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

10
11 _____) CASE NO. 37-2018-00023369-CU-PO-CTL
12 CHRISTOPHER WILLIAMS,)
13 Plaintiff,) **COMPLAINT FOR DAMAGES**
14 vs.)
15 DAVID ARAMBULA; CITY OF LEMON)
16 GROVE; and DOES 1 through 1,000,)
17 Defendants.)

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

19 **Parties**

- 20 1. Plaintiff is a natural person and a resident of the City of San Diego.
- 21 2. Defendant DAVID ARAMBULA ("ARAMBULA") is a resident of the City of Lemon
22 Grove and a member of the Lemon Grove City Council; he is being sued in his private capacity and,
23 alternatively, in his official capacity. Defendant CITY OF LEMON GROVE ("CITY") is a municipal
24 corporation located in the County of San Diego.
- 25 3. The true names and capacities of the Defendants identified as DOES 1 through 1,000
26 are unknown to Plaintiff, who will seek the Court's permission to amend this pleading in order to allege
27 the true names and capacities as soon as they are ascertained. Plaintiff is informed and believes and
28 on that basis alleges that each of the fictitiously named Defendants 1 through 1,000 has some
cognizable liability or some cognizable interest in the subject matter of this lawsuit.

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"







