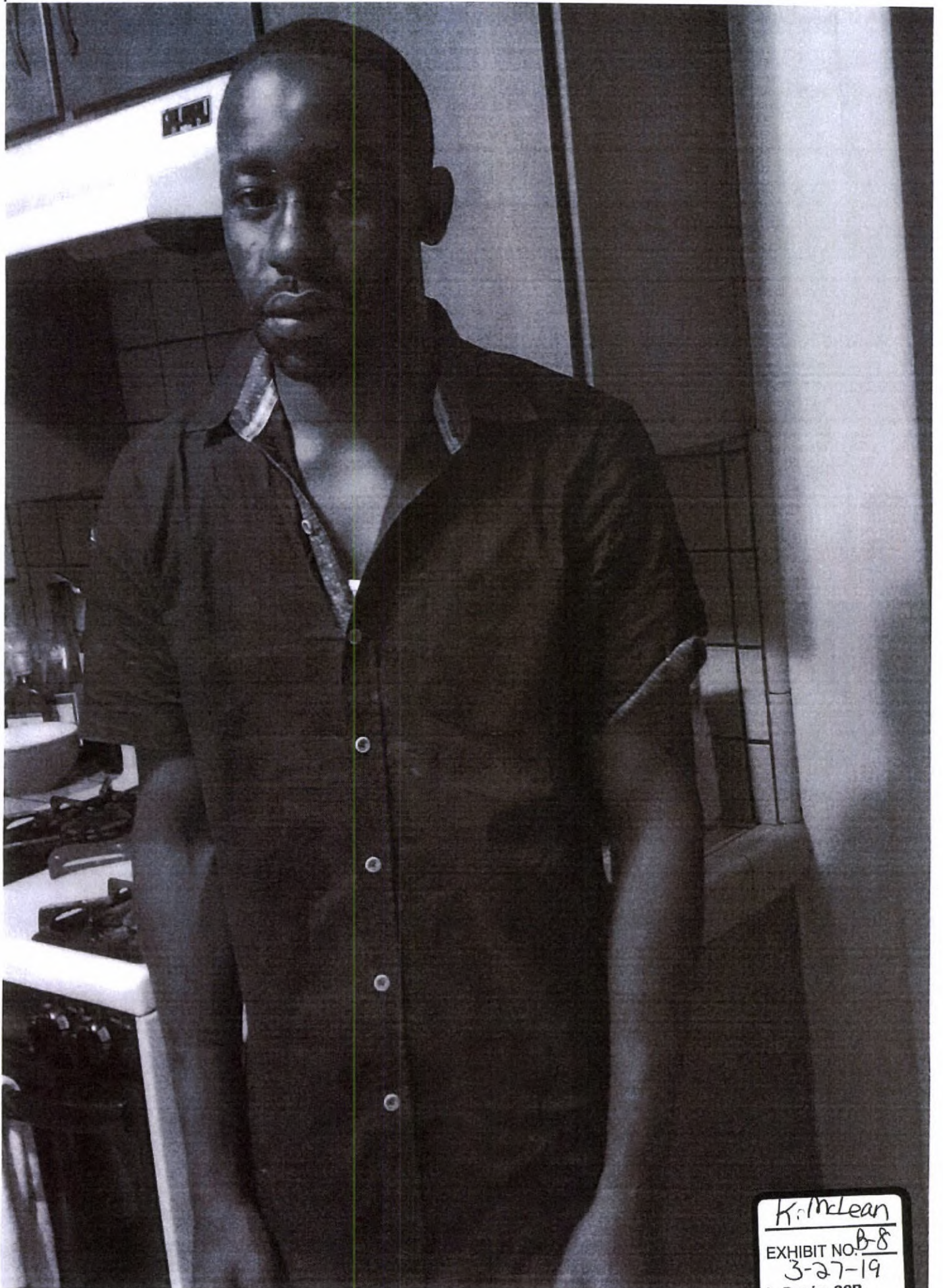
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L. Barrón, CSR



K. McLean
EXHIBIT NO. B-6
3-27-19
L. Barrón, CSR



K. Mclean
EXHIBIT NO. B-7
3-27-19
L. Barrón, CSR




K. McLean
EXHIBIT NO. B-8
3-27-19
L. Barrón, CSR



K Mclean
EXHIBIT NO. B9
3-27-19
L. Barrón, CSR

K. McLean
B-10
EXHIBIT NO. 3-27-19
L. Barrón, CSR



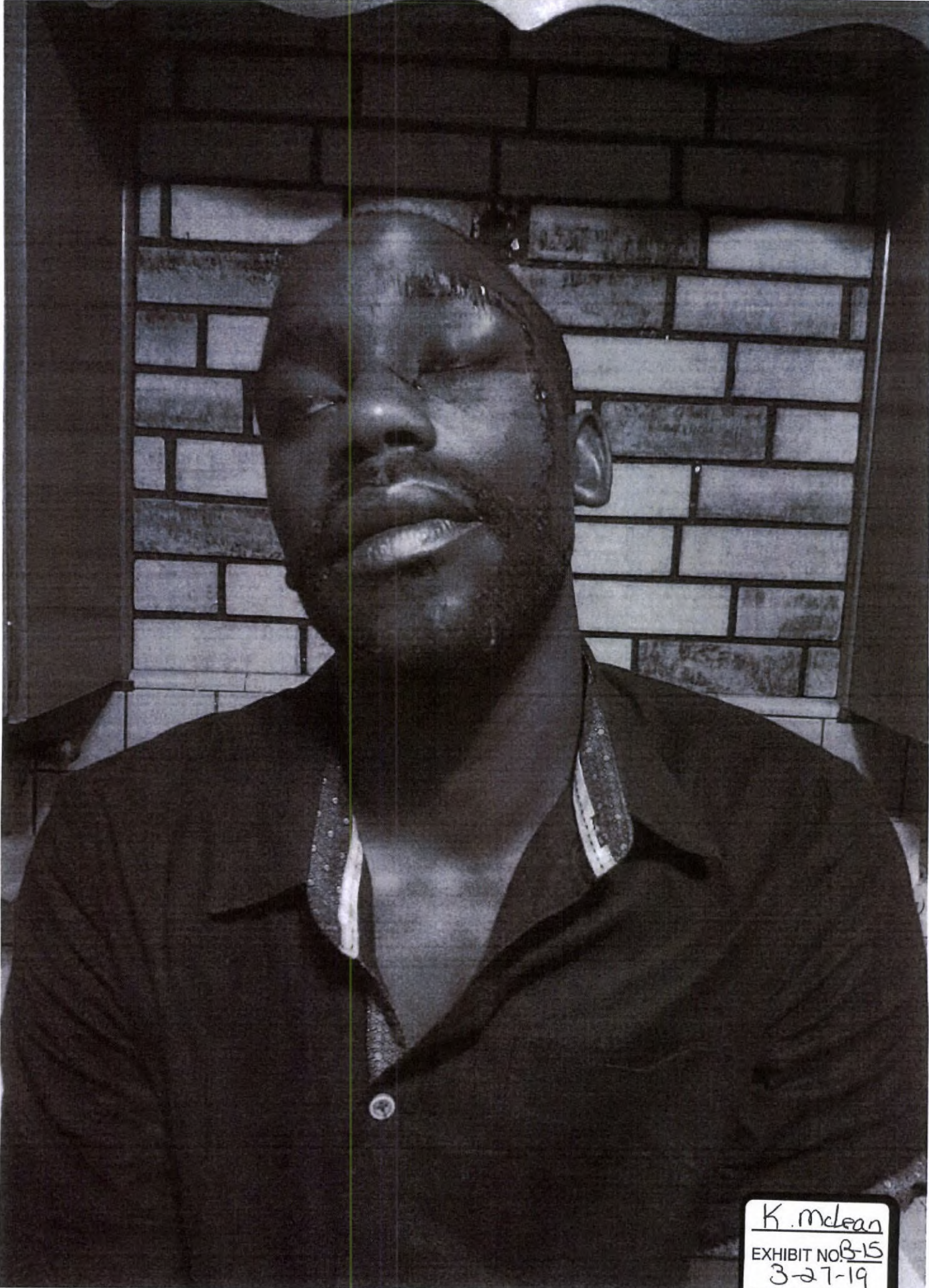
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L. Barrón, CSR

K. Mclean
EXHIBIT NO. B-12
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L. Barrón, CSR

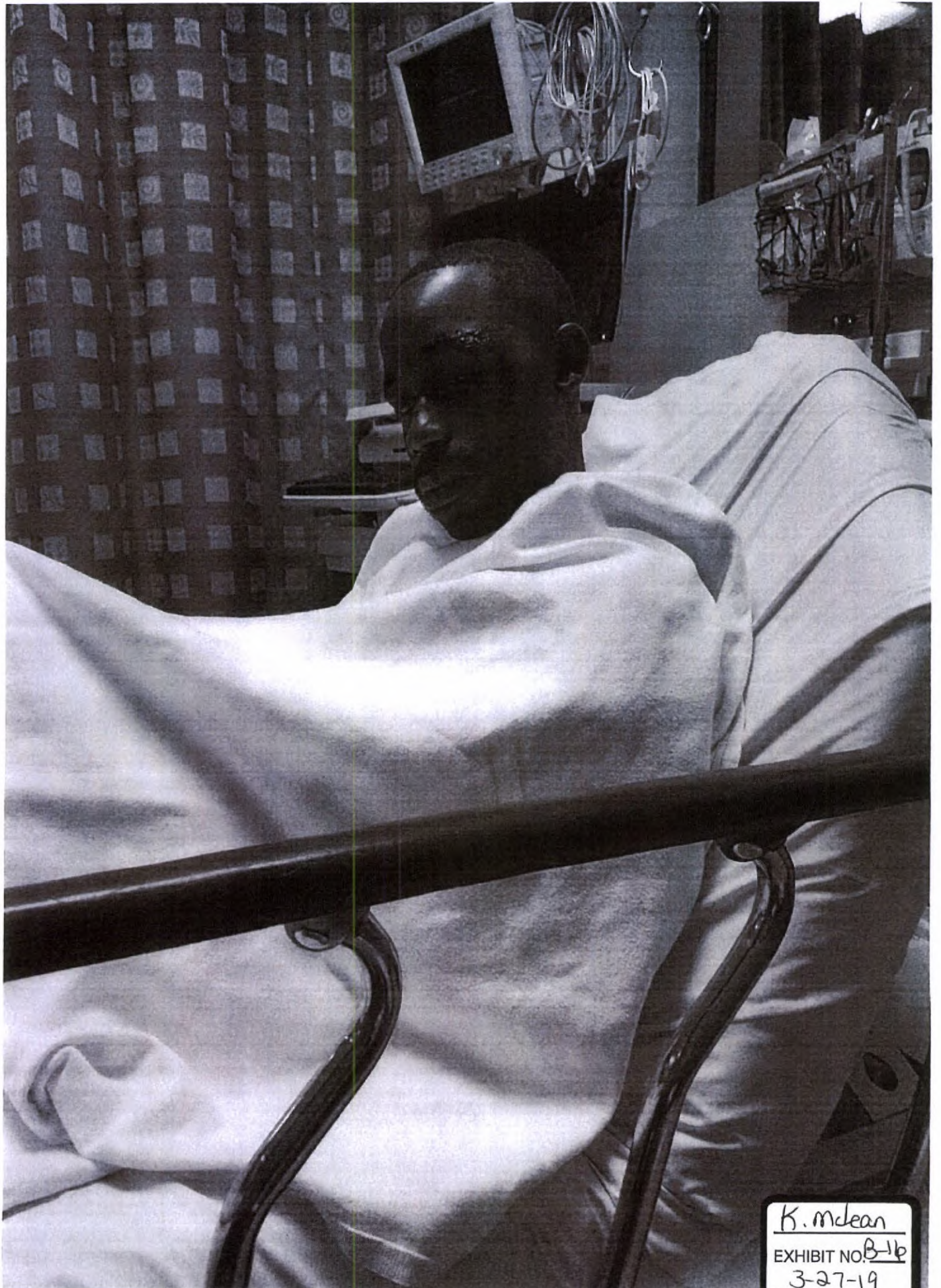
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L. Barrón, CSR



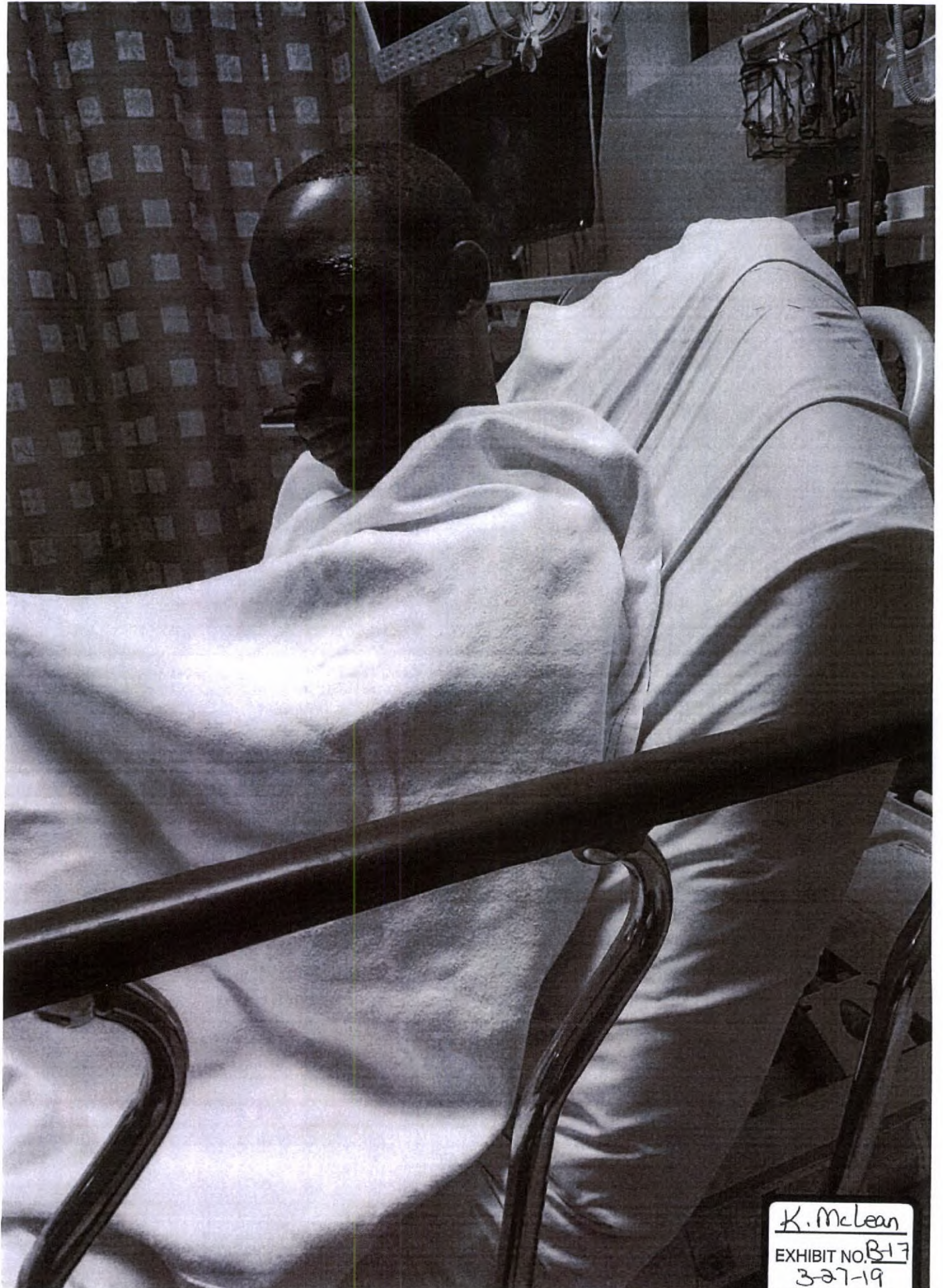
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3-27-19
L. Barrón, CSR



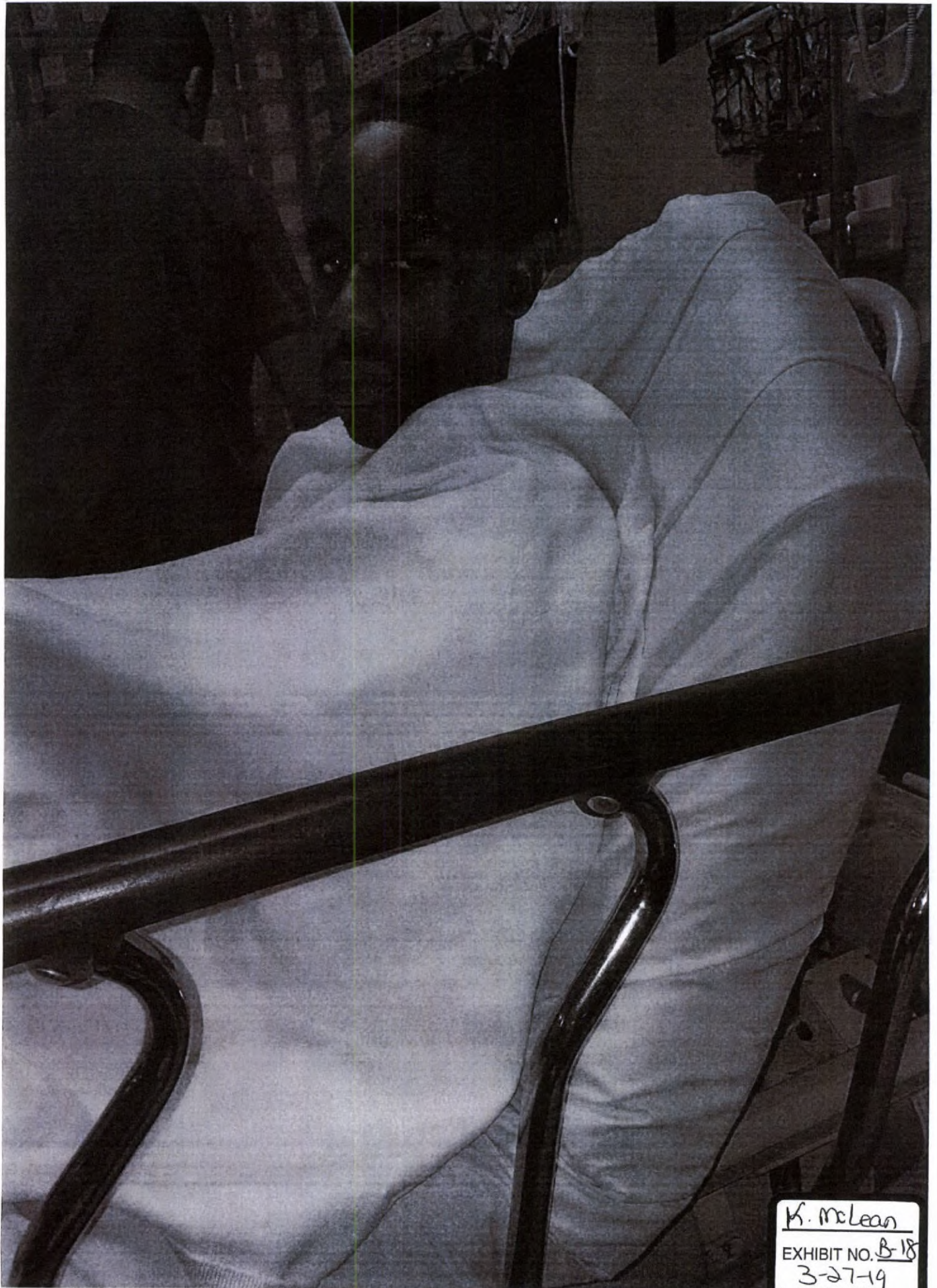
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EXHIBIT NO. B-15
3-27-19
L. Barrón, CSR



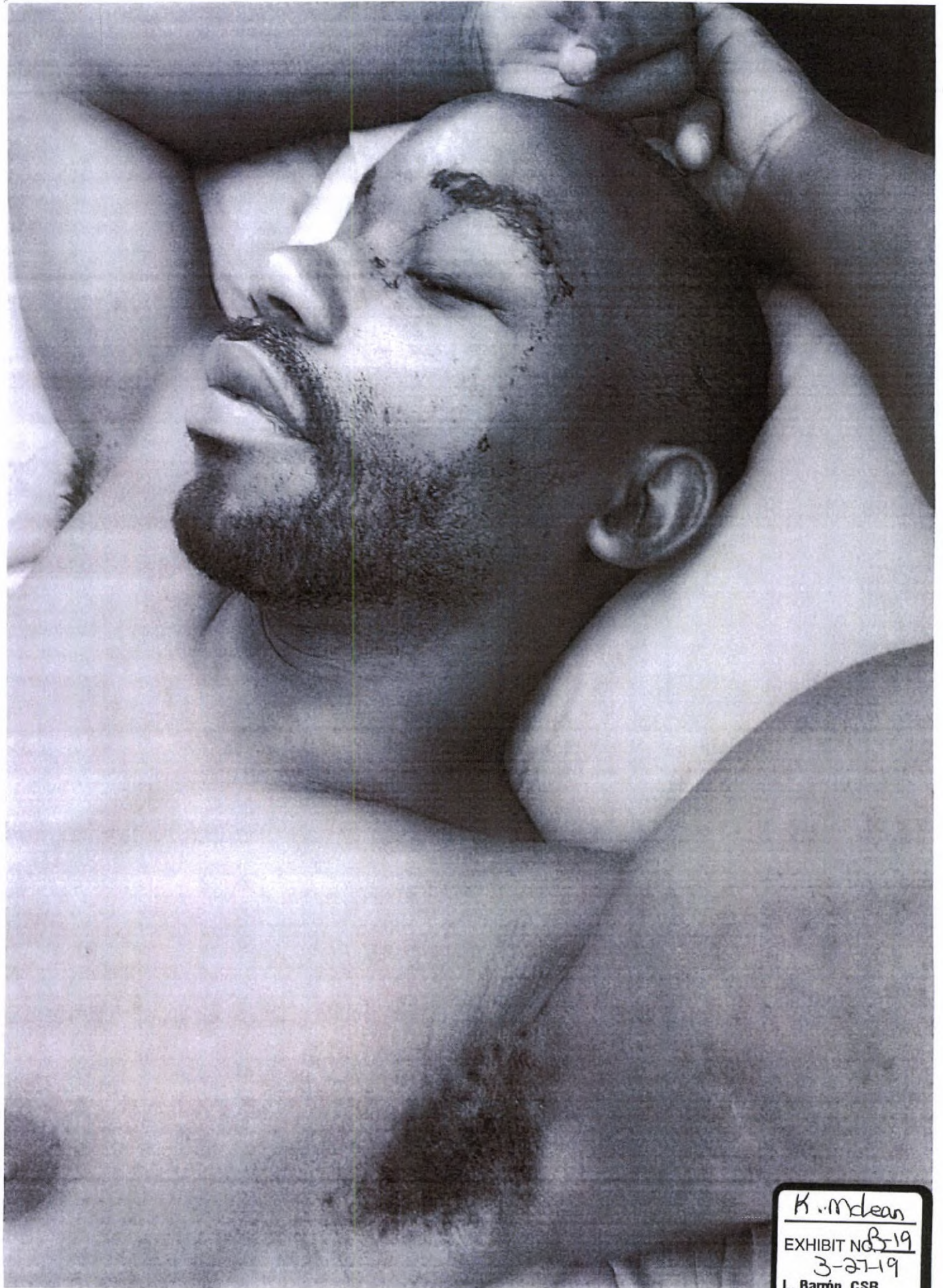
K. Mclean
EXHIBIT NO. B-16
3-27-19
L. Barrón, CSR



K. McLean
EXHIBIT NO. B-17
3-27-19
L. Barrón, CSR



K. McLean
EXHIBIT NO. B-18
3-27-19
L. Barrón, CSR



K. Mclean
EXHIBIT NO. B-19
3-27-19
L. Barrón, CSR



K. McLean
EXHIBIT NO. B-2D
3-27-19
L. Barrón, CSR



K. McLean
EXHIBIT NO. B-21
3-27-19
L. Barrón, CSR

EXHIBIT 4



Police Photos

ORDER #: 261720.006

CASE NAME: Williams v. Arambula

RECORDS ON: Christopher Williams

RECORDS FROM: San Diego County Sheriff's Department
9621 Ridgehaven Court
San Diego, CA 92123

**SUBSTITUTED
FOR:**

Police Photos

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number and address): Susan L. Oliver, Esquire, SBN. 160902 Tyson & Mendes 5661 La Jolla Boulevard La Jolla, CA 92037 TELEPHONE NO.: (858) 459-4400 FAX: (858) 459-3864		FOR COURT USE ONLY
ATTORNEY FOR (NAME): Defendant David Arambula		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS 1100 UNION STREET MAILING ADDRESS: 1100 UNION STREET CITY AND ZIP CODE SAN DIEGO, CA 92101 BRANCH NAME CENTRAL		
PLAINTIFF/PETITIONER: Christopher Williams DEFENDANT/RESPONDENT: David Arambula		CASE NUMBER 37-2018-00023369-CU-PO-CTL
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS		

THE PEOPLE OF THE STATE OF CALIFORNIA, TO: *The Custodian of Records for:*

San Diego County Sheriff's Department
9621 Ridgehaven Court, San Diego, CA 92123

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

TO (name of deposition office): US Legal Support Inc. ON (date)/ AT (time): 09/20/2018 9:00AM LOCATION: 20970 Warner Center Ln. Suite C, Woodland Hills, CA 91367
Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. by delivering a true, legible and durable copy of business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code Section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code Section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

SEE ATTACHMENT 3.

- Continued on Attachment 3.
- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 08/23/2018

Susan L. Oliver, Esquire /s/ Susan L. Oliver, Esquire
(TYPE OR PRINT NAME) (SIGNATURE OR PERSON ISSUING SUBPOENA)
ATTORNEY-AT-LAW
(TITLE)

(Proof of service on reverse)

ATTACHMENT 3

Williams vs. Arambula

San Diego Superior Court CASE NO. 37-2018-00023369-CU-PO-CTL

Attachment to Subpoena to San Diego Sheriff's Department:

Any and all recordings and documents relating to an incident that occurred on or about July 15, 2017, Case No. 17136885; Report No. 1716885.1, including, but not limited to, deputy reports, officer reports, call logs, dispatch records, dispatch recordings, response records, incident reports, follow-up reports, activity records, investigation reports, witness statements, interview records, photographs, transfer documents, medical treatment rendered, billing records, correspondence, notes, and any other documents and recordings regardless of format.

PLANTIFF/PETITIONER: Christopher Williams

CASE NUMBER:

DEFENDANT/RESPONDENT: David Arambula

37-2018-00023369-CU-PO-CTL

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served: **San Diego County Sheriff's Department, 9621 Ridgehaven Court
San Diego, CA 92123
Phone: 858-974-2110**
- c. Date of delivery :
- d. Time of delivery:
- a (1) Witness fees were paid.
Amount..... \$ _____
- (2) Copying fees were paid.
Amount..... \$ _____
- f. Fee for service..... \$ _____

2. I received this subpoena for service on : (date)

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number, and if applicable, county of registration and number:

**US Legal Support Inc.
20970 Warner Center Ln. Suite C
Woodland Hills, CA 91367
Phone: (818) 878-9227**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

Date:

(SIGNATURE)

(SIGNATURE)

US Legal Support Inc.

20970 Warner Center Lane, Suite C
Woodland Hills, CA 91367
Phone: (818) 878-9227 FAX: (818) 878-9851

WorkOrder#: 261720.001
CSR: Janet Zuniga

Records On: Christopher Williams DOB: 05/03/1981 SSN: XXX-XX-0753

Location: San Diego County Sheriff's Department

I. DECLARATION OF CUSTODIAN OF RECORDS

A. Description of Records Produced (REQUIRED):

Medical Records Billing Records X-Rays Other: ONE PHOTO CD
The records indicated below were requested, but do not exist:
 Medical Records Billing Records X-Rays Other: _____

B. In what manner were the records produced (REQUIRED):

Data/Computer Generated Typed/Hand Written Notes Summary Radiological
 Audio/Video Pathological Other: _____

C. Certification of Records Copied or Obtained: (REQUIRED)

The copy is a true copy of all the records described in the subpoena duces tecum or search warrant, or pursuant to subdivision (e) of Section 1560, the records were delivered to the attorney, the attorney's representative, or deposition officer for copying at the custodian's or witness' place of business, as the case may be. 1 CD

2. CERTIFICATION OF NO RECORDS

A thorough search of our files, carried out under my direction revealed no documents, records or other material called for in the Subpoena or Authorization searched by Name, SSN, DOB, etc.
 Existing records not within the time limitation set forth in the request.
 All records have been destroyed in accordance with our document retention policy which is _____ years.
 The following information does not match what we have DOB SSN NAME Other _____
 Additional information is needed such as: _____
 Other explanation: _____

3. Under penalty of perjury and under the laws of California, I the CUSTODIAN of RECORDS, declare that the foregoing is true and correct.

CUSTODIAN SIGNATURE
REQUIRED

Date: 11-06-18 City SAN DIEGO, CA, California
Print name MIKE OTIS Signed: [Signature]

(OFFICE USE ONLY) CERTIFICATION OF PROFESSIONAL PHOTOCOPIER

I, the undersigned, declare under penalty of perjury that the foregoing is true and correct:

Executed on 11/6/18 At San Diego, California
Print Name Daniel Guccola Signed [Signature]

DIEGO S

GO ST

SAN DIEGO COUNTY SHERIFF'S DEPARTMENT

EVIDENCE

Case no.: **17136885**

FIN: **2.1**

CSI:

Offense: 245 (A)(1) PC ASSAULT W/DEADLY WEAPON:NOT

Date Seized: 9/15/2018 6:19:33 AM

S/W: No

R&I:

PFIN:



* S 0 0 4 2 3 1 1 *

Sealing Official:

DB - SH6140

Date Sealed: _____

Witnessing Official: _____

Gross Weight: _____

PHOTO CD - COPY (11882456)





