

ORIGINAL

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**FILED**  
Clerk of the Superior Court

DEC - 6 2019

5 Attorneys for Defendant DAVID ARAMBULA

By: R. Cersosimo, Clerk

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

11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 v.

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

17 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  
MENTIONING, QUESTIONING, OR  
PRESENTING TESTIMONY THAT  
DAVID ARAMBULA HAS PTSD;  
DECLARATION OF EMILY M. STRAUB**

[MIL No. 21 of 22]

Trial Date: December 13, 2019

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

22 PLEASE TAKE NOTICE that Defendant David Arambula hereby moves the Court, on  
23 behalf of the defense, for an order precluding Plaintiff Christopher Williams and his counsel of  
24 record from mentioning, questioning, or otherwise presenting testimony that Mr. Arambula has Post  
25 Traumatic Stress Disorder ("PTSD").

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

**FILED**

1 **I. INTRODUCTION**

2 It is anticipated (a) plaintiff will testify he believes Mr. Arambula has PTSD, and  
3 (b) plaintiff's counsel will attempt to elicit testimony from various other party and non-party  
4 witnesses bearing on the topic of whether Mr. Arambula has PTSD. The purpose? To improperly  
5 influence the jurors into believing Mr. Arambula committed assault and battery because he has a  
6 propensity for violence. This would mislead the jury and otherwise be unduly prejudicial to the  
7 defense. Furthermore, there is no admissible evidence to support plaintiff's allegation Mr.  
8 Arambula has PTSD – only hearsay and unfounded speculation. Even if there were admissible  
9 evidence establishing Mr. Arambula had PTSD, it would nevertheless be irrelevant and  
10 inadmissible, because such evidence cannot be used to prove Mr. Arambula committed assault or  
11 battery. For all of these reasons, plaintiff and his counsel must be precluded from mentioning,  
12 questioning, or otherwise presenting testimony that Mr. Arambula has PTSD.

13 **II. AUTHORITY FOR MOTION**

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

19 **III. PERTINENT DEPOSITION TESTIMONY**

20 Plaintiff testified Mr. Arambula told him he has PTSD – unfounded hearsay. (Ex. 1 to  
21 Declaration of Emily M. Straub (“Straub Decl.”) at 263:11-19.) The deputy sheriff who responded  
22 to the emergency room following the subject physical altercation testified plaintiff told her Mr.  
23 Arambula told plaintiff he had PTSD – unfounded double hearsay. (Ex. 2 to Straub Decl. at 24:22-  
24 25:8.) Then we have the testimony of Mr. Arambula. Mr. Arambula’s testimony confirms he does  
25 not have PTSD. (Ex. 3 to Straub Decl. at 34:13-24.) There is otherwise no evidence of a medical  
26 diagnosis of PTSD. Neither Mr. Arambula’s testimony nor the lack of medical evidence was  
27 apparently enough to end the inquiry. Indeed, plaintiff’s counsel questioned multiple third-party  
28

1 witnesses about whether they knew of Mr. Arambula being diagnosed with PTSD, or otherwise  
2 heard he had PTSD. (Ex. 4 to Straub Decl. at 87:5-18; Exhibit 5 to Straub Decl. at 41:4-6.)  
3

4 **IV. TESTIMONY CONCERNING MR. ARAMBULA'S ALLEGED PTSD IS**  
5 **INADMISSIBLE BECAUSE IT LACKS FOUNDATION AND IS HEARSAY**

6 The proponent of evidence must lay adequate foundation for that evidence, otherwise it is  
7 inadmissible. (Evid. Code § 403; see, e.g., *People v. Fortin* (2017) Cal.App.5th 524, 534 (court  
8 excludes testimony evidence because it lacks foundation).) Even with foundation, if the proffered  
9 evidence is hearsay (i.e., an out of court statement offered to prove the truth of the matters  
10 asserted), it is not admissible absent an exception to the hearsay rule. (Evid. Code § 1200;  
11 *Kulshrestha v. First Union Commercial Corp.* (2004) 33 Cal.4th 601, 609.)

12 While plaintiff may believe Mr. Arambula has PTSD, there is no credible foundation to  
13 support this belief. There is no medical diagnosis or other evidence establishing Mr. Arambula has  
14 PTSD. It is pure speculation on plaintiff's part, founded upon nothing more than his allegation Mr.  
15 Arambula told him this. And, importantly, what plaintiff alleges Mr. Arambula told him, and what  
16 other people testified to with regard what they heard from plaintiff or someone else, is hearsay. There  
17 is no applicable exception to the hearsay rule here. None of the aforementioned testimony should  
18 therefore be admissible during trial. For the same reasons, plaintiff's counsel should be precluded  
19 from commenting on or questioning any witnesses regarding the subject of whether Mr. Arambula  
20 has PTSD.

21 **V. TESTIMONY CONCERNING MR. ARAMBULA'S ALLEGED PTSD IS**  
22 **INADMISSIBLE BECAUSE PLAINTIFF CANNOT USE CHARACTER**  
23 **EVIDENCE TO PROVE CONDUCT OR PROPENSITY**

24 Testimony evidence or other evidence regarding a defendant's character and/or character  
25 traits cannot be used to establish (a) the defendant engaged conduct, and/or (b) had the propensity  
26 to engage in such conduct. (Evid. Code § 1101(a); *Holdgrafer v. Unocal Corp.* (2008) 160  
27 Cal.App.4th 907, 928; *People v. Jackson* (2016) 1 Cal.5th 269, 299.)

28 Here, plaintiff and his counsel hope to demonstrate Mr. Arambula has PTSD in an effort

1 to show Mr. Arambula's disposition caused him to commit assault and battery. Even if Mr.  
2 Arambula had PTSD, which he does not, such condition would be character evidence plaintiff  
3 cannot use to prove Mr. Arambula committed assault or battery. This is yet another reason why  
4 plaintiff and his counsel should be precluded from mentioning, questioning, or otherwise  
5 presenting testimony that Mr. Arambula has PTSD.

6 **VI. TESTIMONY CONCERNING MR. ARAMBULA'S ALLEGED PTSD IS**  
7 **INADMISSIBLE BECAUSE IT IS NOT RELEVANT**

8 Evidence is not admissible unless it is relevant. (Evid. Code § 350.) Relevant evidence is  
9 evidence "having any tendency in reason to prove or disprove any disputed fact that is of  
10 consequence to the determination of the action." (Evid. Code § 210.) The test of relevance is  
11 whether the evidence tends "logically, naturally and by reasonable inference" to establish material  
12 facts. (*People v. Wilson* (2006) 38 Cal.4th 1237, 1245.)

13 Whether Mr. Arambula has PTSD has no bearing on any fact of consequence in this  
14 lawsuit. As discussed in the immediately preceding section of this motion, plaintiff cannot use  
15 PTSD evidence to prove Mr. Arambula committed assault or battery. There is not otherwise any  
16 fact of consequence such evidence could be used to prove or disprove in this matter. Plaintiff and  
17 his counsel should therefore be precluded from mentioning and/or offering testimony concerning  
18 this topic because it is not relevant.

19 **VII. TESTIMONY CONCERNING MR. ARAMBULA'S ALLEGED PTSD IS**  
20 **INADMISSIBLE BECAUSE IT IS UNDULY PREJUDICIAL AND WOULD**  
21 **MISLEAD THE JURY**

22 Evidence Code Section 352 provides:

23 The court, in its discretion, may exclude if its probative value is  
24 substantially outweighed by the probability that its admission will  
25 (a) necessitate undue consumption of time or (b) create substantial  
26 danger of undue prejudice, of confusing the issues, or of misleading  
the jury.

27 The term "prejudicial" means "evoking an emotional response that has very little to do with the issue  
28 on which the evidence is offered." (*Rufo v. Simpson* (2001) 86 Cal.App.4th 573, 597.) Importantly:

1 [E]vidence should be excluded as unduly prejudicial when it is of such  
2 nature as to inflame the emotions of the jury, motivating them to use  
3 the information, not to logically evaluate the point upon which it is  
4 relevant, but to reward or punish one side because of the jurors'  
5 emotional reaction. In such a circumstance, the evidence is unduly  
prejudicial because of the substantial likelihood the jury will use it for  
an illegitimate purpose.

6 (*People v. Branch* (2001) 91 Cal.App.4th 274, 286 (quoting *Vorse v. Sarasy* (1997) 53 Cal.App.4th  
7 998, 1008-1009 (internal quotation marks omitted).)

8 Here, as discussed *supra*, the topic of whether Mr. Arambula has PTSD is not relevant. As  
9 such, it has no probative value to this case. Moreover, it would be unduly prejudicial to Mr.  
10 Arambula's defense if plaintiff and his counsel were able to present testimony suggesting Mr.  
11 Arambula has PTSD. Such testimony could improperly lead the jury to believe Mr. Arambula is a  
12 "loaded gun" with little to no control over his emotions. Such preconception could therefore  
13 influence a determination it is more likely than not Mr. Arambula committed assault and/or  
14 battery. Accordingly, plaintiff and his counsel must be precluded from tainting the jurors' minds  
15 in this regard.

16 **VIII. CONCLUSION**

17 For all of the foregoing reasons, Mr. Arambula respectfully requests the Court grant this  
18 motion and issue and order precluding plaintiff and his counsel from mentioning, questioning, and/or  
19 presenting testimony that Mr. Arambula has PTSD.

20  
21 Dated: December 6, 2019

TYSON & MENDES

22  
23  
24 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 transcript excerpts from the January 8, 2019 deposition of Christopher Williams.

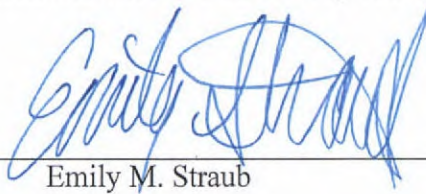
5. Attached hereto as Exhibit 2 is a true and correct copy of transcript excerpts from the April 19, 2019 deposition of Deputy Sheriff Deborah Stiesmeyer.

6. Attached hereto as Exhibit 3 is a true and correct copy of transcript excerpts from the October 26, 2018 deposition of David Arambula.

7. Attached hereto as Exhibit 4 is a true and correct copy of transcript excerpts from the August 26, 2019 deposition of Dorinna Hirsch.

8. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from the October 22, 2019 deposition of Alma Velasquez.

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



Emily M. Straub



# **EXHIBIT 1**



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

CHRISTOPHER WILLIAMS,	)	Case No.
	)	37-2018-00023369
	)	CU-PO-CTL
Plaintiff,	)	
	)	
v.	)	
	)	
DAVID ARAMBULA, CITY OF	)	
LEMON GROVE, and DOES 1	)	
through 1,000,	)	
	)	
Defendants.	)	

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VIDEOTAPED DEPOSITION OF CHRISTOPHER WILLIAMS  
San Diego, California  
January 8, 2019  
VOLUME 1

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

1 day you indicated more photos were taken. Was  
2 that also with a telephone or her phone?

3 A. Yes.

4 Q. Do you know approximately how many  
5 photographs Kathleen took of your injuries?

6 A. No.

7 Q. Can you give me your best estimate?

8 A. Ten to fifty.

9 Q. Ten to fifty?

10 A. Yeah.

11 Q. So when you were talking to the sheriff  
12 did you indicate to her why you did not want to  
13 share more details about the physical altercation  
14 with Mr. Arambula?

15 A. I did.

16 Q. What did you share with her?

17 A. That it was a council member who told me  
18 he had a PTSD and was dying of cancer. I didn't  
19 want to get him in trouble.

20 Q. You didn't want to get him in trouble?

21 A. Uh-huh (affirmative response).

22 Q. Did you mention anything about your  
23 fears that you were discussing before about --

24 A. Yeah.

25 Q. What did you say specifically about your

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

12 I do further certify that I am a  
disinterested person and am in no way interested  
13 in the outcome of this action or connection with  
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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Bobbie Hibbler, CSR No. 12475

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Christopher Williams, 1/8/2019

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.

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Executed this 15 day of Feb 2019, at

San Diego

, CA

(city)

(state)



CHRISTOPHER WILLIAMS

# C E R T I F I C A T E

I, the undersigned, do hereby certify that I have read the foregoing deposition and that, to the best of my knowledge, said deposition is true and accurate (with the exception of the following changes listed below).

PAGE No.	LINE No.	
211	10	I cannot recall if I was kicked
222	4	One forearm over the other
234	24	Kathleen's parents and sisters were not at my home when I arrived, they had already left to the hotel. The family was at my home when I left for the meeting and at my home in the morning when I woke up.
		<del>_____</del>
		<del>_____</del>
239	8	Jill went back to the hotel. Kathleen and Mac were the only two awake
254	20	Joanna Cary
		_____
		_____
		_____
		_____

Please turn to back of transcript and  
sign the Penalty of Perjury page.



# **EXHIBIT 2**

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO, EAST COUNTY DIVISION

CHRISTOPHER WILLIAMS,	)	
	)	
Plaintiff,	)	Case No.:
	)	37-2018-00023369-
vs.	)	CU-PO-CTL
	)	
DAVID ARAMBULA; CITY OF LEMON	)	
GROVE; and DOES 1 through	)	
1,000,	)	
	)	
Defendants.	)	

DEPOSITION OF DEPUTY SHERIFF DEBORAH STIESMEYER

La Mesa, California

April 19, 2019

REPORTED BY HEIDI J. JOHNSON, RPR, CSR NO. 12525



1 Q Did he give you any reason about not wanting  
2 to get that person in trouble?

3 A Just that they were an elected official with  
4 the City of Lemon Grove, possibly suffering from PTSD.

5 Q Did you ask Mr. Williams if he wanted to press  
6 charges?

7 A I did.

8 Q What did he say?

9 A That he did not want to cooperate with the  
10 court process.

11 Q Did you encourage him to press charges?

12 A I encouraged him, if he wanted to go forward,  
13 to provide as much information as possible because of  
14 all the injuries on him, the physical injuries. And he  
15 did not want to.

16 Q Okay.

17 A But not to press charges just to give more  
18 information to have a thorough report. I can't  
19 encourage somebody to press charges or not to press  
20 charges just to give me more information to generate an  
21 accurate depiction of what happened.

22 Q Very good.

23 Let's look at the bottom of page 4. It's  
24 pretty much the last sentence there. It says, "Williams  
25 said the suspect was an elected official suffering from

1 PTSD, and he did not want to get him or her in trouble  
2 or jeopardize their job."

3 Do you see that?

4 A I do.

5 Q Okay. Does that go to what you were speaking  
6 about before, not wanting to get this elected official  
7 in trouble?

8 A Correct.

9 Q Okay. Did you find this statement to be odd?

10 A I did.

11 Q What led you to feel it was odd?

12 A That it was an elected official at this  
13 function, who, typically, elected officials are somebody  
14 in -- you're held at a higher standard to not act that  
15 way.

16 So I prompted more questions, that it's not  
17 right. Even if you are an elected official, you're  
18 still held to the laws, and you can't violate those and  
19 harm somebody. So it would be helpful to get that  
20 information. And that was not provided to me.

21 Q Okay. How about, you know, just not wanting  
22 to get someone in trouble who's inflicted physical  
23 injuries, supposedly? Do you find that to be odd?

24 A I do.

25 Q What makes you feel that's a little bit odd?







# **EXHIBIT 3**

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

CHRISTOPHER WILLIAMS,	)	Case No.
	)	37-2018-00023369
	)	CU-PO-CTL
Plaintiff,	)	
	)	
v.	)	
	)	
DAVID ARAMBULA, CITY OF	)	
LEMON GROVE, and DOES 1	)	
through 1,000,	)	
	)	
	)	
Defendants.	)	

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VIDEOTAPED DEPOSITION OF DAVID ARAMBULA  
San Diego, California  
October 26, 2018

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

1 A. No. I'm not aware.

2 Q. Is it fair to say that your weight has  
3 been roughly the same since then?

4 A. Yes. That's fair to say.

5 Q. Okay. Ever in the military?

6 A. I was.

7 Q. You ever have any training in self  
8 defense?

9 A. Yes.

10 Q. Ever have any training in hand-to-hand  
11 combat?

12 A. Yes.

13 Q. Do you have any medical conditions that  
14 would -- that may have influenced your decision to  
15 get in a fight with my client?

16 MS. STRAUB: Vague and ambiguous. Calls  
17 for an expert opinion. Calls for a legal  
18 conclusion. Calls to invade this witness'  
19 privacy.

20 BY MR. BRIGGS:

21 Q. You can answer.

22 A. No, I don't.

23 Q. Okay. You don't have PTSD, do you?

24 A. I do not.

25 Q. Have you ever been accused of



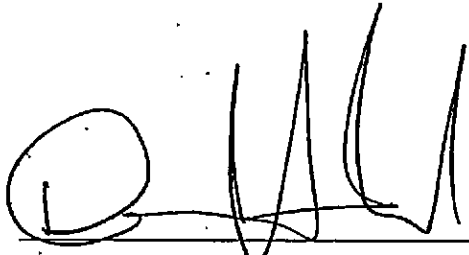
David Arambula, 10/26/2018

1 Declaration Under Penalty of Perjury

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3  
4 I, <sup>Arambula</sup> ~~DAVID ARAMBULA~~, 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.

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11 Executed this 10th day of December 2018, at  
12 Lemon Grove, California.  
13 (City) (state)

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DAVID ARAMBULA



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.

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

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Bobbie Hibbler, CSR No. 12475

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# **EXHIBIT 4**

Dorinna Hirsch 8/26/2019

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

CHRISTOPHER WILLIAMS, )  
 )  
Plaintiff, )  
 ) Case No.:  
vs. ) 37-2018-000233  
 ) 69-CU-PO-CTL  
DAVID ARAMBULA, et al., )  
 )  
Defendants. )  
\_\_\_\_\_ )

DEPOSITION OF DORINNA ELYSE HIRSCH, ESQ.  
SAN DIEGO, CALIFORNIA  
MONDAY, AUGUST 26, 2019

Reported by: Jeannette M. Kinikin, CSR  
License No. 11272

1 Q. All right.

2 A. And as far as I know, a couple years ago, she was  
3 transferred from El Cajon here to the financial crimes  
4 department or division.

5 Q. Okay. Did David ever tell you he has PTSD?

6 A. Did David ever tell me he has P -- I -- I mean, I  
7 know I've heard that. I don't know if I've heard it  
8 from -- from -- from -- from Patty or from David and  
9 his -- yeah. David and his -- and his ranting, ramblings  
10 of drunk, I --

11 Q. Are you guessing right now or do you know for  
12 certain that he told you this?

13 A. I'm trying to remember.

14 Q. And it's okay if you can't remember.

15 A. I can't remember.

16 Q. Okay.

17 A. I don't know. I don't know where I've heard  
18 that. I've heard it. I just don't know from where.

19 Q. And approximately what year did David first  
20 exhibit any behavior that made you feel threatened?

21 A. In approximately what year?

22 Q. Mm-hmm. I know -- I know we don't like the dates  
23 and numbers.

24 MR. BRIGGS: Objection. Trick question for this  
25 witness.

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DECLARATION UNDER PENALTY OF PERJURY

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

Executed at \_\_\_\_\_, California,  
on \_\_\_\_\_.

\_\_\_\_\_  
DORINNA ELYSE HIRSCH, ESQ.



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REPORTER'S CERTIFICATE

I, Jeannette M. Kinikin, CSR 11272, do hereby declare:

That, prior to being examined, the witness named in the foregoing deposition was by me duly sworn pursuant to Section 2093(b) and 2094 of the Code of Civil Procedure;

That said deposition was taken down by me in shorthand at the time and place therein named and thereafter reduced to text under my direction.

I further declare that I have no interest in the event of the action.

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

The dismantling, unsealing, or unbinding of the original transcript will render the Reporter's Certificate null and void.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of September, 2019.

\_\_\_\_\_  
Jeannette M. Kinikin, CSR  
Certificate No. 11272

# **EXHIBIT 5**

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO, EAST COUNTY DIVISION

CHRISTOPHER WILLIAMS,	)	
Plaintiff,	)	Case No.:
vs.	)	37-2018-00023369-
DAVID ARAMBULA; CITY OF LEMON	)	CU-PO-CTL
GROVE; and DOES 1 through	)	
1,000,	)	
Defendants.	)	
	)	

VIDEOTAPED DEPOSITION OF ALMA VELASQUEZ

San Diego, California

October 22, 2019

REPORTED BY HEIDI J. JOHNSON, RPR, CSR NO. 12525

1 Q Okay. Do you know whether he was -- he ever  
2 saw combat?

3 A No, I do not.

4 Q Okay. Do you know whether he has ever been  
5 diagnosed with PTSD?

6 A Not that I know of.

7 Q Okay. Have you ever seen Mr. Arambula get  
8 into an altercation with anyone?

9 A No.

10 Q Fair to say you think he's a pussycat?

11 MS. STRAUB: Vague and ambiguous.

12 THE WITNESS: I don't know what you mean by  
13 that.

14 BY MR. BRIGGS:

15 Q As far as you know, he's just a super nice,  
16 sweet, soft guy, right?

17 A No.

18 Q No?

19 Would you describe him as a hard ass?

20 A No.

21 Q Did you --

22 A He's strong-willed, but I -- the pussycat, I  
23 don't -- I don't understand.

24 Q Is he ever aggressive toward anyone?

25 A No.

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DECLARATION UNDER PENALTY OF PERJURY

I hereby declare under penalty of perjury that the foregoing is my deposition under oath; that the foregoing is true and correct; that I have read my deposition and have made the necessary corrections, additions, or changes to my answers that I deem necessary.

Executed this \_\_\_\_ day of \_\_\_\_\_, 2019,  
at \_\_\_\_\_, \_\_\_\_\_  
(City) (State)

\_\_\_\_\_  
ALMA VELASQUEZ

Alma Velasquez 10/22/2019

1 STATE OF CALIFORNIA )  
2 : ss.  
3 COUNTY OF SAN DIEGO )

4 I, HEIDI J. JOHNSON, a Certified Shorthand Reporter  
5 for the State of California, CSR No. 12525, Registered  
6 Professional Reporter, do hereby certify: That the  
7 witness in the foregoing deposition was first duly sworn  
8 by me to testify to tell the truth, the whole truth, and  
9 nothing but the truth in the foregoing cause; that the  
10 deposition was taken before me at the time and place  
11 herein named; that the said deposition was reported by  
12 me in shorthand and transcribed through computer-aided  
13 transcription, under my direction; and that the  
14 foregoing is a true record of the testimony elicited at  
15 proceedings had at said deposition.

16 I do further certify that I am a  
17 disinterested person and am in no way interested in  
18 the outcome of this action or connected with or  
19 related to any of the parties in this action or to  
20 their respective counsel.

21 In witness whereof, I have hereunto set my  
22 hand this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

23

24

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\_\_\_\_\_  
HEIDI J. JOHNSON, RPR, CSR NO. 12525

Peterson Reporting Video & Litigation Services