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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

08/03/2022 at 03:49:00 PM

Clerk of the Superior Court
By E- Filing, Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN DIEGO – HALL OF JUSTICE

10 CHRISTOPHER WILLIAMS,

11 Plaintiff,

12 vs.

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

15 Defendants.

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

**PLAINTIFF CHRISTOPHER WILLIAMS'S
OPPOSITION TO DEFENDANTS'
MOTION *IN LIMINE*, 22 OF 23**

Action Filed: March 01, 2017
Department: C-68 (Whitney)

Trial Date: August 5, 2022
Trial Time: 8:30 a.m

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17 Plaintiff Christopher Williams ("Plaintiff") respectfully submits this brief in opposition to Defendant
18 David Arambula ("Arambula") and City of Lemon Grove ("City") (collectively, "Defendants")'s Motion *In*
19 *Limine* No. 22 to preclude testimony, inquiry, and comment concerning Plaintiff's wealth and ability to afford
20 medical treatment and psychological therapy.

21 Defendants contend that evidence of Plaintiff's financial means is not relevant, has no probative value,
22 and would confuse and mislead the jury. The motion should be denied. Not only is Plaintiff's financial status
23 relevant, but preventing him from discussing his ability to afford treatments may greatly confuse and mislead
24 the jury. To preclude any and all testimony regarding Plaintiff's ability to afford medical treatment, therapy,
25 and related services will therefore unduly prejudice Plaintiff at trial.

26 All relevant evidence is admissible except as otherwise provided by statute. EVID. CODE § 351. For
27 evidence to be relevant, it must have "any tendency in reason to provide or disprove any disputed fact that is
28 of consequence to the determination of the action". EVID. CODE § 210. Plaintiff's financial status has great

1 probative value because it can provide explanation for why Plaintiff did or did not seek or continue certain
2 treatments. Without providing such an explanation if and when necessary, the jury can be misled and
3 confused about the extent of his injuries, pain, and suffering. If Plaintiff cannot explain his process of obtaining
4 treatments for injuries, including any inability to afford treatments, the jury may be misled to believe that those
5 treatments were not necessary and will lead to incorrect conclusions concerning the state of Plaintiff's mental
6 and physical health since he was attacked by Arambula.

7 For these reasons, motion *in limine* no. 21 to preclude testimony, inquiry, and comment concerning
8 Plaintiff's wealth and ability to afford medical treatment and psychological therapy should be denied.

9
10 Date: August 3, 2022

Respectfully submitted,
BRIGGS LAW CORPORATION

11
12
13 By: _____

Nora Pasin
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PROOF OF SERVICE

1. My name is Keri Taylor. I am over the age of eighteen. I am employed in the State of California, County of San Bernardino.

2. My business residence address is Briggs Law Corporation, 99 East "C" Street, Suite 111 Upland, CA 91786

3. On August 3, 2022, I served an original copy a true and correct copy of the following documents: Plaintiff Christopher Williams's Opposition to Defendants' Motion in Limine 22

4. I served the documents on the person(s) identified on the attached mailing/service list as follows:

by personal service. I personally delivered the documents to the person(s) at the address(es) indicated on the list.

by U.S. mail. I sealed the documents in an envelope or package addressed to the person(s) at the address(es) indicated on the list, with first-class postage fully prepaid, and then I

deposited the envelope/package with the U.S. Postal Service

placed the envelope/package in a box for outgoing mail in accordance with my office's ordinary practices for collecting and processing outgoing mail, with which I am readily familiar. On the same day that mail is placed in the box for outgoing mail, it is deposited in the ordinary course of business with the U.S. Postal Service.

I am a resident of or employed in the county where the mailing occurred. The mailing occurred in the city of Upland, California.

by overnight delivery. I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized for receiving items for overnight delivery or at the service's office where such items are accepted for overnight delivery.

by facsimile transmission. Based on an agreement of the parties or a court order, I sent the documents to the person(s) at the fax number(s) shown on the list. Afterward, the fax machine from which the documents were sent reported that they were sent successfully.

by e-mail delivery. Based on the parties' agreement or a court order or rule, I sent the documents to the person(s) at the e-mail address(es) shown on the list. I did not receive, within a reasonable period of time afterward, any electronic message or other indication that the transmission was unsuccessful.

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

Date: August 3, 2022

Signature: 

SERVICE LIST

Christopher Williams vs. Lemon Grove
Superior Court of the State of California Case No. 37-2018-00023369-CU-PO-CTL

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