1 2 3	Kathryn Lee-Colgan, Esq. (Bar No.265416) Emily M. Straub, Esq. (Bar No. 259141) TYSON & MENDES 5661 La Jolla Boulevard La Jolla, CA 92037	FILED
4	Telephone: (858) 459-4400	FEB 28 2023
5		By: N. Calantoc, Deputy
6	Attorneys for Defendant DAVID ARAMBULA	
7	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	
8		HE STATE OF CALIFORNIA
9	FOR THE COUNTY OF SAN	DIEGO – CENTRAL DIVISION
10	CHRISTOPHER WILLIAMS,) Case No.: 37-2018-00023369-CU-PO-CTL
11	Plaintiff,	Judge: Hon. Richard S. Whitney Dept: C-68
12	v.) Dept. C-08
13	DAVID ARAMBULA; CITY OF LEMON GROVE; AND DOES 1 THROUGH 1,000,	JOINT TRIAL EXHIBIT LIST
15 16	Defendants.	Trial Date: February 17, 2023
17 18		

Exh. No.	Submitted by	<u>Description</u>	Objection Ground(s)	Date Identified	Date Admitted
1 A-E	Plaintiff	Photographs of Christopher Williams's injuries		311/23	3 1123
2	Plaintiff	Video of David Arambula in pool during meeting	2, 3, 6, 7		
3	Plaintiff	East County Magazine March 27, 2018 news article, "Criticism Mounts of Arambula and Lemon Grove Leaders After Disclosure of Assault Claim by Dispensary Advocate" by Miriam Raftery	2, 3, 5, 6, 7		

1	4	Plaintiff	Candid Chronicle March 15,	2, 3, 5, 6,		
1		Ĭ	2018 news article,	7		
2			"Something Does Not Add			
2			Up; Councilman Matt			
3			Mendoza Requests an			
4			Investigation" by Cara Anderson			
5	5	Plaintiff	East County Magazine March	2, 3, 5, 6,		
_			14, 2018 news article, "Lemon	7		
6			Grove Councilman Disputes			
7			Assault Claim, Says He Acted			
			in Self Defense" by Miriam Raftery.			
8	6	Plaintiff	San Diego Union Tribune	2, 3, 5, 6,		
9		1 10111111	March 13, 2018 news article,	7		
	;		"Lemon Grove Official Wants			i
10		1	Investigation" by Karen		*	
11			Pearlman			
	7	Plaintiff	San Diego Union Tribune	2, 3, 5, 6,		
12			March 9, 2018 news article,	7		
- 13			"Cannabis Businessman			
1.4			Accuses Lemon Grove			ļ
14			Councilman of Assault" by			
15	8	Plaintiff	Karen Pearlman Candid Chronicle March 9,	2, 3, 5, 6,		
1.0	"	Tamuii	2018 news article, "Lemon	7		
16			Grove Councilman Arambula			
17			Accused of Assaulting			
10			Dispensary Applicant" by			
18			Cara Anderson			
19	9	Plaintiff	Text messages between			
20			Taisha Brown and Chris			
20			Williams July 13, 2017 to			
21	10	Di ee	July 14, 2017	0.267		
22	10	Plaintiff	City of Lemon Grove City	2, 3, 6, 7	•	
22			Council Meeting Agenda, February 20, 2018			
23	11	Plaintiff	Lemon Grove City Council	2, 3, 6, 7		
24		1 101111111	Agenda Item Summary March	_, _, , , ,		
24			6, 2018			
25	12	Plaintiff	San Diego County Sheriff's	2, 3, 6, 7		
26			Department Public Records			
ا ۷۷			Request Victim Copy, July 15,			
27			2017		·	

- 28

1	13	Plaintiff	Email thread with Matt	2, 3, 6, 7		
			Mendoza, Karen Pearlman, and			
2			City of Lemon Grove staff, March 13, 2018			
3	14	Plaintiff	Matt Mendoza Press Release	2, 3, 6, 7	 	
5			Letter March 13, 2018	2, 5, 6, 7		
4	15	Plaintiff	Email thread between	2, 3, 6, 7		
5			Cara Anderson and Matt			
			Mendoza, November 14, 2019			
6	16	Plaintiff	2016-2018 Calendars kept	2, 3, 6, 7		
7			by City of Lemon Grove			
	17	Plaintiff	manager Lydia Romero Christopher Williams Tort	3, 5, 6, 7	-	
8			Claim to City of Lemon	3, 3, 0, 7		
9			Grove, January 11, 2018	•		
	18	Plaintiff	Deposition Transcript of			
10			David Arambula	u u		
11	19	Plaintiff	Deposition Transcript of			
11			Taisha Brown			
12	20	Plaintiff	Exhibit 1 to Deposition	3, 5, 6, 7		
13			Transcript of Taisha Brown			
15			(January 24, 2019 Declaration of Taisha	-		
14			Brown)		- -	·
15			Blown)			
	21		Reserved			
16	22	Plaintiff	Deposition Transcript of			
17			Alma Velasquez			
1.0	23	Plaintiff	Deposition Transcript of Allison Hader			
18	24	Plaintiff	Deposition Transcript of			
19		Tamini	Dorinna Hirsch			
20	25	Plaintiff	Deposition Transcript of			
20			Mike James			
21	26	Plaintiff	Deposition Transcript of			
22			Kathleen McClean	_		
22	27	Plaintiff	Deposition Transcript of			
23			Matt Mendoza		1	
24	28	Plaintiff	Deposition Transcript of Manuel Ortiz			
	29	Plaintiff	Deposition Transcript of	-		<u>-</u>
25		1 minute	Lousie O'Shaunnesy			
26	30	Plaintiff	Deposition Transcript of			
20			Lydia Romero			<u> </u>
27	31	Plaintiff	Deposition Transcript of			7
28	· [Debbie Stiesmeyer			
20						

1	32	Plaintiff	Exhibit 1 to Deposition	3, 6	1	
٠			Transcript of Debbie		1	
			Stiesmeyer (Police			
ı		D1 1 1 00	Records/Reports)	_		
	33	Plaintiff	Exhibit 2 to Deposition			
			Transcript of Debbie			
	24	D1-:4:66	Stiesmeyer (Police Photos)	<u> </u>	<u> </u>	
;	34	Plaintiff	Deposition Transcript of			
	35	Plaintiff	Racquel Vasquez Deposition Transcript of			27
۱ ا	33	Plainuit	Christopher Williams			
∙ ∥			(Volume 1)	:		
	36	Plaintiff	Deposition Transcript of			
·] 30		Christopher Williams			
			(Volume 2)			
ļ	37	Plaintiff	Video Deposition of David			
)	"		Arambula			
	38		Reserved			
	39		Reserved		,	
:	40		Reserved			
	41		Reserved			
	42	 	Reserved	<u> </u>		-
.	43		Reserved			
	44		Reserved		1	
·	45		Reserved		1	
5	46		Reserved			
ŀ	47		Reserved			
″	48		Reserved			
,	49		Reserved			
'	50	 				
۱ ا	201	Def David	Lemon Grove Municipal Code,	2, 6, 7		
		Arambula	Title 17 – Zoning, Section			
)]	,	17.32.090			
	202	Def David	Planning Permit Submittal	2, 6, 7		
ŀ	1	Arambula	Checklist (Medical Marijuana	,		
፡	1		Dispensary), revised March			-4
			2017		<u> </u>	
']	203	Def David	Marijuana Dispensaries,	2, 6, 7		
-		Arambula	Cultivation & Delivery	}		
,			Information Bulletin 23, dated March 2017			
′ ∥	204	Def David	Lemon Grove Medical	2, 6, 7		·
;	~~.	Arambula	Marijuana Dispensary Zoning		'	
,			Map, dated March 18, 2017		†o for	
⁷	205	Def David	Business License Application	2, 6, 7		
3		Arambula	for Broadway Patient Care		<u> </u>	

			(8260 Broadway), dated March 20, 2017			
	206	Def David Arambula	Business License Application for Lemon Grove Patient Care (6919 [sic] North Avenue), dated March 20, 2017	2, 6, 7		,
	207	Def David Arambula	Planning Permit Application (6915-35 North Avenue, no. ZC1-700-0016 (CUP-180- 0001)) dated March 20, 2017	2, 6, 7		
	208	Def David Arambula	Zoning Clearance Application (8260 Broadway, no. ZCM- 180-0006) dated April 6, 2017	2, 6, 7		
))	209	Def David Arambula	Letter from Austin Legal Group to City re appeal (8260 Broadway), dated April 10, 2017	2, 6, 7		
	210	Def David Arambula	Letter from City to Plaintiff re denial of zoning application (8260 Broadway), dated April 17, 2017	2, 6, 7	6	
3 1	211	Def David Arambula	Appeal Application & Request for Public Hearing (8260 Broadway), dated April 20, 2017	2, 6, 7	*	
5 6	212	Def David Arambula	Letter from City to Pick Axe Holdings and Mattar Family Trust re denial (8260 Broadway), dated May 8, 2017	2, 6, 7		<u> </u>
3	213	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re denial (6915 North Avenue), dated June 13, 2017	2, 6, 7		
) l	214	Def David Arambula	Text Messages between Taisha Brown and Christopher Williams, dated July 13, 2017 through July 18, 2017			
3	215	Def David Arambula	Crime/Incident Report no. 17136885.1, dated July 15, 2017	1		
1 5	216	Def David Arambula	Medical records of Alvarado Hospital Medical Center (produced September 24, 2018 without radiology reports, in response to Subpoena)	1		
7	217	Def David Arambula	Medical records of Alvarado Hospital Medical Center (produced October 17, 2018	1		

					1 -	
1			with radiology reports, in			
ŀ	218	Def David	response to Subpoena) Billing records of Alvarado	1		
2		Arambula	Hospital Medical Center			
3	219	Def David	Agenda Item Summary, Item	2, 6, 7		
4		Arambula	no. 7, (8260 Broadway), dated			
	220	Def David	July 18, 2017 First Request for Payment from	1		
5	220	Arambula	Alvarado Hospital Medical	_		
6			Center, dated July 31, 2017			
7	221	Def David Arambula	Letter from City to Plaintiff and MAVA re denial (2295	2, 6, 7		
		Arambula	Lemon Grove Avenue), dated			·
8			August 3, 2017			
9	222	Def David	Letter from Austin Legal	2, 6, 7		ļ.
10		Arambula	Group to City re Appeal (6915 North Avenue), dated August			
10			14, 2017			
11	223	Def David	Agenda Item Summary for	2, 6, 7		
12		Arambula	continued appeal hearing (8260			
			Broadway), dated August 15, 2017			
13	224	Def David	Item no. 6 from City agenda –	2, 6, 7		
14		Arambula	packet re public appeal (8260	, ,		
15			Broadway and 6915 North			
ı			Avenue), dated August 15, 2017			
16	225	Def David	Resolution 2017-3533 after	2, 6, 7		
17		Arambula	August 15, 2017 hearing (8260			
18.	226	D-CDid	Broadway)	267		
10.	226	Def David Arambula	Resolution 2017-3539 after August 15, 2017 hearing (6915	2, 6, 7		
19		7 Humoulu	North Avenue)			
20	227	Def David	Letter from City to Pick Axe	2, 6, 7		
21		Arambula	Holdings, LLC and Mattar Family Trust re denial (8260			
21			Broadway), dated August 21,			
22			2017			
23	228	Def David	Letter from City to Plaintiff	2, 6, 7		
α		Arambula	and MAVA re denial and abstention period (2295 Lemon			
24			Grove Avenue), dated August			
25			24, 2017			
26	229	Def David	Agenda Item Summary, Item	2, 6, 7		
		Arambula	no. 3, (6915 North Avenue), dated September 19, 2017			
27	230	Def David	Resolution no. 2017-3539	2, 6, 7	1	
28		Arambula	(6915 North Avenue), dated		<u> </u>	

September 19, 2017 231 Def David Item no. 8 from City packet re 2, 6, 7	
231 Def David Item no. 8 from City packet re 2, 6, 7	
2 Arambula public appeal (6915 North	
Avenue), dated September 19,	
3 2017	· · · · · · · · · · · · · · · · · · ·
232 Def David Letter from City to Plaintiff 2, 6, 7	
Manioula and Watta I aimly 1165t 10	
5 incomplete application (8280 Broadway), dated October 11,	
	ľ
6 2017 233 Def David Letter from City to Plaintiff 2, 6, 7	
7 Arambula and Mattar Family Trust re	
incomplete application (6915	
North Avenue), dated October	
9 11, 2017	
234 Def David Conditional Use Permit 2, 6, 7	
10 Arambula application (rejected) (6915	
North Avenue), dated	
11 December 11, 2017	
12 235 Def David Email from City to Plaintiff re 2, 6, 7 meeting and re-submittal (6915	
NT1 A 3-43	
North Avenue), dated December 12, 2017	*
14 236 Def David Conditional Use Permit 2, 6, 7	
Arambula Application (6915 North	1
Avenue), January 2018	
16 237 Def David Email chain between City and 2, 6, 7	
Arambula Plaintiff re re-submittals and	
submission process (6915	
North Avenue), dated January 18 11, 2018	
18 11, 2018 238 Def David Letter from City to Plaintiff 2, 6, 7	
19 Arambula Arambula	
incomplete application (6015	
North Avenue), dated March 8,	
21 2018	
239 Def David Letter from City to Plaintiff 2, 6, 7	
22 Arambula and Mattar re conditional	
approval of Cornerstone	
Drewery business ficense (8280)	
Broadway), dated May 10, 2018	
25 240 Def David Letter from City to Kathleen 2, 6, 7	
Arambula McLean and Mattar re response	
26 to status inquiry (8260	
Broadway) dated May 10	
	1
27 2018	

241	Def David Arambula	Complaint for Damages, filed by Plaintiff on May 11, 2018	1	3/1/23
242	Def David Arambula	Request for Production of Documents (Set One) propounded by City of Lemon Grove to Plaintiff, dated June 21, 2018	1	
243	Def David Arambula	Special Interrogatories (Set One) propounded by City of Lemon Grove to Plaintiff, dated June 21, 2018	1	
244	Def David Arambula	Form Interrogatories (Set One) propounded by City of Lemon Grove to Plaintiff, dated June 21, 2018	1	
245	Def David Arambula	Defendant City of Lemon Grove's Answer to Complaint, filed June 22, 2018	1	
246	Def David Arambula	Form Interrogatories (Set One) propounded to Plaintiff by David Arambula, dated July 11, 2018	1	
247	Def David Arambula	Defendant David Arambula's Special Interrogatories to Plaintiff, Set One, dated July 11, 2018	1	
248	Def David Arambula	Defendant David Arambula's Requests for Production of Documents to Plaintiff, Set One, dated July 11, 2018	1	
249	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Request for Production of Documents (Set One), dated August 14, 2018	1	
250	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Form Interrogatories (Set One), dated August 14, 2018	1	
251	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Special Interrogatories (Set One), dated August 14, 2018	1	
252	Def David Arambula	Plaintiff's Responses to Defendant City of Lemon Grove's Request for Production of Documents (Set One), dated August 14, 2018	1	

253	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Special Interrogatories (Set One), dated August 14, 2018	1	3/1/23
254	Def David Arambula	Supplemental Responses of Plaintiff to Defendant David Arambula's Form Interrogatories (Set One), dated September 27, 2018	1	
255	Def David Arambula	Supplemental Responses of Plaintiff to Defendant David Arambula's Special Interrogatories (Set One), dated September 27, 2018	1	3/1/23
256	Def David Arambula	Supplemental Responses of Plaintiff to Defendant David Arambula's Request for Production of Documents (Set One), dated September 27, 2018	1	
257	Def David Arambula	Minute Order granting (in part) Motion to Strike Portions of Complaint, dated October 5, 2018	1	
258	Def David Arambula	Email from Plaintiff to City re no question of zoning approval (2295 Lemon Grove and 8260 Broadway), dated November 1, 2018	2, 6, 7	
259	Def David Arambula	Defendant David Arambula's Answer to Complaint, filed November 29, 2018	1	
260	Def David Arambula	Planning Permit Application (2295 Lemon Grove Avenue), filed December 20, 2018	2, 6, 7	
261	Def David Arambula	Planning Permit Application (8260 Broadway), filed December 20, 2018	2, 6, 7	
262	Def David Arambula	CornerStone Market Business Plan, dated 2019	2, 6, 7	
263	Def David Arambula	CornerStone Market Financial Projections	2, 6, 7	
264	Def David Arambula	CornerStone Market Dispensary Investment package	2, 6, 7	
265	Def David Arambula	Pick Axe Holdings business package	2, 6, 7	
266	Def David Arambula	Follow-Up Report no. 17136885.2, dated January 18,	2, 6, 7	3/1/23

1						
٦			2019			
1	267	Def David	Letter from City to Plaintiff	2, 6, 7		
2		Arambula	and MAVA Irrevocable Trust			
ı			re denial of zoning clearance		į	
3			application (2295 Lemon			
4			Grove Avenue), dated January		!	
4	- 62		25, 2019	2 6 7		
5	268	Def David	Letter from City to Plaintiff	2, 6, 7		
		Arambula	and Mattar Family Trust re			
6			denial of zoning clearance application (8260 Broadway),			
7			dated January 25, 2019			
′ ∥	269	Def David	Planning Permit Application -	2, 6, 7		j,
8	1 207	Arambula	Appeal (for 8260 Broadway),	2 , 0, ,		′
			filed February 4, 2019			
9	270	Def David	Appeal Application & Request	2, 6, 7		
10	1	Arambula	for Public Hearing (8260			.
			Broadway), dated February 4,			
11			2019			
12	271	Def David	Letter from City to Plaintiff re	2, 6, 7		
12		Arambula	protected use disclosures (2295	İ		
13			Lemon Grove Avenue), dated	!		
, ,	070	Def David	February 11, 2019	2 6 7		
14	272	Arambula	Letter from City to Plaintiff re protected use disclosures (8260	2, 6, 7		
15		Arambula	Broadway), dated February 11,			
			2019			
16	273	Def David	Minute Order re City of Lemon	2, 6, 7		
17		Arambula	Grove's Motion for Summary	,		1
- ·			Judgment, or in the Alternative,			
18			Motion for Summary			
10			Adjudication, dated February			
19			11, 2019			
20	274	Def David	Letter from City to Plaintiff	2, 6, 7		
		Arambula	and Mattar Family Trust re	·		
21			Notice of Incomplete			
22		A	Conditional Use Permit (6915 North Avenue), dated February			
			14, 2019			
23	275	Def David	Plans for re-submittal (6915	2, 6, 7		
₂₄ ∦		Arambula	North Avenue), submitted June	_, _, ,		
24			2019			
25	276	Def David	Email from City to Plaintiff re	2, 6, 7	,	
i		Arambula	re-submittal of Conditional Use		,	
26			Permit application (6915 North			
27			Avenue), dated June 19, 2019			
~′	277	Def David	Notice of Deposition of	1		
28		Arambula	Plaintiff Christopher Williams		<u> </u>	

		-	(Volume II), dated July 1, 2019		1	
1	278	Def David	Item no. 2 from City agenda –	2, 6, 7		
		Arambula	packet re public appeal (8260			
2			Broadway), dated July 11,			
3			2019			
	279	Def David	Item no. 2 from City agenda –	2, 6, 7		
4		Arambula	packet re public appeal (2295			
5			Lemon Grove Avenue), dated			
,			July 11, 2019			
6	280	Def David	City Council Regular Meeting	2, 6, 7		
_ [Arambula	Agenda dated July 16, 2019			
7	281	Def David	City Council Staff Report –	2, 6, 7		
8		Arambula	Item no. 2 (2295 Lemon Grove			
ŭ			Avenue), dated July 16, 2019	2		
9	282	Def David	City Council Staff Report –	2, 6, 7		
		Arambula	Item no. 3 (8260 Broadway),			}
10	202	Def David	dated July 16, 2019 Email chain between Cara	2, 6, 7	1	
11	283	Arambula	Anderson and City re	2, 0, /		
		Alailibula	Resolution no. 01-25 (8260			1
12	`		Broadway), dated July 18,			
× 13	*		2019	- 14		
13	284	Def David	Letter from City to Plaintiff	2, 6, 7		
14		Arambula	and Mattar Family Trust re	_, -, -, -		
			Notice of Incomplete for			
15			Conditional Use Permit (6915			
16			North Avenue), dated August			1
			8, 2019			
17	285	Def David	Letter from City to Plaintiff	2, 6, 7		
10		Arambula	and Mattar Family Trust re			
18			Minor Use Permit (8280			
19		`	Broadway), dated September			
	286	Def David	19, 2019 Defendant David Arambula's	1		
20	200	Arambula	Supplemental Request for	*		
21		- Munibula	Production to Plaintiff			[
1			Christopher Williams, Set One,			
22			dated October 1, 2019			
	287	Def David	Defendant David Arambula's	1		·
23		Arambula	Requests for Production to			<u> </u>
24			Plaintiff Christopher Williams,			
			Set Two, dated October 1, 2019			
25	288	Def David	Defendant David Arambula's	1		
26		Arambula	Supplemental Interrogatory to	•		
, 20			Plaintiff Christopher Williams,			
27			Set One, dated October 1, 2019]
	000	D-ED ::	(w/Declaration)			
28	289	Def David	Supplemental Interrogatories	1	<u> </u>	

Ш						
1		Arambula	propounded by City of Lemon			
ı			Grove to Plaintiff, dated			
١	October 11, 2019			1 ,		
1	290	290 Def David Supplemental Request for				
J	į	Arambula Production of Document			1	
ı			propounded by City of Lemon		ļ	
I	Grove to Plaintiff, da		October 11, 2019			
I	291	Def David	Letter from City to Plaintiff	2, 6, 7		
ı	291	Arambula	and Mattar Family Trust re	2, 0, 7		
l		Alambula	Minor Use Permit (8280			
			Broadway), dated October 16,			
			2019			
		1				
	Arambula Initial Exchange of Expert					
			Witness Information;			
			Declaration of Emily M. Straub		•	
		·	in Support Thereof, dated			
		<u>. </u>	October 24, 2019			
	293	Def David	First Written Exchange of	1		
		Arambula	Required Expert Witness			
			Information of City of Lemon			
			Grove, dated October 24, 2019			
	294	Def David	Responses of Plaintiff to	1	,	
		Arambula	Defendant David Arambula's			
			Supplemental Interrogatory,			
	205	D CD :1	dated November 4, 2019	1		
	295	Def David	Responses of Plaintiff to Defendant David Arambula's	1		
1 1		Arambula				
	Special Interrogatories (Set		Two), dated November 4, 2019			
	296	Def David	Responses of Plaintiff to	1		
	~~~	Arambula	Defendant David Arambula's	_		
			Supplemental Request for.			
			Production, dated November 4,			
			2019		1	
	297	Def David	Responses of Plaintiff to	1		
		Arambula	Defendant David Arambula's		:	
			Request for Production (Set			
			Two), dated November 4, 2019			
	298	Def David	Letter from City to Plaintiff	2, 6, 7		
		Arambula	and Mattar Family Trust re			
	Notice of Decision on Minor					
	Use Permit (8280 Broadway),					
	dated November 5, 2019					
	299	299 Def David Exhibit 1 to the Deposition of		1		
		Arambula	Dr. Haders (Medical records of			
١	L	<u> </u>	Alvarado Hospital Medical	l	<u> </u>	L

R				177		
			Center, in response to			
1			Subpoena)			
2	300	Def David	Exhibit 1A to the Deposition of	1		!
		Arambula	Dr. Haders (Emergency			
3			Department Note, dated July			
,	·		15, 2017)			
4			Exhibit 1B to the Deposition of	1		
5	Arambula		Dr. Haders (Discharge information and instructions,			
_			dated July 15, 2017)			
6			Exhibit 1C to the Deposition of	1	<del>-</del>	
7	Arambula		Dr. Haders (Assessment	-		
		1 22 22 23	History Report, dated July 15,	·		
8			2017)		-	
9	303	Def David	Exhibit 1 to the Deposition of	1		
		Arambula	Dr. O'Shaughnessy (Medical			
10			records of Alvarado Hospital			-
11			Medical Center, in response to			
11	204	Def David	Subpoena)  Exhibit 1 A to the Deposition of	1		
12	304	Arambula	Exhibit 1A to the Deposition of Dr. O'Shaughnessy (Report of	1		
10		Alambula	x-ray examination of Plaintiff's			
13			right chest and ribs, dated July			
14		,	15, 2017)			
	305	Def David	Exhibit 1B to the Deposition of	1		
15		Arambula	Dr. O'Shaughnessy (Report of		ŀ	
16			Computed Tomography scan of			
l			Plaintiff's head, dated July 15,		<u>.</u>	
17	306	Def David	2017)	1	· ~	
18	306	Arambula	Exhibit 2 to the Deposition of Dr. O'Shaughnessy (Flash	] 1		
•		Atamoura	drive containing imaging		•	
19			records from Alvarado Hospital			
20			Medical Center, dated July 15,			
20			2017)			
21	307	Def David	Electronic radiology imaging	1		
		Arambula	from Alvarado Hospital			
22			Medical Center (produced	i		
23	200	DefDavid	September 24, 2018)		<u> </u>	
	308	Def David Arambula	Video of Deposition of Alma Velasquez, recorded on			
24	:	Atambula	October 22, 2019			
25			00.0001 22, 2017			
	309	Def David	Video excerpt compilation			
26		Arambula	from videotaped deposition of			
27	,		Alma Velasquez, recorded on			
21	October 22, 2019					
28	310		Reserved	<u> </u>		

					1
311		Reserved			
312		Reserved			
313		Reserved			
314		Reserved			
315		Reserved			
316		Reserved			
317		Demonstrative evidence – Boxing photo 1 of 2	2, 6, 7		
318		Demonstrative evidence – Boxing photo 2 of 2	2, 6, 7		
319		Demonstrative evidence – Drawing of Langer Lines	2, 6, 7		
320		Demonstrative evidence (RESERVED)			
321		Demonstrative evidence (RESERVED)			
322		Demonstrative evidence (RESERVED)			
323		Demonstrative evidence (RESERVED)			
324		Demonstrative evidence (RESERVED)			
325		Demonstrative evidence (RESERVED)			
326		Demonstrative evidence (RESERVED			
350	Defendant City of Lemon Grove	Plaintiff's Complaint			
351	Defendant City of Lemon Grove	Declaration of Taisha Brown			
352	Defendant City of Lemon Grove	Declaration of Plaintiff			
353	Defendant City of Lemon Grove	Plaintiff's Claim against City 1-11-18		3/1/23	3/1/23
354	Defendant City of Lemon Grove	Plaintiff's Complaint dated July 16, 2021			
355	Defendant City of	Plaintiff's Writ dated 10-16-2019			

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GRO	UNDS FOR OB	JECTION	ı						
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2. 3	2. Irrelevant (§210)								
4.	4. Best Evidence (§1500)								
7	(§1400, Identity)								
8.	Subsequent Re	epair (§1151)		•	•				
9.	Other (Specify	7 <b>)</b> .							
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JOINT EXHIBIT LIST