

ORIGINAL

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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 INTRODUCING NEW DOCUMENTS RESPONSIVE TO DOCUMENT REQUESTS IN HIS DEPOSITION NOTICE; DECLARATION OF EMILY M. STRAUB**

*[MIL No. 20 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 introducing documents responsive to document requests accompanying plaintiff's deposition, which plaintiff did not already produce. More specifically, Mr. Arambula moves the Court from precluding plaintiff and his counsel of record from introducing new documents which:  
(a) evidence and/or depict the amounts of past and future lost earnings plaintiff seeks to recover with

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1 regard to his prospective marijuana dispensaries, and/or (b) otherwise support plaintiff's damage  
2 claims for past and future lost earnings from the prospective dispensaries.

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

6 **I. INTRODUCTION**

7 It is anticipated plaintiff and his counsel will attempt to introduce new documents during  
8 trial that are responsive to particular document requests accompanying plaintiff's deposition notice.  
9 Such tactic violates the laws governing discovery, and would otherwise subject the defense to unfair  
10 surprise and undue prejudice. Plaintiff should therefore be precluded from introducing additional  
11 documents at trial.

12 **II. AUTHORITY FOR MOTION**

13 A motion *in limine* is the appropriate method "to preclude the presentation of evidence  
14 deemed inadmissible and prejudicial by the moving party." (*Blanks v. Seyfarth Shaw, LLP* (2009)  
15 171 Cal.App.4th 336, 375.) The important purpose served by such motion is "to avoid the  
16 obviously futile attempt to "unring the bell" in the event a motion to strike is granted in the  
17 proceedings before the jury." (*Hyatt v. Sierra Boat Co.* (1978) 79 Cal.App.3d 325, 337.)

18 **III. THE DOCUMENT REQUESTS AT ISSUE**

19 Plaintiff did not produce any documents at his first volume of deposition in response to  
20 document requests accompanying his deposition notice. (*See* Declaration of Emily M. Straub  
21 ("Straub Decl.") at ¶ 4.) Mr. Arambula was forced to, and did, obtain a Court order requiring plaintiff  
22 to produce documents. (*Id.* at ¶¶ 5-6; *See* Exhibit 1 to Straub Decl. – July 1, 2019 Notice of  
23 Deposition of Plaintiff Christopher Williams (Volume II) at Exhibit A Minute Order.) Noteworthy  
24 for purposes of the instant motion are those categories of documents which: (a) evidence and/or  
25 depict the amounts of past and future lost earnings plaintiff seeks to recover with regard to his  
26 prospective marijuana dispensaries, and/or (b) otherwise support plaintiff's damage claims for past  
27 and future lost earnings from the prospective dispensaries. (*Id.* at Exhibit B, Document Request Nos.  
28 2-5.) During plaintiff's second volume of deposition, and shortly thereafter, plaintiff produced

1 documents responsive to the document requests in his original deposition notice. (See Straub Decl.  
2 at ¶¶ 8-9.) Plaintiff testified he produced documents responsive to all of the categories of document  
3 requests. (See Exhibit 2 to Straub Decl. – transcript excerpts from September 24, 2019 deposition of  
4 plaintiff, at 441:6-15, 442:1-4.)

5 **IV. THE COURT SHOULD PRECLUDE THE INTRODUCTION OF NEW**  
6 **DOCUMENTS AS A MATTER OF LAW**

7 One of the central and most important purposes of discovery is to eliminate unfair surprise  
8 at trial. (*Davies v. Superior Court* (1984) 36 Cal.3d 291, 299; *Greyhound Corp. v. Superior Court*  
9 (1961) 56 Cal.2d 355, 376.) As such, the Court has broad authority to exclude, and should exclude,  
10 evidence wrongfully withheld from disclosure during the discovery process. (*Deeter v. Angus* (1986)  
11 179 Cal.App.3d 241, 254-255; *Thoren v. Johnston* (1972) 29 Cal.App.3d 270, 273-274.)

12 Here, as discussed *supra*, plaintiff had not one, but two opportunities to produce documents  
13 responsive to the document requests accompanying his deposition notice. He was otherwise ordered  
14 to produce responsive documents by the Court. Plaintiff's production of documents at his second  
15 volume of deposition should therefore be binding on plaintiff. To allow otherwise would be in  
16 contravention of established law, and would improperly subject the defendants to unfair surprise and  
17 undue prejudice.

18 **V. CONCLUSION**

19 For all of the foregoing reasons, Mr. Arambula respectfully requests the Court grant this  
20 motion and issue and order precluding plaintiff and his counsel from introducing new documents  
21 which: (a) evidence and/or depict the amounts of past and future lost earnings plaintiff seeks to  
22 recover with regard to his prospective marijuana dispensaries, and/or (b) otherwise support  
23 plaintiff's damage claims for past and future lost earnings from the prospective dispensaries.

24 Dated: December 5, 2019

TYSON & MENDES

25  
26 By: 

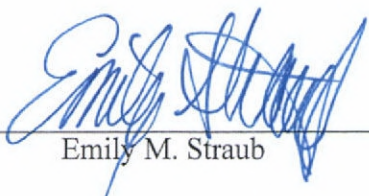
Jessica G. Heppenstall, Esq.  
Emily M. Straub, Esq.

Attorneys for Defendant DAVID ARAMBULA



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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 5<sup>th</sup> day of December, 2019, at La Jolla, California.

  
\_\_\_\_\_  
Emily M. Straub



# **EXHIBIT 1**

1 Susan L. Oliver, Esq. (Bar No. 160902)  
2 Emily M. Straub, Esq. (Bar No. 259141)  
3 TYSON & MENDES  
4 5661 La Jolla Boulevard  
5 La Jolla, CA 92037  
6 Telephone: (858) 459-4400

7 Attorneys for Defendant DAVID ARAMBULA

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

10 CHRISTOPHER WILLIAMS,

11 Plaintiff,

12 v.

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

15 Defendants.  
16

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

**NOTICE OF DEPOSITION OF  
PLAINTIFF CHRISTOPHER  
WILLIAMS (VOLUME II)**

Date: September 24, 2019  
Time: 9:00 a.m.  
Location: Peterson Reporting  
530 B Street, Suite 350  
San Diego, CA 92101

Trial Date: December 13, 2019

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20 PLEASE TAKE NOTICE that the second volume of deposition of Christopher Williams  
21 will take place beginning at 9:00 a.m. on September 24, 2019, at Peterson Reporting, located at  
22 530 B Street, Suite 350, San Diego, CA 92101, in accordance with the Court's June 14, 2019  
23 rulings on the defendants' discovery motions, a copy of which is attached hereto as Exhibit A. The  
24 deposition will continue from day to day, Saturdays, Sundays, and holidays excepted, until  
25 completed.

26 In accordance with *Code Civil Procedure* § 2025.220, please take notice the deposition  
27 may be recorded by audio and/or video technology, in addition to being recorded by stenographic  
28 method. Notice is further given, pursuant to *Code Civil Procedure* §§ 2025.220 and 2025.620, that





1 Mr. Arambula reserves all rights to use audio and/or video recordings of the deposition testimony  
2 at trial.

3 PLEASE TAKE FURTHER NOTICE that Mr. Williams is required to produce, at the time  
4 of his deposition, pursuant to *Code of Civil Procedure* § 2025.280 and the Court's June 14, 2019  
5 rulings on the defendants' discovery motions, the documents and material referenced in the  
6 document requests accompanying Mr. Arambula's fourth amended notice of deposition of Mr.  
7 Williams and request for production of documents. A copy of said deposition notice is attached  
8 hereto as Exhibit B.

9  
10 Dated: July 1, 2019

TYSON & MENDES LLP

11  
12 By: 

Susan L. Oliver  
Emily M. Straub

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14 Attorneys for Defendant DAVID ARAMBULA  
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# **EXHIBIT A**

SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF SAN DIEGO  
CENTRAL

MINUTE ORDER

DATE: 06/14/2019

TIME: 10:30:00 AM

DEPT: C-68

JUDICIAL OFFICER PRESIDING: Richard S. Whitney

CLERK: Richard Cersosimo

REPORTER/ERM: Not Reported

BAILIFF/COURT ATTENDANT: Henry Whatley

CASE NO: 37-2018-00023369-CU-PO-CTL CASE INIT.DATE: 05/11/2018

CASE TITLE: Christopher Williams vs David Arambula [IMAGED]

CASE CATEGORY: Civil - Unlimited CASE TYPE: Pt/PD/WD - Other

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EVENT TYPE: Discovery Hearing

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EVENT TYPE: Discovery Hearing

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**APPEARANCES**

Nora Pasin, specially appearing for counsel Cory J Briggs, present for Plaintiff(s).

Emily Straub, counsel, present for Defendant(s).

Nathaniel Micheis, specially appearing for counsel Kimberly S Oberrecht, present for Defendant(s).

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The Court hears argument on 1) Defendant City of Lemon Grove's motion for waiver of time limit for the deposition of Plaintiff, and 2) Defendant David Arambula's motion to compel Plaintiff Christopher Williams to answer deposition questions and produce documents, and to request relief from the seven-hour deposition rule.

The Court CONFIRMS and MODIFIES the tentative ruling as follows:

**(1) Defendant CITY OF LEMON GROVE's UNOPPOSED Motion for Waiver of Time Limit for the Deposition of Plaintiff is GRANTED.**

Plaintiff agrees to submit to approximately three hours of question at a further deposition. The motion is granted.

**(2) Defendant David Arambula's Motion to Compel Plaintiff Christopher Williams to Answer Deposition Questions and Produce Documents, and to Request Relief from the Seven-Hour Deposition Rule is GRANTED.**

Plaintiff's counsel signed a stipulation proposed by Defendant Arambula, after crossing out paragraph

two as to waiving any and alleged damages related to the marijuana dispensary applications. The parties were and remain in agreement as to not calling Defendant Arambula's two daughters as witnesses at trial and not revealing their identities. Because Defendant Arambula took an all-of-nothing approach, there is no stipulation between the parties. Plaintiff has not presented any legally justifiable reason to withhold the identities of his daughters. Plaintiff is ordered to answer questions regarding his daughters, unless the parties submit a stipulation regarding this issue.

The Court may permit additional time beyond the seven-hour limit under CCP section 2025.290(a). The parties previously agreed Plaintiff would appear for a further deposition for up to two hours beyond the limit. The Court finds this to be reasonable. Plaintiff is ordered to appear for a further deposition for up to two hours beyond the seven-hour limit under CCP section 2025.290(a).

Plaintiff has not justified his failure to produce documents and his counsel's instructions to Plaintiff to not answer questions regarding his permit applications and business plans. That the Court discussed the issue in denying the motion for summary judgment is of no consequence. The motion for summary judgment does not determine any issue in the case. (*Schulze v. Schulze* (1953) 121 Cal.App.2d 75, 83.)

The issues in this motion could have been narrowed had the parties agreed to alter the stipulation. Defendant Arambula did not need to take an all-of-nothing approach. Plaintiff is partially justified as to the issue of his daughters because the parties agreed and continue to agree on the issue. However, Plaintiff has not demonstrated substantial justification as to producing documents or answering questions as to the permit applications and business plans. Defendant Arambula is awarded \$250 in sanctions against Plaintiff and his counsel, jointly. The Court orders sanctions to paid within 30 days.

# EXHIBIT B

1 Susan L. Oliver, Esq. (Bar No. 160902)  
Emily M. Straub, Esq. (Bar No. 259141)  
2 TYSON & MENDES  
5661 La Jolla Boulevard  
3 La Jolla, CA 92037  
Telephone: (858) 459-4400

4 Attorneys for Defendant DAVID ARAMBULA

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6  
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 COUNTY OF SAN DIEGO – HALL OF JUSTICE  
9

10 CHRISTOPHER WILLIAMS,

11 Plaintiff,

12 v.

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

15  
16 Defendants.  
17

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

**FOURTH AMENDED NOTICE OF  
DEPOSITION OF PLAINTIFF  
CHRISTOPHER WILLIAMS AND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

Date: January 8, 2019  
Time: 9:00 a.m.  
Location: Peterson Reporting  
530 B Street, Suite 350  
San Diego, CA 92101

Trial Date: Not Set

18  
19  
20 PLEASE TAKE NOTICE that Defendant David Arambula will take the deposition of  
21 Plaintiff Christopher Williams, beginning at 9:00 a.m. on January 8, 2019, at Peterson Reporting,  
22 located at 530 B Street, Suite 350, San Diego, CA 92101. The deposition will continue from day to  
23 day, Saturdays, Sundays, and holidays excepted, until completed.

24 In accordance with *Code Civil Procedure* § 2025.220, please take notice the deposition  
25 may be recorded by audio and/or video technology, in addition to being recorded by stenographic  
26 method. Notice is further given, pursuant to *Code Civil Procedure* §§ 2025.220 and 2025.620, that  
27 Mr. Arambula reserves all rights to use audio and/or video recordings of the deposition testimony  
28 at trial.







- 1           11. Any and all DOCUMENTS depicting communications between YOU and Taisha  
2 Brown concerning YOUR APPLICATIONS.
- 3           12. Any and all DOCUMENTS depicting communications between YOU and Taisha  
4 Brown concerning the INCIDENT.
- 5           13. Any and all DOCUMENTS depicting communications between YOU and Taisha  
6 Brown concerning the MEETING.
- 7           14. Any and all DOCUMENTS depicting communications between YOU and anyone  
8 other than YOUR attorney regarding the INCIDENT.
- 9           15. Any and all DOCUMENTS depicting communications between YOU and anyone  
10 other than YOUR attorney regarding the MEETING.
- 11          16. Any and all DOCUMENTS depicting communications between YOU and anyone  
12 other than YOUR attorney regarding the APPLICATIONS.
- 13          17. Any and all DOCUMENTS depicting communications between YOU and anyone  
14 other than YOUR attorney regarding Mr. Arambula.
- 15          18. Any and all DOCUMENTS depicting communications between any PERSONS  
16 (excluding YOU) concerning the APPLICATIONS, excluding communications between YOU  
17 and YOUR attorney, that are in YOUR possession, custody, and/or control.
- 18          19. Any and all DOCUMENTS depicting communications between any PERSONS  
19 (excluding YOU) concerning the INCIDENT, excluding communications between YOU and  
20 YOUR attorney, that are in YOUR possession, custody, and/or control.
- 21          20. Any and all DOCUMENTS depicting communications between any PERSONS  
22 (excluding YOU) concerning the MEETING, excluding communications between YOU and  
23 YOUR attorney, that are in YOUR possession, custody, and/or control.
- 24          21. Any and all DOCUMENTS that support YOUR claims against Mr. Arambula in  
25 the above-captioned lawsuit.
- 26          22. Any and all DOCUMENTS that support YOUR claims against the City of Lemon  
27 Grove in the above-captioned matter.
- 28        ///

1           23. Any and all DOCUMENTS evidencing any and all licenses issued to Pick Axe  
2 Holdings, LLC, by the State of California, for the operation of marijuana dispensaries in the State  
3 of California.

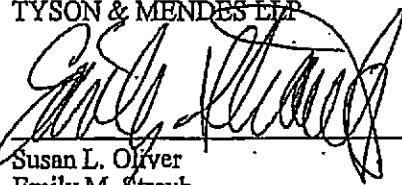
4           24. Any and all DOCUMENTS evidencing any and all licenses issued to YOU, by the  
5 State of California, for the operation of marijuana dispensaries in the State of California.

6           25. Any and all DOCUMENTS evidencing any and all business licenses issued to  
7 Pick Axe Holdings, LLC, by the City of Lemon Grove, for the operation of marijuana  
8 dispensaries in the City of Lemon Grove.

9           26. Any and all DOCUMENTS evidencing any and all business licenses issued to  
10 YOU, by the City of Lemon Grove, for the operation of marijuana dispensaries in the City of  
11 Lemon Grove.

12  
13 Dated: December 3, 2018

TYSON & MENDES LLP

14  
15 By:   
16 Susan L. Oliver  
17 Emily M. Straub  
18 Attorneys for Defendant DAVID ARAMBULA

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**PROOF OF SERVICE**

I, the undersigned, declare that I am over the age of 18 years and not a party to the within action or proceeding. I am employed in and am a resident of San Diego County where the mailing occurs; and my business address is 5661 La Jolla Blvd, La Jolla, CA. 92037.

On December 3, 2018, I caused to be served the following document(s):

**FOURTH AMENDED NOTICE OF DEPOSITION OF PLAINTIFF  
CHRISTOPHER WILLIAMS AND REQUEST FOR PRODUCTION OF  
DOCUMENTS**

on the interested parties in this action by:

X **BY MAIL:** I further declare that I am readily familiar with the firm's business practice of collection and processing of correspondence for mailing with the United States Postal Service, and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business pursuant to Code of Civil Procedure section 1013(a). I then sealed each envelope and, with postage thereon fully prepaid, placed each for deposit in the United States Postal Service, this same day, at my business address shown above, following ordinary business practices.

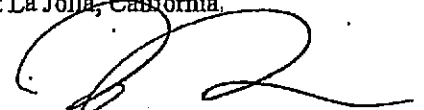
Cory J. Briggs, Esq.  
Anthony N. Kim, Esq.  
Briggs Law Corporation  
99 East C Street, Suite 111  
Upland, CA 91786  
T: 909-949-7115  
*Attorney for Plaintiff Christopher Williams*

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Heidi K. Williams, Esq.  
Horton, Oberrecht, Kirkpatrick & Martha  
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San Diego, California 92101  
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F: 619-696-5719  
E: [koberrecht@hortonfirm.com](mailto:koberrecht@hortonfirm.com)  
[hwilliams@hortonfirm.com](mailto:hwilliams@hortonfirm.com)  
*Attorney for Defendant City of Lemon Grove*

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Shawn M. Robinson, Esq.  
Kristen S. Steinke, Esq.  
Lounsbury Ferguson-Altona & Peak  
960 Canterbury Place, Suite 300  
Escondido, CA 92025  
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F: 760-743-9926  
E: [smra@lfap.com](mailto:smra@lfap.com)  
*Attorney for Defendant City of Lemon Grove*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on December 3, 2018, at La Jolla, California.

  
\_\_\_\_\_  
Theresa Owens

1 Susan L. Oliver, Esq. (Bar No. 160902)  
Emily M. Straub, Esq. (Bar No. 259141)  
2 TYSON & MENDES  
3 5661 La Jolla Boulevard  
La Jolla, CA 92037  
4 Telephone: (858) 459-4400

5 Attorneys for Defendant, DAVID ARAMBULA  
6  
7

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

10 CHRISTOPHER WILLIAMS, ) Case No. 37-2018-00023369-CU-PO-CTL  
11 ) [Complaint Filed: May 11, 2018]  
12 Plaintiff, )  
13 vs. )  
14 ) **PROOF OF SERVICE**  
15 DAVID ARAMBULA; CITY OF LEMON )  
GROVE; and DOES 1 through 1,000, )  
16 Defendants. ) Judge: Hon. Judith F. Hayes  
17 ) Dept: C-68  
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19 ) Trial: December 13, 2019  
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**PROOF OF SERVICE**

I, the undersigned, declare that I am over the age of 18 years and not a party to the within action or proceeding. I am employed in and am a resident of San Diego County where the mailing occurs; and my business address is 5661 La Jolla Blvd, La Jolla, CA 92037.

On July 1, 2019, I caused to be served the following document(s):  
**NOTICE OF DEPOSITION OF PLAINTIFF CHRISTOPHER WILLIAMS  
(VOLUME II)**

on the interested parties in this action by:

**X** **BY MAIL:** I further declare that I am readily familiar with the firm's business practice of collection and processing of correspondence for mailing with the United States Postal Service, and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business pursuant to Code of Civil Procedure section 1013(a). I then sealed each envelope and, with postage thereon fully prepaid, placed each for deposit in the United States Postal Service, this same day, at my business address shown above, following ordinary business practices.

**SERVICE LIST**

Cory J. Briggs, Esq. Anthony N. Kim, Esq. Briggs Law Corporation 99 East C Street, Suite 111 Upland, CA 91786 <i>Attorney for Plaintiff Christopher Williams</i>	Kimberly S. Oberrecht, Esq. Nathaniel J. Michels, Esq. Horton, Oberrecht, Kirkpatrick & Martha 101 W. Broadway, Suite 600 San Diego, California 92101 <i>Attorney for Defendant City of Lemon Grove</i>
Shawn M. Robinson, Esq. Kristen S. Steinke, Esq. Lounsbery Ferguson Altona & Peak 960 Canterbury Place, Suite 300 Escondido, CA 92025 <i>Attorney for Defendant City of Lemon Grove</i>	

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 1, 2019, at La Jolla, California.



Theresa Belchere





# **EXHIBIT 2**

Christopher Williams, Volume 2 9/24/2019

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
2 COUNTY OF SAN DIEGO-HALL OF JUSTICE  
3  
4 CHRISTOPHER WILLIAMS, ) Case No.  
5 ) 37-2018-00023369  
6 Plaintiff, ) CU-PO-CTL  
7 v. )  
8 DAVID ARAMBULA, CITY OF )  
9 LEMON GROVE, and DOES 1 )  
10 through 1,000, )  
11 Defendants. )  
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VIDEOTAPED DEPOSITION OF CHRISTOPHER WILLIAMS

San Diego, California

September 24, 2019

VOLUME II

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

1 Q. So did you review this document, sir,  
2 prior to today's deposition?

3 A. I did not review it. I skimmed over it.

4 Q. Okay. Now when we met last, we spent a  
5 lot of time going over the Exhibit B to this  
6 document which was your forth amended notice of  
7 deposition and request for production of  
8 documents. I will represent to you that's the  
9 same document that we previously marked as  
10 probably Exhibit 1 to your prior volume. Now in  
11 all the document requests that you see here there  
12 are 26, were you able to produce documents today  
13 that are responsive to all of these document  
14 categories?

15 A. Yes. I believe I did. I do believe  
16 that from 22 to 26 that after discussions with my  
17 attorney --

18 MR. BRIGGS: Hang on. Hang on. Hang  
19 on. Don't -- answer her question. Did you look  
20 for documents; yes or no?

21 A. Yes.

22 BY MS. STRAUB:

23 Q. So my question was did you produce  
24 documents that are responsive --

25 A. Yes.

1 Q. Wait a minute, sorry. Did you produce  
2 documents that are responsive to all of these  
3 document categories?

4 A. I apologize. Yes.

5 Q. Thank you. Just for clarity, we don't  
6 ever want to know about conversations you had with  
7 Corey or Nora or any other attorneys or people  
8 from their office just because that's privilege.  
9 Okay?

10 A. Okay.

11 Q. We'll take a peek at those documents  
12 later on. We talked about medical treatment.  
13 Let's jump back to the incident. And by incident  
14 I am referring to the physical altercation between  
15 you and Mr. Arambula. All right?

16 A. I still need this?

17 Q. No, we're good. Sorry. Do you recall  
18 what type of flooring was in place in the area  
19 where the altercation took place? By that I mean  
20 was it wood, linoleum?

21 A. I believe it's laminate.

22 Q. Do you recall if any portion of your  
23 head hit the ground during the course of the  
24 incident?

25 A. I do not recall.

Christopher Williams, Volume 2 9/24/2019

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

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4 I, Bobbie Hibbler, Certified Shorthand  
Reporter, in and for the State of California,  
5 Certificate No. 12475, do hereby certify:

6 That the witness in the foregoing  
deposition was by me first duly sworn to testify  
7 to the truth, the whole truth, and nothing but the  
truth in the foregoing cause; that the deposition  
8 was then reported by me in shorthand and  
transcribed, through computer-aided transcription,  
9 under my direction; and that the above and  
foregoing transcript, is a true record of the  
10 testimony elicited and proceedings had at said  
deposition.

11

I do further certify that I am a  
12 disinterested person and am in no way interested  
in the outcome of this action or connection with  
13 or related to any of the parties in this action or  
to their respective counsel.

14

15 In witness whereof, I have hereunto  
set my hand this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

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19 Bobbie Hibbler, CSR No. 12475

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Christopher Williams, Volume 2 9/24/2019

1 Declaration Under Penalty of Perjury

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4 I, CHRISTOPHER WILLIAMS, the witness herein,  
5 declare under penalty of perjury that I have read  
6 the foregoing in its entirety; and that the  
7 testimony contained therein, as corrected by me,  
8 is a true and accurate transcription of my  
9 testimony elicited at said time and place.

10

11 Executed this \_\_\_\_ day of \_\_\_\_ 20\_\_, at

12 \_\_\_\_\_,

13 (City)

(state)

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CHRISTOPHER WILLIAMS

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