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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 EVIDENCE, INQUIRY,
AND COMMENT REGARDING DAVID
ARAMBULA'S ALLEGED SKINNY
DIPPING ON JULY 14, 2017;
DECLARATION OF EMILY M. STRAUB**

[Defense MIL No. 3 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 presenting any evidence, inquiry, and comment regarding Mr. Arambula's alleged skinny dipping in his pool on July 14, 2017.

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

DEC 6 '19 PM 3:36

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1 **I. INTRODUCTION**

2 It is anticipated plaintiff and his counsel of record will attempt to present the jury with video,
3 testimony, and other evidence concerning Mr. Arambula's alleged skinny dipping in his pool prior
4 to the physical altercation at issue in this lawsuit. It is also anticipated plaintiff's counsel will
5 comment upon and question potential jurors and witnesses about Mr. Arambula's alleged skinny
6 dipping. The Court should not permit any of these things to take place. Plaintiff has no credible
7 evidence to prove Mr. Arambula was indeed skinny dipping. More importantly, the purported
8 evidence plaintiff does have cannot be used to prove Mr. Arambula engaged in assault or battery; it
9 is not relevant to the lawsuit; it has no probative value; and it would otherwise be unduly prejudicial
10 to Mr. Arambula's defense. The motion should be granted for all of these reasons.

11 **II. AUTHORITY FOR MOTION**

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

17 **III. PERTINENT ALLEGATIONS AND DISCOVERY FINDINGS**

18 In plaintiff's Complaint, he alleges Mr. Arambula was skinny dipping in his pool on July 14,
19 2017, during a get-together that preceded the physical altercation at issue in this lawsuit.
20 (Declaration of Emily M. Straub ("Straub Decl.") at Exhibit 1 – Complaint, at ¶ 6.) Plaintiff's skinny
21 dipping allegations do not stop there. Plaintiff raises the same allegations again during his
22 deposition, and repeatedly throughout his responses to written discovery. (Straub Decl. at: Exhibit
23 2 – plaintiff's August 13, 2018 responses to Mr. Arambula's form interrogatories at No. 12.3; Exhibit
24 3 – plaintiff's August 13, 2018 responses to the City of Lemon Grove's form interrogatories at No.
25 12.3; Exhibit 4 – plaintiff's August 13, 2018 responses to Mr. Arambula's special interrogatories at
26 No. 20; Exhibit 5 – plaintiff's September 26, 2018 supplemental responses to Mr. Arambula's
27 special interrogatories at Nos. 21-26; Exhibit 6 – transcript excerpts from Vol. 1 of plaintiff's
28 deposition on January 8, 2019, at 187:20-188:11; Exhibit 7 – transcript excerpts from Vol. 2 of

1 plaintiff's deposition on September 24, 2019, 412:1-7.)

2 Additionally, while both Mr. Arambula and others present during the get-together testified
3 Mr. Arambula did not go skinny dipping on the date in question, plaintiff's counsel nevertheless
4 proceeded to (a) question multiple additional witnesses about this during their deposition, and
5 (b) play a video of Mr. Arambula in his pool on July 14, 2017 during the depositions, that does not
6 show him naked. (Straub Decl. at: Exhibit 8 – transcript excerpts from deposition of Mr. Arambula
7 on October 26, 2018, at 55:14-20; Exhibit 9 – transcript excerpts from deposition of Mayor Racquel
8 Vasquez on November 30, 2018, at 212:3-213:24; Exhibit 10 – transcript excerpts from deposition
9 of Manuel Ortiz on February 18, 2019, at 36:20-25, 37:1-19; Exhibit 11 – transcript excerpts from
10 deposition of Taisha Brown on March 26, 2019, at 42:22-43:21; Exhibit 12 – transcript excerpts
11 from deposition of Alma Velasquez on October 22, 2019, at 34:14-36:8.)

12 **IV. THE ALLEGED SKINNY DIPPING IS NOT RELEVANT**

13 Evidence Code § 350 states: "No evidence is admissible except relevant evidence."
14 Evidence is relevant if it has a "tendency in reason to prove or disprove any disputed fact that is of
15 consequence to the determination of the action." (Evid. Code § 210; *People v. Nelson* (2008) 43
16 Cal.4th 1242, 1266; *Donlen v. Fort Motor Co.* (2013) 217 Cal.App.4th 138, 148; *D.Z. v. Los*
17 *Angeles Unified School Dist.* (2019) 35 Cal.App.5th 210, 229.) The test of relevance is whether the
18 evidence tends, "logically, naturally and by reasonable inference" to establish material facts such
19 as identity, intent or motive. (*People v. Wilson* (2006) 38 Cal.4th 1237, 1245.)

20 Here, as discussed, *supra*, plaintiff went to great lengths to raise the topic of Mr. Arambula's
21 alleged skinny dipping in his Complaint, discovery responses, deposition testimony, and in his
22 counsel's deposition questioning of other witnesses. While Mr. Arambula and others have testified
23 this did not occur, and there is no evidence proving otherwise, it simply does not matter if the skinny
24 dipping took place. Why? It has no relevance to this lawsuit. There is nothing plaintiff could
25 conceivably use the alleged skinny dipping for to establish any material facts of consequence in
26 this case. What Mr. Arambula did or did not do in his pool prior to the subject physical altercation
27 has absolutely no bearing on plaintiff's claims in this lawsuit. Plaintiff and his counsel should

28 ///

1 therefore be precluded from introducing any evidence of, or otherwise commenting or questioning
2 about, the alleged skinny dipping.

3 **V. THE ALLEGED SKINNY DIPPING CANNOT BE USED TO PROVE MR.**
4 **ARAMBULA COMMITTED ASSAULT OR BATTERY**

5 Evidence of a defendant's prior conduct cannot be used to prove the defendant subsequently
6 engaged in, or had the propensity to engage in, other conduct. (Evid. Code § 1101(a); *People v.*
7 *Jackson* (2016) 1 Cal.5th 269, 299 (“Evidence Code section 1101, subdivision (a) sets forth the
8 “strongly entrenched” rule that propensity evidence is not admissible to prove a defendant's conduct
9 on a specific occasion.”); *Holdgrafer v. Unocal Corp.* (2008) 160 Cal.App.4th 907, 928
10 (“[E]vidence of a defendant's prior bad acts or bad character is generally inadmissible to prove a
11 propensity or disposition to engage in conduct on a specified occasion.”).)

12 Even if it were true Mr. Arambula was skinny dipping in his pool prior to the incident (and
13 it is not) plaintiff cannot use such conduct to prove Mr. Arambula committed assault or battery.
14 This is yet another reason why the motion should be granted.

15 **VI. EVIDENCE, INQUIRY, AND/OR COMMENT CONCERNING THE ALLEGED**
16 **SKINNY DIPPING WOULD BE UNDULY PREJUDICIAL**

17 Evidence Code § 352 states:

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

21 In assessing whether to admit video evidence, “[t]he question the trial court must resolve is
22 whether the prejudicial impact of the videotape outweighs its value in assisting the jury to
23 understand and evaluate the other evidence presented in the case.” (*People v. Ibarra* (2007) 151
24 Cal.App.4th 1145, 1150.)

25 In weighing “prejudice” against the probative value of the evidence, the court looks to
26 whether the evidence is likely to inflame the jury’s passions (*People v. Hendrix* (2013) 214
27 Cal.App.4th 216, 246,) or whether the evidence tends to evoke an emotional bias (*People v. Daniels*
28 (2009) 176 Cal.App.4th 304, 317.) The California Supreme Court instructs:

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'
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.

5 *People v. Scott* (2011) 52 Cal.4th 452, 491.

6 Here, as discussed *supra*, the alleged skinny dipping is not relevant to the claims in this
7 lawsuit. As such, any evidence concerning this subject has no probative value. The only purposes
8 this evidence would serve would be to irritate and inflame the jury, not to mention embarrass and
9 harass Mr. Arambula. Mr. Arambula is a political figure, serving as a councilmember for City
10 Council in the City of Lemon Grove. In light of the current political climate, evidence of
11 inappropriate behavior by Mr. Arambula would very likely lead a jury to dislike Mr. Arambula and
12 find against him as a result of this bias. This would be unduly prejudicial to Mr. Arambula's
13 defense. The motion should therefore be granted.

14 **VII. CONCLUSION**

15 For the foregoing reasons, Mr. Arambula respectfully requests the Court grant this motion
16 and issue and order precluding plaintiff and his counsel from presenting any evidence, inquiry, and
17 comment regarding Mr. Arambula's alleged skinny dipping in his pool on July 14, 2017.

18
19
20 Dated: December 5, 2019

TYSON & MENDES

21
22 By:  _____

Jessica G. Heppenstall, Esq.

Emily M. Straub, Esq.

Attorneys for Defendant DAVID ARAMBULA

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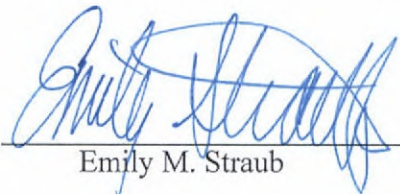
from is a true and correct copy of select transcript excerpts from the deposition of Mayor Racquel Vasquez on November 30, 2018.

13. Attached hereto as Exhibit 10 is a true and correct copy of select transcript excerpts from is a true and correct copy of select transcript excerpts from the deposition of Manuel Ortiz on February 18, 2019.

14. Attached hereto as Exhibit 11 is a true and correct copy of select transcript excerpts from is a true and correct copy of select transcript excerpts from the deposition of Taisha Brown on March 26, 2019.

15. Attached hereto as Exhibit 12 is a true and correct copy of select transcript excerpts from is a true and correct copy of select transcript excerpts from the deposition of Alma Velasquez on October 22, 2019.

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 5th day of December, 2019, at La Jolla, California.



Emily M. Straub

EXHIBIT 1

1 BRIGGS LAW CORPORATION [FILE: 1939.00]
2 Cory J. Briggs (State Bar no. 176284)
3 Anthony N. Kim (State Bar no. 283353)
4 99 East "C" Street, Suite 111
5 Upland, CA 91786
6 Telephone: 909-949-7115

7 Attorneys for Plaintiff Christopher Williams

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

05/11/2018 at 04:39:34 PM
Clerk of the Superior Court
By Laura Melles, Deputy Clerk

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

10
11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 vs.

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

16 Defendants.

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

COMPLAINT FOR DAMAGES

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

18 **Parties**

19 1. Plaintiff is a natural person and a resident of the City of San Diego.

20 2. Defendant DAVID ARAMBULA ("ARAMBULA") is a resident of the City of Lemon
21 Grove and a member of the Lemon Grove City Council; he is being sued in his private capacity and,
22 alternatively, in his official capacity. Defendant CITY OF LEMON GROVE ("CITY") is a municipal
23 corporation located in the County of San Diego.

24 3. The true names and capacities of the Defendants identified as DOES 1 through 1,000
25 are unknown to Plaintiff, who will seek the Court's permission to amend this pleading in order to allege
26 the true names and capacities as soon as they are ascertained. Plaintiff is informed and believes and
27 on that basis alleges that each of the fictitiously named Defendants 1 through 1,000 has some
28 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.

COMPLAINT FOR DAMAGES

Exhibit "A"









EXHIBIT 2

1 BRIGGS LAW CORPORATION [FILE: 1939.00]
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2 Anthony N. Kim (State Bar no. 283353)
99 East "C" Street, Suite 111
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Telephone: 909-949-7115

4 Attorneys for Plaintiff Christopher Williams
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN DIEGO – HALL OF JUSTICE
10

11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 vs.

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

16 Defendants.

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

PLAINTIFF, CHRISTOPHER
WILLIAM'S RESPONSES TO
DEFENDANT DAVID ARAMBULA'S
FORM INTERROGATORIES (SET ONE)

17 PROPOUNDING PARTY: DAVID ARAMBULA

18 RESPONDING PARTY: CHRISTOPHER WILLIAMS

19 SET NUMBER: ONE

20 Plaintiff Christopher Williams ("Responding Party"), responds as follows to the above-
21 identified Form Interrogatories from Defendant David Arambula ("Propounding Party").

22 **Preliminary Statement**

23 Responding Party has not completed discovery in this action and has not completed preparation
24 for trial. Accordingly, all of the responses contained herein are based only upon such information and
25 documents that are presently available to, and specifically known by, Responding Party and disclose
26 only those contentions which presently occur to Responding Party. It is anticipated that further
27 discovery and analysis will supply additional facts, add meaning to known facts, as well as establish
28 entirely new factual conclusions and legal contentions, all of which may lead to substantial additions

1 to, changes in, and variations from, the responses set forth herein. The following responses are given
2 without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact
3 or facts which Responding Party may later recall. Responding Party accordingly reserves the right to
4 supplement any and all responses herein as additional facts are ascertained, analyses are made, legal
5 research is completed, and contentions are investigated.

6 The responses contained herein are made in a good-faith effort to supply as much factual
7 information and as much specification of legal contentions as is presently known, but should in no way
8 be to the prejudice of Responding Party in relation to further discovery, research, analysis, or
9 presentation of evidence at trial.

10 These responses are made solely for the purpose of, and in relation to, this action. Each
11 response is given subject to all appropriate objections, including, but not limited to, objections
12 concerning competency, relevancy, materiality, propriety, and admissibility, which would require the
13 exclusion of any statement contained herein if the request were asked of, or any statement contained
14 herein were made by, a witness present and testifying in court. All such objections and grounds
15 therefore are reserved and may be interposed at the time of trial.

16 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
17 implied or inferred. The fact that a request herein has been responded to should not be taken as an
18 admission, or a concession of the existence of any facts set forth, or assumed by, such a request, or that
19 such response constitutes evidence of any facts thus set forth or assumed. All responses must be
20 construed as given on the basis of present recollection.

21 **Form Interrogatory No. 1.1:**

22 State the name, ADDRESS, telephone number, and relationship to you of each PERSON who
23 prepared or assisted in the preparation of the responses to these interrogatories.

24 **Response to Form Interrogatory No. 1.1:**

25 Christopher Williams (contacted through counsel); Briggs Law Corporation (address above).

26 **Form Interrogatory No. 2.1:**

27 State:

28 (a) your name;

1 (b) every name you have used in the past; and

2 (c) the dates you used each name.

3 **Response to Form Interrogatory No. 2.1:**

4 Christopher Williams

5 Christopher Stocker (used from 1988-1999 in school)

6 **Form Interrogatory No. 2.2:**

7 State the date and place of your birth.

8 **Response to Form Interrogatory No. 2.2:**

9 San Diego, CA

10 **Form Interrogatory No. 2.3:**

11 At the time of the INCIDENT, did you have a driver's license? If so state:

12 (a) the state or other issuing entity;

13 (b) the license number and type;

14 (c) the date of issuance; and

15 (d) all restrictions.

16 **Response to Form Interrogatory No. 2.3:**

17 Yes

18 (a) California

19 (b) Objection: This information is protected by Responding Party's right of privacy.

20 (c) February 19, 2016

21 (d) No.

22 **Form Interrogatory No. 2.4:**

23 At the time of the INCIDENT, did you have any other permit or license for the operation of a
24 motor vehicle? If so, state

25 (a) the state or other issuing entity;

26 (b) the license number and type;

27 (c) the date of issuance; and

28 (d) all restrictions.

1 **Response to Form Interrogatory No. 2.4:**

2 No.

3 **Form Interrogatory No. 2.5:**

4 State:

5 (a) your present residence ADDRESS;

6 (b) your residence ADDRESSES for the past five years; and

7 (c) the dates you lived at each ADDRESS.

8 **Response to Form Interrogatory No. 2.5:**

9 6257 Thorn Street, San Diego, CA 92115

10 **Form Interrogatory No. 2.6:**

11 State:

12 (a) the name, ADDRESS, and telephone number of your present employer or place of self-
13 employment; and

14 (b) the name, ADDRESS, dates of employment, job title, and nature of work for each employer
15 or self-employment you have had from five years before the INCIDENT until today.

16 **Response to Form Interrogatory No. 2.6:**

17 (a) Self-employed; Xperience Transportation, 7364 Mission Gorge Road, San Diego, CA 92120.

18 (b) Self-employed; Xperience Transportation, 7364 Mission Gorge Road, San Diego, CA 92120.

19 **Form Interrogatory No. 2.7:**

20 State:

21 (a) the name and ADDRESS of each school or other academic or vocational institution you have
22 attended, beginning with high school;

23 (b) the dates you attended;

24 (c) the highest grade level you have completed; and

25 (d) the degrees received.

26 **Response to Form Interrogatory No. 2.7:**

27 (a) Serra High School 1996;

28 (b) Patrick Henry 1997;

- 1 (c) Challenge 1998; and
2 (d) El Cajon Valley High School 1999.

3 **Form Interrogatory No. 2.8:**

4 Have you ever been convicted of a felony? If so, for each conviction state:

- 5 (a) the city and state where you were convicted;
6 (b) the date of conviction;
7 (c) the offense; and
8 (d) the court and case number.

9 **Response to Form Interrogatory No. 2.8:**

10 No.

11 **Form Interrogatory No. 2.9:**

12 Can you speak English with ease? If not, what language and dialect do you normally use?

13 **Response to Form Interrogatory No. 2.9:**

14 Yes.

15 **Form Interrogatory No. 2.10:**

16 Can you read and write English with ease? If not, what language and dialect do you normally
17 use?

18 **Response to Form Interrogatory No. 2.10:**

19 Yes.

20 **Form Interrogatory No. 2.11:**

21 At the time of the INCIDENT were you acting as an agent or employee for any PERSON? If
22 so, state:

- 23 (a) the name, ADDRESS, and telephone number of that PERSON; and
24 (b) a description of your duties.

25 **Response to Form Interrogatory No. 2.11:**

26 No.
27
28

1 **Form Interrogatory No. 2.12:**

2 At the time of the INCIDENT did you or any other person have any physical, emotional, or
3 mental disability or condition that may have contributed to the occurrence of the INCIDENT? If so, for
4 each person state:

5 (a) the name, ADDRESS, and telephone number;

6 (b) the nature of the disability or condition; and

7 (c) the manner in which the disability or condition contributed to the occurrence of the
8 INCIDENT.

9 **Response to Form Interrogatory No. 2.12:**

10 I did not. I do no personal knowledge of David Arambula's disability or condition.

11 **Form Interrogatory No. 2.13:**

12 Within 24 hours before the INCIDENT did you or any person involved in the INCIDENT use
13 or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of
14 any kind (prescription or not)? If so, for each person state:

15 (a) the name, ADDRESS, and telephone number;

16 (b) the nature or description of each substance;

17 (c) the quantity of each substance used or taken;

18 (d) the date and time of day when each substance was used or taken;

19 (e) the ADDRESS where each substance was used or taken;

20 (f) the name, ADDRESS, and telephone number of each person who was present when each
21 substance was used or taken; and

22 (g) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER who
23 prescribed or furnished the substance and the condition for which it was prescribed or furnished.

24 **Response to Form Interrogatory No. 2.13:**

25 Yes, I smoked one cannabis joint roughly 22 hours before the attack (just before going to bed
26 the on July 13, 2017).

1 **Form Interrogatory No. 4.1:**

2 At the time of the INCIDENT, was there in effect any policy of insurance through which you
3 were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage
4 or medical expense coverage) for the damages, claims, or actions that have arisen out of the
5 INCIDENT? If so, for each policy state:

6 (a) the kind of coverage;

7 (b) the name and ADDRESS of the insurance company;

8 (c) the name, ADDRESS, and telephone number of each named insured;

9 (d) the policy number;

10 (e) the limits of coverage for each type of coverage contained in the policy;

11 (f) whether any reservation of rights or controversy or coverage dispute exists between you and
12 the insurance company; and

13 (g) the name, ADDRESS, and telephone number of the custodian of the policy.

14 **Response to Form Interrogatory No. 4.1:**

15 No.

16 **Form Interrogatory No. 4.2:**

17 Are you self-insured under any statute for the damages, claims, or actions that have arising out
18 of the INCIDENT? If so, specify the statute.

19 **Response to Form Interrogatory No. 4.2:**

20 No.

21 **Form Interrogatory No. 6.1:**

22 Do you attribute any physical, mental, or emotional injuries to the INCIDENT?

23 **Response to Form Interrogatory No. 6.1:**

24 Yes. I have extreme stress and loss of sleep. I have feelings of shame, embarrassment, and
25 fright.

26 **Form Interrogatory No. 6.2:**

27 Identify each injury you attribute to the INCIDENT and the area of your body affected.
28

1 **Response to Form Interrogatory No. 6.2:**

2 See Responding Party's response to the accompanying special interrogatories.

3 **Form Interrogatory No. 6.3:**

4 Do you still have any complaints that you attribute to the INCIDENT? If so, for each complaint
5 state:

6 (a) a description;

7 (b) whether the complaint is subsiding, remaining the same, or becoming worse; and

8 (c) the frequency and duration.

9 **Response to Form Interrogatory No. 6.3:**

10 See Responding Party's response to the accompanying special interrogatories.

11 **Form Interrogatory No. 6.4:**

12 Did you receive any consultation or examination (except from expert witnesses covered by
13 Code of Civil Procedure sections 2034.210-2034.310) or treatment from a HEALTH CARE
14 PROVIDER for any injury you attribute to the INCIDENT? If so, for each HEALTH CARE
15 PROVIDER state:

16 (a) the name, ADDRESS, and telephone number;

17 (b) the type of consultation, examination, or treatment provided;

18 (c) the dates you received consultation, examination, or treatment; and

19 (d) the charges to date.

20 **Response to Form Interrogatory No. 6.4:**

21 Yes. See Responding Party's response to the accompanying special interrogatories.

22 **Form Interrogatory No. 6.5:**

23 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the
24 INCIDENT? If so, for each medication state:

25 (a) the name;

26 (b) the PERSON who prescribed or furnished it;

27 (c) the date it was prescribed or furnished;

28 (d) the dates you began and stopped taking it; and

.1 (e) the cost to date.

2 **Response to Form Interrogatory No. 6.5:**

3 The doctors prescribed opioids for me when they treated my injuries following the attack. But
4 I did not take them.

5 **Form Interrogatory No. 6.6:**

6 Are there any other medical services necessitated by the injuries that you attribute to the
7 INCIDENT that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for
8 each service state:

9 (a) the nature;

10 (b) the date;

11 (c) the cost; and

12 (d) the name, ADDRESS, and telephone number of each provider.

13 **Response to Form Interrogatory No. 6.6:**

14 Unknown.

15 **Form Interrogatory No. 6.7:**

16 Has any HEALTH CARE PROVIDER advised that you may require future or additional
17 treatment for any injuries that you attribute to the INCIDENT? If so, for each injury state:

18 (a) the name and ADDRESS of each HEALTH CARE PROVIDER;

19 (b) the complaints for which the treatment was advised; and

20 (c) the nature, duration, and estimated cost of the treatment.

21 **Response to Form Interrogatory No. 6.7:**

22 See Responding Party's response to the accompanying special interrogatories.

23 **Form Interrogatory No. 7.1:**

24 Do you attribute any loss of or damage to a vehicle or other property to the INCIDENT? If so,
25 for each item of property:

26 (a) describe the property;

27 (b) describe the nature and location of the damage to the property;

28

1 (c) state the amount of damage you are claiming for each item of property and how the amount
2 was calculated; and

3 (d) if the property was sold, state the name, ADDRESS, and telephone number of the seller, the
4 date of sale, and the sale price.

5 **Response to Form Interrogatory No. 7.1:**

6 Only to the clothes I was wearing that night: shirt, pants, and shoes. My best estimate is that
7 my clothing that night cost \$300-\$400. There was no way to get the blood stains out of my clothing,
8 so they had to be thrown away. I also spent about \$200 to have blood stains removed from my car
9 seats.

10 **Form Interrogatory No. 7.2:**

11 Has a written estimate or evaluation been made for any item of property referred to in your
12 answer to the preceding interrogatory? If so, for each estimate or evaluation state:

13 (a) the name, ADDRESS, and telephone number of the PERSON who prepared it and the date
14 prepared;

15 (b) the name, ADDRESS, and telephone number of each PERSON who has a copy of it; and

16 (c) the amount of damage stated.

17 **Response to Form Interrogatory No. 7.2:**

18 No.

19 **Form Interrogatory No. 7.3:**

20 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so,
21 for each item state:

22 (a) the date repaired;

23 (b) a description of the repair;

24 (c) the repair cost;

25 (d) the name, ADDRESS, and telephone number of the PERSON who repaired it;

26 (e) the name, ADDRESS, and telephone number of the PERSON who paid for the repair.

27 **Response to Form Interrogatory No. 7.3:**

28 See the response to Form Interrogatory 7.1.

1 **Form Interrogatory No. 8.1:**

2 Do you attribute any loss of income or earning capacity to the INCIDENT?

3 **Response to Form Interrogatory No. 8.1:**

4 Yes.

5 **Form Interrogatory No. 8.2:**

6 State:

7 (a) the nature of your work;

8 (b) your job title at the time of the INCIDENT; and

9 (c) the date your employment began.

10 **Response to Form Interrogatory No. 8.2:**

11 For the last several years, I have been trying to obtain land-use approvals for medical-marijuana
12 dispensaries in the City of Lemon Grove. The City has become extraordinarily difficult and
13 unreceptive to my applications since Arambula attacked me and have put up illegal barriers by treating
14 me differently from other applicants presenting similar applications.

15 **Form Interrogatory No. 8.3:**

16 State the last date before the INCIDENT that you worked for compensation.

17 **Response to Form Interrogatory No. 8.3:**

18 July 14, 2017.

19 **Form Interrogatory No. 8.4:**

20 State your monthly income at the time of the INCIDENT and how the amount was calculated.

21 **Response to Form Interrogatory No. 8.4:**

22 Objection: This interrogatory violates Responding Party's right of privacy and is outside the
23 scope of permissible discovery. He is not claiming lost wages..

24 **Form Interrogatory No. 8.5:**

25 State the date you returned to work at each place of employment following the INCIDENT.

26 **Response to Form Interrogatory No. 8.5:**

27 August 1, 2017.

28

1 **Form Interrogatory No. 8.6:**

2 State the dates you did not work and for which you lost income as a result of the INCIDENT.

3 **Response to Form Interrogatory No. 8.6:**

4 See the response to Form Interrogatory no. 8.4.

5 **Form Interrogatory No. 8.7:**

6 State the total income you have lost to date as a result of the INCIDENT and how the amount
7 was calculated.

8 **Response to Form Interrogatory No. 8.7:**

9 See the response to Form Interrogatory no. 8.4.

10 **Form Interrogatory No. 8.8:**

11 Will you lose income in the future as a result of the INCIDENT? If so, state:

12 (a) the facts upon which you base this contention;

13 (b) an estimate of the amount;

14 (c) an estimate of how long you will be unable to work; and

15 (d) how the claim for future income is calculated.

16 **Response to Form Interrogatory No. 8.8:**

17 Unknown at this time.

18 **Form Interrogatory No. 9.1:**

19 Are there any other damages that you attribute to the INCIDENT? If so, for each item of
20 damage state:

21 (a) the nature;

22 (b) the date it occurred;

23 (c) the amount; and

24 (d) the name, ADDRESS, and telephone number of each PERSON to whom an obligation was
25 incurred.

26 **Response to Form Interrogatory No. 9.1:**

27 Yes. Pain and suffering, emotional distress, interference with economic opportunities through
28 retaliation in processing land-use applications by Propounding Party.

1 **Form Interrogatory No. 9.2:**

2 Do any DOCUMENTS support the existence or amount of any item of damages claimed in
3 interrogatory 9.1? If so, describe each document and state the name, ADDRESS, and telephone number
4 of the PERSON who has each DOCUMENT.

5 **Response to Form Interrogatory No. 9.2:**

6 All known documents, other than those already contained in Propounding Party's files at city
7 hall, will be produced with Responding Party's response to the accompanying request for production
8 of documents.

9 **Form Interrogatory No. 10.1:**

10 At any time before the INCIDENT did you have complaints or injuries that involved the same
11 part of your body claimed to have been injured in the INCIDENT? If so, for each state:

12 (a) a description of the complaint or injury;

13 (b) the dates it began and ended; and

14 (c) the name, ADDRESS, and telephone number of each HEALTH CARE PROVIDER whom
15 you consulted or who examined or treated you.

16 **Response to Form Interrogatory No. 10.1:**

17 No.

18 **Form Interrogatory No. 11.1:**

19 Except for this action, in the past 10 years have you filed an action or made a written claim or
20 demand for compensation for your personal injuries? If so, for each action, claim, or demand state:

21 (a) the date, time, and place and location (closest street ADDRESS or intersection) of the
22 INCIDENT giving rise to the action, claim, or demand;

23 (b) the name, ADDRESS, and telephone number of each PERSON against whom the claim or
24 demand was made or the action filed;

25 (c) the court, names of the parties, and case number of any action filed;

26 (d) the name, ADDRESS, and telephone number of any attorney representing you;

27 (e) whether the claim or action has been resolved or is pending; and

28 (f) a description of the injury.

1 **Response to Form Interrogatory No. 11.1:**

2 No.

3 **Form Interrogatory No. 11.2:**

4 In the past 10 years have you made a written claim or demand for workers' compensation
5 benefits? If so, for each claim or demand state:

6 (a) the date, time, and place of the INCIDENT giving rise to the claim;

7 (b) the name, ADDRESS, and telephone number of your employer at the time of the injury;

8 (c) the name, ADDRESS, and telephone number of the workers' compensation insurer and the
9 claim number;

10 (d) the period of time during which you received workers' compensation benefits;

11 (e) a description of the injury;

12 (f) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER who
13 provided services; and

14 (g) the case number at the Workers' Compensation Appeals Board.

15 **Form Interrogatory No. 11.2:**

16 No.

17 **Form Interrogatory No. 12.1:**

18 State the name, ADDRESS, and telephone number of each individual:

19 (a) who witnessed the INCIDENT or the events occurring immediately before and after the
20 INCIDENT;

21 (b) who made any statement at the scene of the INCIDENT;

22 (c) who heard any statements made about the INCIDENT by any individual at the scene; and

23 (d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of the
24 INCIDENT (except for expert witnesses covered by Code of Civil Procedure section 2034).

25 **Response to Form Interrogatory No. 12.1:**

26 INCIDENT

27 (a) Before Incident: Responding Party; Tiasha Brown 619-443-8989; Racquel Vasquez
28 phone number unknown; David Arambula.

1 (b) Responding Party, Tiasha Brown, Racquel Vasquez, and David Arambula made
2 statements at the place of the incident.

3 (c) Responding Party, Tiasha Brown, Racquel Vasquez, and David Arambula made
4 statements at the place of the incident.

5 (d) Responding Party, Tiasha Brown, David Arambula made statements about the incident.

6 (e) Kathleen McLean.

7 **Form Interrogatory No. 12.2:**

8 Have YOU OR ANYONE ACTING ON YOUR BEHALF interviewed any individual
9 concerning the INCIDENT? If so, for each individual state:

10 (a) the name, ADDRESS, and telephone number of the individual interviewed;

11 (b) the date of the interview; and

12 (c) the name, ADDRESS, and telephone number of the PERSON who conducted the interview.

13 **Response to Form Interrogatory No. 12.2:**

14 No.

15 **Form Interrogatory No. 12.3:**

16 Have YOU OR ANYONE ACTING ON YOUR BEHALF obtained a written or recorded
17 statement from any individual concerning the INCIDENT? If so, for each statement state:

18 (a) the name, ADDRESS, and telephone number of the individual from whom the statement was
19 obtained;

20 (b) the name, ADDRESS, and telephone number of the individual who obtained the statement;

21 (c) the date the statement was obtained; and

22 (d) the name, ADDRESS, and telephone number of each PERSON who has the original
23 statement or a copy.

24 **Response to Form Interrogatory No. 12.3:**

25 Yes. I received a video from Tiasha Brown showing David Arambula naked in his pool.
26
27
28

1 **Form Interrogatory No. 12.4:**

2 Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any photographs, films, or
3 videotapes depicting any place, object, or individual concerning the INCIDENT or plaintiffs injuries?

4 If so, state:

5 (a) the number of photographs or feet of film or videotape;

6 (b) the places, objects, or persons photographed, filmed, or videotaped;

7 (c) the date the photographs, films, or videotapes were taken;

8 (d) the name, ADDRESS, and telephone number of the individual taking the photographs, films,
9 or videotapes; and

10 (e) the name, ADDRESS, and telephone number of each PERSON who has the original or a
11 copy of the photographs, films, or videotapes.

12 **Response to Form Interrogatory No. 12.4:**

13 Yes.

14 (a) 36 pictures taken on July 15, 2017, and one 24-second video taken on July 14, 2017.

15 (b) Responding Party was photographed in all photos. David Arambula was videotaped in
16 his pool at his property in Lemon Grove.

17 (c) 36 pictures taken on July 15, 2017, and one 24-second video taken on July 14, 2017.

18 (d) Kathleen McLean, 6257 Thorn Street, San Diego, CA 92115 (contact through
19 Responding Party's counsel); she took all photographs. Tiasha Brown took the video.

20 (e) Kathleen McLean, 6257 Thorn Street, San Diego, CA 92115 (contact through
21 Responding Party's counsel); she took all photographs. Tiasha Brown took the video.

22 **Form Interrogatory No. 12.5:**

23 Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any diagram, reproduction,
24 or model of any place or thing (except for items developed by expert witnesses covered by Code of
25 Civil Procedure sections 2034.210- 2034.31 0) concerning the INCIDENT? If so, for each item state:

26 (a) the type (i.e., diagram, reproduction, or model);

27 (b) the subject matter; and

28 (c) the name, ADDRESS, and telephone number of each PERSON who has it.

1 **Response to Form Interrogatory No. 12.5:**

2 No.

3 **Form Interrogatory No. 12.6:**

4 Was a report made by any PERSON concerning the INCIDENT? If so, state:

5 (a) the name, title, identification number, and employer of the PERSON who made the report;

6 (b) the date and type of report made;

7 (c) the name, ADDRESS, and telephone number of the PERSON for whom the report was
8 made; and

9 (d) the name, ADDRESS, and telephone number of each PERSON who has the original or a
10 copy of the report.

11 **Response to Form Interrogatory No. 12.6:**

12 Yes.

13 (a) Debbie Stiesmeyer, Lemon Grove Patrol Reporting Officer, Case # 17136885, Report
14 # 1716885.1.

15 (b) Report was made on 7/15/17 at 4:08a.m.

16 (c) Dr. Allison Haders, Alvarado Hospital.

17 (d) Responding Party (contact through counsel).

18 **Form Interrogatory No. 12.7:**

19 Have YOU OR ANYONE ACTING ON YOUR BEHALF inspected the scene of the
20 INCIDENT? If so, for each inspection state:

21 (a) the name, ADDRESS, and telephone number of the individual making the inspection (except
22 for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310); and

23 (b) the date of the inspection.

24 **Response to Form Interrogatory No. 12.7:**

25 No.

26 **Form Interrogatory No. 13.1:**

27 Have YOU OR ANYONE ACTING ON YOUR BEHALF conducted surveillance of any
28 individual involved in the INCIDENT or any party to this action? If so, for each surveillance

1 state:

2 (a) the name, ADDRESS, and telephone number of the individual or party;

3 (b) the time, date, and place of the surveillance;

4 (c) the name, ADDRESS, and telephone number of the individual who conducted the
5 surveillance; and

6 (d) the name, ADDRESS, and telephone number of each PERSON who has the original or a
7 copy of any surveillance photograph, film, or videotape.

8 **Response to Form Interrogatory No. 13.1:**

9 No.

10 **Form Interrogatory No. 13.2:**

11 Has a written report been prepared on the surveillance? If so, for each written report state:

12 (a) the title;

13 (b) the date;

14 (c) the name, ADDRESS, and telephone number of the individual who prepared the report; and

15 (d) the name, ADDRESS, and telephone number of each PERSON who has the original or a
16 copy.

17 **Response to Form Interrogatory No. 13.2:**

18 N/A.

19 **Form Interrogatory No. 14.1:**

20 Do YOU OR ANYONE ACTING ON YOUR BEHALF contend that any PERSON involved
21 in the INCIDENT violated any statute, ordinance, or regulation and that the violation was a legal
22 (proximate) cause of the INCIDENT? If so, identify the name, ADDRESS, and telephone number of
23 each PERSON and the statute, ordinance, or regulation that was violated.

24 **Response to Form Interrogatory No. 14.1:**

25 Objection: This form interrogatory violates the attorney work-product privilege.

26 **Form Interrogatory No. 14.2:**

27 Was any PERSON cited or charged with a violation of any statute, ordinance, or regulation as
28 a result of this INCIDENT? If so, for each PERSON state:

- 1 (a) the name, ADDRESS, and telephone number of the PERSON;
2 (b) the statute, ordinance, or regulation allegedly violated;
3 (c) whether the PERSON entered a plea in response to the citation or charge and, if so, the plea
4 entered; and
5 (d) the name and ADDRESS of the court or administrative agency, names of the parties, and
6 case number.

7 **Response to Form Interrogatory No. 14.2:**

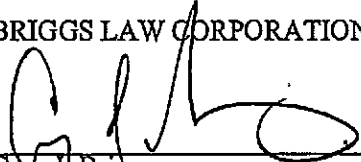
8 Unknown.

9 Date: August 13, 2018.

Respectfully submitted,

BRIGGS LAW CORPORATION

11
12 By:


Cory J. Briggs

Attorneys for Plaintiff Christopher Williams

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I have read the foregoing Response to Form Interrogatories (Set One)

and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on August 14, 20 18, at San Diego, California.

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

Christopher Williams Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of State of California. I am over the age of 18 and not a party to the within action; my business address is,

On , 20 , I served the foregoing document described as

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list; by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL I deposited such envelope in the mail at California. The envelope was mailed with postage thereon fully prepaid.

As follows I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motinn of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than nne day after date of deposit for mailing in affidavit.

Executed on , 20 , at California. (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on , 20 , at California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I (Federal) declara that I am employed in the office of a member of the bar nf this court at whose direction the service was made.

Type or Print Name

Signature

(By MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG) (FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

PROOF OF SERVICE

- 1. My name is Montca Manriquez. I am over the age of eighteen. I am employed in the State of California, County of San Diego.
- 2. My business residence address is Briggs Law Corporation, 4891 Pacific Highway, Suite 104, San Diego, CA 92110
- 3. On August 14, 2018, I served an original copy a true and correct copy of the following documents: Plaintiff Christopher Williams' Responses to Defendant David Arambula's Form Interrogatories (Set One)

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 San Diego, 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 14, 2018

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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Attorneys for Defendant DAVID ARAMBULA

EXHIBIT 3

1 BRIGGS LAW CORPORATION [FILE: 1939.00]
Cory J. Briggs (State Bar no. 176284)
2 Anthony N. Kim (State Bar no. 283353)
99 East "C" Street, Suite 111
3 Upland, CA 91786
Telephone: 909-949-7115

4 Attorneys for Plaintiff Christopher Williams
5
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN DIEGO – HALL OF JUSTICE
10

11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 vs.

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

15 Defendants.
16

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

PLAINTIFF, CHRISTOPHER WILLIAM'S RESPONSES TO DEFENDANT CITY OF LEMON GROVE'S FORM INTERROGATORIES (SET ONE)

17 PROPOUNDING PARTY: CITY OF LEMON GROVE

18 RESPONDING PARTY: CHRISTOPHER WILLIAMS

19 SET NUMBER: ONE

20 Plaintiff, Christopher Williams ("Responding Party"), responds as follows to the above-
21 identified Form Interrogatories from Defendant City of Lemon Grove ("Propounding Party").

22 **Preliminary Statement**

23 Responding Party has not completed discovery in this action and has not completed preparation
24 for trial. Accordingly, all of the responses contained herein are based only upon such information and
25 documents that are presently available to, and specifically known by, Responding Party and disclose
26 only those contentions which presently occur to Responding Party. It is anticipated that further
27 discovery and analysis will supply additional facts, add meaning to known facts, as well as establish
28 entirely new factual conclusions and legal contentions, all of which may lead to substantial additions

1 to, changes in, and variations from, the responses set forth herein. The following responses are given
2 without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact
3 or facts which Responding Party may later recall. Responding Party accordingly reserves the right to
4 supplement any and all responses herein as additional facts are ascertained, analyses are made, legal
5 research is completed, and contentions are investigated.

6 The responses contained herein are made in a good-faith effort to supply as much factual
7 information and as much specification of legal contentions as is presently known, but should in no way
8 be to the prejudice of Responding Party in relation to further discovery, research, analysis, or
9 presentation of evidence at trial.

10 These responses are made solely for the purpose of, and in relation to, this action. Each
11 response is given subject to all appropriate objections, including, but not limited to, objections
12 concerning competency, relevancy, materiality, propriety, and admissibility, which would require the
13 exclusion of any statement contained herein if the request were asked of, or any statement contained
14 herein were made by, a witness present and testifying in court. All such objections and grounds
15 therefore are reserved and may be interposed at the time of trial.

16 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
17 implied or inferred. The fact that a request herein has been responded to should not be taken as an
18 admission, or a concession of the existence of any facts set forth, or assumed by, such a request, or that
19 such response constitutes evidence of any facts thus set forth or assumed. All responses must be
20 construed as given on the basis of present recollection.

21 **Form Interrogatory No. 1.1:**

22 State the name, ADDRESS, telephone number, and relationship to you of each PERSON who
23 prepared or assisted in the preparation of the responses to these interrogatories.

24 **Response to Form Interrogatory No. 1.1:**

25 Christopher Williams (contacted through counsel); Briggs Law Corporation (address above).

26 **Form Interrogatory No. 2.1:**

27 State:

28 (a) your name;

1 (b) every name you have used in the past; and

2 (c) the dates you used each name.

3 **Response to Form Interrogatory No. 2.1:**

4 Christopher Williams

5 Christopher Stocker (used from 1988-1999 in school)

6 **Form Interrogatory No. 2.2:**

7 State the date and place of your birth.

8 **Response to Form Interrogatory No. 2.2:**

9 San Diego, CA

10 **Form Interrogatory No. 2.3:**

11 At the time of the INCIDENT, did you have a driver's license? If so state:

12 (a) the state or other issuing entity;

13 (b) the license number and type;

14 (c) the date of issuance; and

15 (d) all restrictions.

16 **Response to Form Interrogatory No. 2.3:**

17 Yes

18 (a) California

19 (b) Objection: This information is protected by Responding Party's right of privacy.

20 (c) February 19, 2016

21 (d) No.

22 **Form Interrogatory No. 2.4:**

23 At the time of the INCIDENT, did you have any other permit or license for the operation of a
24 motor vehicle? If so, state

25 (a) the state or other issuing entity;

26 (b) the license number and type;

27 (c) the date of issuance; and

28 (d) all restrictions.

1 **Response to Form Interrogatory No. 2.4:**

2 No.

3 **Form Interrogatory No. 2.5:**

4 State:

5 (a) your present residence ADDRESS;

6 (b) your residence ADDRESSES for the past five years; and

7 (c) the dates you lived at each ADDRESS.

8 **Response to Form Interrogatory No. 2.5:**

9 6257 Thorn Street, San Diego, CA 92115

10 **Form Interrogatory No. 2.6:**

11 State:

12 (a) the name, ADDRESS, and telephone number of your present employer or place of self-
13 employment; and

14 (b) the name, ADDRESS, dates of employment, job title, and nature of work for each employer
15 or self-employment you have had from five years before the INCIDENT until today.

16 **Response to Form Interrogatory No. 2.6:**

17 (a) Self-employed; Xperience Transportation, 7364 Mission Gorge Road, San Diego, CA 92120.

18 (b) Self-employed; Xperience Transportation, 7364 Mission Gorge Road, San Diego, CA 92120.

19 **Form Interrogatory No. 2.7:**

20 State:

21 (a) the name and ADDRESS of each school or other academic or vocational institution you have
22 attended, beginning with high school;

23 (b) the dates you attended;

24 (c) the highest grade level you have completed; and

25 (d) the degrees received.

26 **Response to Form Interrogatory No. 2.7:**

27 (a) Serra High School 1996;

28 (b) Patrick Henry 1997;

- 1 (c) Challenge 1998; and
2 (d) El Cajon Valley High School 1999.

3 **Form Interrogatory No. 2.8:**

4 Have you ever been convicted of a felony? If so, for each conviction state:

- 5 (a) the city and state where you were convicted;
6 (b) the date of conviction;
7 (c) the offense; and
8 (d) the court and case number.

9 **Response to Form Interrogatory No. 2.8:**

10 No.

11 **Form Interrogatory No. 2.9:**

12 Can you speak English with ease? If not, what language and dialect do you normally use?

13 **Response to Form Interrogatory No. 2.9:**

14 Yes.

15 **Form Interrogatory No. 2.10:**

16 Can you read and write English with ease? If not, what language and dialect do you normally
17 use?

18 **Response to Form Interrogatory No. 2.10:**

19 Yes.

20 **Form Interrogatory No. 2.11:**

21 At the time of the INCIDENT were you acting as an agent or employee for any PERSON? If
22 so, state:

- 23 (a) the name, ADDRESS, and telephone number of that PERSON; and
24 (b) a description of your duties.

25 **Response to Form Interrogatory No. 2.11:**

26 No.
27
28

1 **Form Interrogatory No. 2.12:**

2 At the time of the INCIDENT did you or any other person have any physical, emotional, or
3 mental disability or condition that may have contributed to the occurrence of the INCIDENT? If so, for
4 each person state:

5 (a) the name, ADDRESS, and telephone number;

6 (b) the nature of the disability or condition; and

7 (c) the manner in which the disability or condition contributed to the occurrence of the
8 INCIDENT.

9 **Response to Form Interrogatory No. 2.12:**

10 I did not. I do no personal knowledge of David Arambula's disability or condition.

11 **Form Interrogatory No. 2.13:**

12 Within 24 hours before the INCIDENT did you or any person involved in the INCIDENT use
13 or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of
14 any kind (prescription or not)? If so, for each person state:

15 (a) the name, ADDRESS, and telephone number;

16 (b) the nature or description of each substance;

17 (c) the quantity of each substance used or taken;

18 (d) the date and time of day when each substance was used or taken;

19 (e) the ADDRESS where each substance was used or taken;

20 (f) the name, ADDRESS, and telephone number of each person who was present when each
21 substance was used or taken; and

22 (g) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER who
23 prescribed or furnished the substance and the condition for which it was prescribed or furnished.

24 **Response to Form Interrogatory No. 2.13:**

25 Yes, I smoked one cannabis joint roughly 22 hours before the attack (just before going to bed
26 the on July 13, 2017).

27

28

1 **Form Interrogatory No. 4.1:**

2 At the time of the INCIDENT, was there in effect any policy of insurance through which you
3 were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage
4 or medical expense coverage) for the damages, claims, or actions that have arisen out of the
5 INCIDENT? If so, for each policy state:

6 (a) the kind of coverage;

7 (b) the name and ADDRESS of the insurance company;

8 (c) the name, ADDRESS, and telephone number of each named insured;

9 (d) the policy number;

10 (e) the limits of coverage for each type of coverage contained in the policy;

11 (f) whether any reservation of rights or controversy or coverage dispute exists between you and
12 the insurance company; and

13 (g) the name, ADDRESS, and telephone number of the custodian of the policy.

14 **Response to Form Interrogatory No. 4.1:**

15 No.

16 **Form Interrogatory No. 4.2:**

17 Are you self-insured under any statute for the damages, claims, or actions that have arising out
18 of the INCIDENT? If so, specify the statute.

19 **Response to Form Interrogatory No. 4.2:**

20 No.

21 **Form Interrogatory No. 6.1:**

22 Do you attribute any physical, mental, or emotional injuries to the INCIDENT?

23 **Response to Form Interrogatory No. 6.1:**

24 Yes. I have extreme stress and loss of sleep. I have feelings of shame, embarrassment, and
25 fright.

26 **Form Interrogatory No. 6.2:**

27 Identify each injury you attribute to the INCIDENT and the area of your body affected.
28

1 **Response to Form Interrogatory No. 6.2:**

2 See Responding Party's response to the accompanying special interrogatories.

3 **Form Interrogatory No. 6.3:**

4 Do you still have any complaints that you attribute to the INCIDENT? If so, for each complaint
5 state:

6 (a) a description;

7 (b) whether the complaint is subsiding, remaining the same, or becoming worse; and

8 (c) the frequency and duration.

9 **Response to Form Interrogatory No. 6.3:**

10 See Responding Party's response to the accompanying special interrogatories.

11 **Form Interrogatory No. 6.4:**

12 Did you receive any consultation or examination (except from expert witnesses covered by
13 Code of Civil Procedure sections 2034.210-2034.310) or treatment from a HEALTH CARE
14 PROVIDER for any injury you attribute to the INCIDENT? If so, for each HEALTH CARE
15 PROVIDER state:

16 (a) the name, ADDRESS, and telephone number;

17 (b) the type of consultation, examination, or treatment provided;

18 (c) the dates you received consultation, examination, or treatment; and

19 (d) the charges to date.

20 **Response to Form Interrogatory No. 6.4:**

21 Yes. See Responding Party's response to the accompanying special interrogatories.

22 **Form Interrogatory No. 6.5:**

23 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the
24 INCIDENT? If so, for each medication state:

25 (a) the name;

26 (b) the PERSON who prescribed or furnished it;

27 (c) the date it was prescribed or furnished;

28 (d) the dates you began and stopped taking it; and

1 (e) the cost to date.

2 **Response to Form Interrogatory No. 6.5:**

3 The doctors prescribed opioids for me when they treated my injuries following the attack. But
4 I did not take them.

5 **Form Interrogatory No. 6.6:**

6 Are there any other medical services necessitated by the injuries that you attribute to the
7 INCIDENT that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for
8 each service state:

9 (a) the nature;

10 (b) the date;

11 (c) the cost; and

12 (d) the name, ADDRESS, and telephone number of each provider.

13 **Response to Form Interrogatory No. 6.6:**

14 Unknown.

15 **Form Interrogatory No. 6.7:**

16 Has any HEALTH CARE PROVIDER advised that you may require future or additional
17 treatment for any injuries that you attribute to the INCIDENT? If so, for each injury state:

18 (a) the name and ADDRESS of each HEALTH CARE PROVIDER;

19 (b) the complaints for which the treatment was advised; and

20 (c) the nature, duration, and estimated cost of the treatment.

21 **Response to Form Interrogatory No. 6.7:**

22 See Responding Party's response to the accompanying special interrogatories.

23 **Form Interrogatory No. 7.1:**

24 Do you attribute any loss of or damage to a vehicle or other property to the INCIDENT? If so,
25 for each item of property:

26 (a) describe the property;

27 (b) describe the nature and location of the damage to the property;

28

1 (c) state the amount of damage you are claiming for each item of property and how the amount
2 was calculated; and

3 (d) if the property was sold, state the name, ADDRESS, and telephone number of the seller, the
4 date of sale, and the sale price.

5 **Response to Form Interrogatory No. 7.1:**

6 Only to the clothes I was wearing that night: shirt, pants, and shoes. My best estimate is that
7 my clothing that night cost \$300-\$400. There was no way to get the blood stains out of my clothing,
8 so they had to be thrown away. I also spent about \$200 to have blood stains removed from my car
9 seats.

10 **Form Interrogatory No. 7.2:**

11 Has a written estimate or evaluation been made for any item of property referred to in your
12 answer to the preceding interrogatory? If so, for each estimate or evaluation state:

13 (a) the name, ADDRESS, and telephone number of the PERSON who prepared it and the date
14 prepared;

15 (b) the name, ADDRESS, and telephone number of each PERSON who has a copy of it; and

16 (c) the amount of damage stated.

17 **Response to Form Interrogatory No. 7.2:**

18 No.

19 **Form Interrogatory No. 7.3:**

20 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so,
21 for each item state:

22 (a) the date repaired;

23 (b) a description of the repair;

24 (c) the repair cost;

25 (d) the name, ADDRESS, and telephone number of the PERSON who repaired it;

26 (e) the name, ADDRESS, and telephone number of the PERSON who paid for the repair.

27 **Response to Form Interrogatory No. 7.3:**

28 See the response to Form Interrogatory 7.1.

1 **Form Interrogatory No. 8.1:**

2 Do you attribute any loss of income or earning capacity to the INCIDENT?

3 **Response to Form Interrogatory No. 8.1:**

4 Yes.

5 **Form Interrogatory No. 8.2:**

6 State:

7 (a) the nature of your work;

8 (b) your job title at the time of the INCIDENT; and

9 (c) the date your employment began.

10 **Response to Form Interrogatory No. 8.2:**

11 For the last several years, I have been trying to obtain land-use approvals for medical-marijuana
12 dispensaries in the City of Lemon Grove. The City has become extraordinarily difficult and
13 unreceptive to my applications since Arambula attacked me and have put up illegal barriers by treating
14 me differently from other applicants presenting similar applications.

15 **Form Interrogatory No. 8.3:**

16 State the last date before the INCIDENT that you worked for compensation.

17 **Response to Form Interrogatory No. 8.3:**

18 July 14, 2017.

19 **Form Interrogatory No. 8.4:**

20 State your monthly income at the time of the INCIDENT and how the amount was calculated.

21 **Response to Form Interrogatory No. 8.4:**

22 Objection: This interrogatory violates Responding Party's right of privacy and is outside the
23 scope of permissible discovery. He is not claiming lost wages.

24 **Form Interrogatory No. 8.5:**

25 State the date you returned to work at each place of employment following the INCIDENT.

26 **Response to Form Interrogatory No. 8.5:**

27 August 1, 2017.

1 **Form Interrogatory No. 8.6:**

2 State the dates you did not work and for which you lost income as a result of the INCIDENT.

3 **Response to Form Interrogatory No. 8.6:**

4 See the response to Form Interrogatory no. 8.4.

5 **Form Interrogatory No. 8.7:**

6 State the total income you have lost to date as a result of the INCIDENT and how the amount
7 was calculated.

8 **Response to Form Interrogatory No. 8.7:**

9 See the response to Form Interrogatory no. 8.4.

10 **Form Interrogatory No. 8.8:**

11 Will you lose income in the future as a result of the INCIDENT? If so, state:

12 (a) the facts upon which you base this contention;

13 (b) an estimate of the amount;

14 (c) an estimate of how long you will be unable to work; and

15 (d) how the claim for future income is calculated.

16 **Response to Form Interrogatory No. 8.8:**

17 Unknown at this time.

18 **Form Interrogatory No. 9.1:**

19 Are there any other damages that you attribute to the INCIDENT? If so, for each item of
20 damage state:

21 (a) the nature;

22 (b) the date it occurred;

23 (c) the amount; and

24 (d) the name, ADDRESS, and telephone number of each PERSON to whom an obligation was
25 incurred.

26 **Response to Form Interrogatory No. 9.1:**

27 Yes. Pain and suffering, emotional distress, interference with economic opportunities through
28 retaliation in processing land-use applications by Propounding Party.

1 **Form Interrogatory No. 9.2:**

2 Do any DOCUMENTS support the existence or amount of any item of damages claimed in
3 interrogatory 9.1? If so, describe each document and state the name, ADDRESS, and telephone number
4 of the PERSON who has each DOCUMENT.

5 **Response to Form Interrogatory No. 9.2:**

6 All known documents, other than those already contained in Propounding Party's files at city
7 hall, will be produced with Responding Party's response to the accompanying request for production
8 of documents.

9 **Form Interrogatory No. 10.1:**

10 At any time before the INCIDENT did you have complaints or injuries that involved the same
11 part of your body claimed to have been injured in the INCIDENT? If so, for each state:

12 (a) a description of the complaint or injury;

13 (b) the dates it began and ended; and

14 (c) the name, ADDRESS, and telephone number of each HEALTH CARE PROVIDER whom
15 you consulted or who examined or treated you.

16 **Response to Form Interrogatory No. 10.1:**

17 No.

18 **Form Interrogatory No. 11.1:**

19 Except for this action, in the past 10 years have you filed an action or made a written claim or
20 demand for compensation for your personal injuries? If so, for each action, claim, or demand state:

21 (a) the date, time, and place and location (closest street ADDRESS or intersection) of the
22 INCIDENT giving rise to the action, claim, or demand;

23 (b) the name, ADDRESS, and telephone number of each PERSON against whom the claim or
24 demand was made or the action filed;

25 (c) the court, names of the parties, and case number of any action filed;

26 (d) the name, ADDRESS, and telephone number of any attorney representing you;

27 (e) whether the claim or action has been resolved or is pending; and

28 (f) a description of the injury.

1 **Response to Form Interrogatory No. 11.1:**

2 No.

3 **Form Interrogatory No. 11.2:**

4 In the past 10 years have you made a written claim or demand for workers' compensation
5 benefits? If so, for each claim or demand state:

6 (a) the date, time, and place of the INCIDENT giving rise to the claim;

7 (b) the name, ADDRESS, and telephone number of your employer at the time of the injury;

8 (c) the name, ADDRESS, and telephone number of the workers' compensation insurer and the
9 claim number;

10 (d) the period of time during which you received workers' compensation benefits;

11 (e) a description of the injury;

12 (f) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER who
13 provided services; and

14 (g) the case number at the Workers' Compensation Appeals Board.

15 **Form Interrogatory No. 11.2:**

16 No.

17 **Form Interrogatory No. 12.1:**

18 State the name, ADDRESS, and telephone number of each individual:

19 (a) who witnessed the INCIDENT or the events occurring immediately before and after the
20 INCIDENT;

21 (b) who made any statement at the scene of the INCIDENT;

22 (c) who heard any statements made about the INCIDENT by any individual at the scene; and

23 (d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of the
24 INCIDENT (except for expert witnesses covered by Code of Civil Procedure section 2034).

25 **Response to Form Interrogatory No. 12.1:**

26 INCIDENT

27 (a) Before Incident: Responding Party; Tiasha Brown 619-443-8989; Racquel Vasquez
28 phone number unknown; David Arambula.

1 (b) Responding Party, Tiasha Brown, Racquel Vasquez, and David Arambula made
2 statements at the place of the incident.

3 (c) Responding Party, Tiasha Brown, Racquel Vasquez, and David Arambula made
4 statements at the place of the incident.

5 (d) Responding Party, Tiasha Brown, David Arambula made statements about the incident.

6 (e) Kathleen McLean.

7 **Form Interrogatory No. 12.2:**

8 Have YOU OR ANYONE ACTING ON YOUR BEHALF interviewed any individual
9 concerning the INCIDENT? If so, for each individual state:

10 (a) the name, ADDRESS, and telephone number of the individual interviewed;

11 (b) the date of the interview; and

12 (c) the name, ADDRESS, and telephone number of the PERSON who conducted the interview.

13 **Response to Form Interrogatory No. 12.2:**

14 No.

15 **Form Interrogatory No. 12.3:**

16 Have YOU OR ANYONE ACTING ON YOUR BEHALF obtained a written or recorded
17 statement from any individual concerning the INCIDENT? If so, for each statement state:

18 (a) the name, ADDRESS, and telephone number of the individual from whom the statement was
19 obtained;

20 (b) the name, ADDRESS, and telephone number of the individual who obtained the statement;

21 (c) the date the statement was obtained; and

22 (d) the name, ADDRESS, and telephone number of each PERSON who has the original
23 statement or a copy.

24 **Response to Form Interrogatory No. 12.3:**

25 Yes. I received a video from Tiasha Brown showing David Arambula naked in his pool.
26
27
28

1 **Form Interrogatory No. 12.4:**

2 Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any photographs, films, or
3 videotapes depicting any place, object, or individual concerning the INCIDENT or plaintiffs injuries?

4 If so, state:

5 (a) the number of photographs or feet of film or videotape;

6 (b) the places, objects, or persons photographed, filmed, or videotaped;

7 (c) the date the photographs, films, or videotapes were taken;

8 (d) the name, ADDRESS, and telephone number of the individual taking the photographs, films,
9 or videotapes; and

10 (e) the name, ADDRESS, and telephone number of each PERSON who has the original or a
11 copy of the photographs, films, or videotapes.

12 **Response to Form Interrogatory No. 12.4:**

13 Yes.

14 (a) 36 pictures taken on July 15, 2017, and one 24-second video taken on July 14, 2017.

15 (b) Responding Party was photographed in all photos. David Arambula was videotaped in
16 his pool at his property in Lemon Grove.

17 (c) 36 pictures taken on July 15, 2017, and one 24-second video taken on July 14, 2017.

18 (d) Kathleen McLean, 6257 Thorn Street, San Diego, CA 92115 (contact through
19 Responding Party's counsel); she took all photographs. Tiasha Brown took the video.

20 (e) Kathleen McLean, 6257 Thorn Street, San Diego, CA 92115 (contact through
21 Responding Party's counsel); she took all photographs. Tiasha Brown took the video.

22 **Form Interrogatory No. 12.5:**

23 Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any diagram, reproduction,
24 or model of any place or thing (except for items developed by expert witnesses covered by Code of
25 Civil Procedure sections 2034.210- 2034.31 0) concerning the INCIDENT? If so, for each item state:

26 (a) the type (i.e., diagram, reproduction, or model);

27 (b) the subject matter; and

28 (c) the name, ADDRESS, and telephone number of each PERSON who has it.

1 **Response to Form Interrogatory No. 12.5:**

2 No.

3 **Form Interrogatory No. 12.6:**

4 Was a report made by any PERSON concerning the INCIDENT? If so, state:

5 (a) the name, title, identification number, and employer of the PERSON who made the report;

6 (b) the date and type of report made;

7 (c) the name, ADDRESS, and telephone number of the PERSON for whom the report was
8 made; and

9 (d) the name, ADDRESS, and telephone number of each PERSON who has the original or a
10 copy of the report.

11 **Response to Form Interrogatory No. 12.6:**

12 Yes.

13 (a) Debbie Stiesmeyer, Lemon Grove Patrol Reporting Officer, Case # 17136885, Report
14 # 1716885.1.

15 (b) Report was made on 7/15/17 at 4:08a.m.

16 (c) Dr. Allison Haders, Alvarado Hospital.

17 (d) Responding Party (contact through counsel).

18 **Form Interrogatory No. 12.7:**

19 Have YOU OR ANYONE ACTING ON YOUR BEHALF inspected the scene of the
20 INCIDENT? If so, for each inspection state:

21 (a) the name, ADDRESS, and telephone number of the individual making the inspection (except
22 for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310); and

23 (b) the date of the inspection.

24 **Response to Form Interrogatory No. 12.7:**

25 No.

26 **Form Interrogatory No. 13.1:**

27 Have YOU OR ANYONE ACTING ON YOUR BEHALF conducted surveillance of any
28 individual involved in the INCIDENT or any party to this action? If so, for each surveillance

1 state:

2 (a) the name, ADDRESS, and telephone number of the individual or party;

3 (b) the time, date, and place of the surveillance;

4 (c) the name, ADDRESS, and telephone number of the individual who conducted the
5 surveillance; and

6 (d) the name, ADDRESS, and telephone number of each PERSON who has the original or a
7 copy of any surveillance photograph, film, or videotape.

8 **Response to Form Interrogatory No. 13.1:**

9 No.

10 **Form Interrogatory No. 13.2:**

11 Has a written report been prepared on the surveillance? If so, for each written report state:

12 (a) the title;

13 (b) the date;

14 (c) the name, ADDRESS, and telephone number of the individual who prepared the report; and

15 (d) the name, ADDRESS, and telephone number of each PERSON who has the original or a
16 copy.

17 **Response to Form Interrogatory No. 13.2:**

18 N/A.

19 **Form Interrogatory No. 14.1:**

20 Do YOU OR ANYONE ACTING ON YOUR BEHALF contend that any PERSON involved
21 in the INCIDENT violated any statute, ordinance, or regulation and that the violation was a legal
22 (proximate) cause of the INCIDENT? If so, identify the name, ADDRESS, and telephone number of
23 each PERSON and the statute, ordinance, or regulation that was violated.

24 **Response to Form Interrogatory No. 14.1:**

25 Objection: This form interrogatory violates the attorney work-product privilege.

26 **Form Interrogatory No. 14.2:**

27 Was any PERSON cited or charged with a violation of any statute, ordinance, or regulation as
28 a result of this INCIDENT? If so, for each PERSON state:

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- (a) the name, ADDRESS, and telephone number of the PERSON;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the PERSON entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and ADDRESS of the court or administrative agency, names of the parties, and case number.

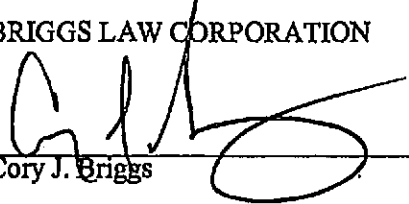
Response to Form Interrogatory No. 14.2:

Unknown.

Date: August 13, 2018.

Respectfully submitted,

BRIGGS LAW CORPORATION



By:

Cory J. Briggs

Attorneys for Plaintiff Christopher Williams

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I have read the foregoing Response to Form Interrogatories (Set One)

and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on August 14, 20 18, at San Diego, California.

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

Christopher Williams

Type or Print Name

Christopher Williams

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of State of California. I am over the age of 18 and not a party to the within action; my business address is,

On, 20, I served the foregoing document described as

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list: by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL I deposited such envelope in the mail at California.

The envelope was mailed with postage thereon fully prepaid. As follows I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on, 20, at California. (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on, 20, at California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I (Federal) declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

(By MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG) (FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

PROOF OF SERVICE

- 1. My name is Monica Manriquez. I am over the age of eighteen. I am employed in the State of California, County of San Diego.
- 2. My business _____ residence address is Briggs Law Corporation, 4891 Pacific Highway, Suite 104, San Diego, CA 92110
- 3. On August 14, 2018, I served _____ an original copy a true and correct copy of the following documents: Plaintiff Christopher Williams' Responses to Defendant City of Lemon Grove's Form Interrogatories (Set One)

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 San Diego, 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 14, 2018

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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Attorneys for Defendant DAVID ARAMBULA

EXHIBIT 4

1 BRIGGS LAW CORPORATION [FILE: 1939.00]
Cory J. Briggs (State Bar no. 176284)
2 Anthony N. Kim (State Bar no. 283353)
99 East "C" Street, Suite 111
3 Upland, CA 91786
Telephone: 909-949-7115

4 Attorneys for Plaintiff Christopher Williams
5

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

10
11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 vs.

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

15 Defendants.
16

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

PLAINTIFF, CHRISTOPHER
WILLIAM'S RESPONSES TO
DEFENDANT DAVID ARAMBULA'S
SPECIAL INTERROGATORIES (SET
ONE)

17 PROPOUNDING PARTY: DAVID ARAMBULA

18 RESPONDING PARTY: CHRISTOPHER WILLIAMS

19 SET NUMBER: ONE

20 Plaintiff, Christopher Williams ("Responding Party"), responds as follows to the above-
21 identified Special Interrogatories from Defendant David ARambula ("Propounding Party").

22 Preliminary Statement

23 Responding Party has not completed discovery in this action and has not completed preparation
24 for trial. Accordingly, all of the responses contained herein are based only upon such information and
25 documents that are presently available to, and specifically known by, Responding Party and disclose
26 only those contentions which presently occur to Responding Party. It is anticipated that further
27 discovery and analysis will supply additional facts, add meaning to known facts, as well as establish
28 entirely new factual conclusions and legal contentions, all of which may lead to substantial additions

1 to, changes in, and variations from, the responses set forth herein. The following responses are given
2 without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact
3 or facts which Responding Party may later recall. Responding Party accordingly reserves the right to
4 supplement any and all responses herein as additional facts are ascertained, analyses are made, legal
5 research is completed, and contentions are investigated.

6 The responses contained herein are made in a good-faith effort to supply as much factual
7 information and as much specification of legal contentions as is presently known, but should in no way
8 be to the prejudice of Responding Party in relation to further discovery, research, analysis, or
9 presentation of evidence at trial.

10 These responses are made solely for the purpose of, and in relation to, this action. Each
11 response is given subject to all appropriate objections, including, but not limited to, objections
12 concerning competency, relevancy, materiality, propriety, and admissibility, which would require the
13 exclusion of any statement contained herein if the request were asked of, or any statement contained
14 herein were made by, a witness present and testifying in court. All such objections and grounds
15 therefore are reserved and may be interposed at the time of trial.

16 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
17 implied or inferred. The fact that a request herein has been responded to should not be taken as an
18 admission, or a concession of the existence of any facts set forth, or assumed by, such a request, or that
19 such response constitutes evidence of any facts thus set forth or assumed. All responses must be
20 construed as given on the basis of present recollection.

21 **Special Interrogatory No. 1:**

22 Sate all the facts in support of YOUR contention Propounding Party contacted YOU to invite
23 YOU to a meeting.

24 **Response to Special Interrogatory No. 1:**

25 None. Responding Party's complaint erroneously identifies Propounding Party as the one who
26 invited Responding Party to the meeting.

1 **Special Interrogatory No. 2:**

2 IDENTIFY all occasions prior to the date of the MEETING when YOU spoke with
3 Propounding Party.

4 **Response to Special Interrogatory No. 2:**

5 I spoke to him on the evening he was sworn in to the Lemon Grove City Council. I said,
6 "Congratulations."

7 **Special Interrogatory No. 3:**

8 IDENTIFY the date of the MEETING.

9 **Response to Special Interrogatory No. 3:**

10 July 14, 2017.

11 **Special Interrogatory No. 4:**

12 IDENTIFY the time of day YOU arrived at Propounding Party's home for the MEETING.

13 **Response to Special Interrogatory No. 4:**

14 At or around 7:30 p.m.

15 **Special Interrogatory No. 5:**

16 Did YOU drive to the MEETING?

17 **Response to Special Interrogatory No. 5:**

18 Yes.

19 **Special Interrogatory No. 6:**

20 IDENTIFY the nature of YOUR relationship with Taisha Brown leading up to the time of the
21 MEETING.

22 **Response to Special Interrogatory No. 6:**

23 It is a business relationship.

24 **Special Interrogatory No. 7:**

25 IDENTIFY YOUR height as of the date of the MEETING.

26 **Response to Special Interrogatory No. 7:**

27 5'8"
28

1 **Special Interrogatory No. 8:**

2 IDENTIFY YOUR weight as of the date of the MEETING.

3 **Response to Special Interrogatory No. 8:**

4 135 pounds.

5 **Special Interrogatory No. 9:**

6 IDENTIFY the APPLICATIONS.

7 **Response to Special Interrogatory No. 9:**

8 My application for zoning clearance at 8260 Broadway Avenue, 6915-6935 North Avenue, and
9 2295 Lemon Grove Avenue in Lemon Grove.

10 **Special Interrogatory No. 10:**

11 IDENTIFY the status of the APPLICATIONS as of the date of the INCIDENT.

12 **Response to Special Interrogatory No. 10:**

13 8264 Broadway and 6915-6935 North: Both applications had been denied and each were up for
14 an appeal to Lemon Grove City Council. 2295 Lemon Grove Avenue: The application had not received
15 a response from Lemon Grove city staff.

16 **Special Interrogatory No. 11:**

17 State all facts in support of YOUR contention Propounding Party was not prepared to discuss
18 YOUR APPLICATIONS during the course of the MEETING.

19 **Response to Special Interrogatory No. 11:**

20 Initially he told me that he was dying of cancer. Eventually we discussed my applications. One
21 of the first things we talked about at his kitchen table was 8260 Broadway. We talked about Jennifer
22 Mendoza's relationship with the St. Johns of the Cross Church. We talked about the other applicant
23 who was applying within 1,000 feet of my property and the \$1,000 contribution he had made to
24 Propounding Party's campaign. At that point it became clear Propounding Party was not really
25 interested in talking about the applications and was more interested in talking about my giving him
26 money.

27

28

1 **Special Interrogatory No. 12:**

2 How many ounces of alcohol did you consume on the date of the MEETING prior to arriving
3 at the meeting?

4 **Response to Special Interrogatory No. 12:**

5 None.

6 **Special Interrogatory No. 13:**

7 How many ounces of alcohol did you consume while YOU were at Propounding Party's
8 residence prior to the time of the incident?

9 **Response to Special Interrogatory No. 13:**

10 Objection: This interrogatory is vague and uncertain because it does not define the term "you,"
11 which requires Responding Party to guess at the word's meaning, even though it also uses and defined
12 the word "YOU." Without waiving the objection, Responding Party provides the following response:
13 I brought a bottle of white wine with a screw top, which he joked about. I also brought a bottle of
14 champagne. We did not drink anything from either of those bottles. He did provide me with a brown
15 drink from his liquor cabinet, and he drank some too. I don't know how many ounces we drank. But
16 he was drunk when I arrived. I was were late and he had said he had "already started."

17 **Special Interrogatory No. 14:**

18 IDENTIFY the date of the INCIDENT

19 **Response to Special Interrogatory No. 14:**

20 July 15, 2017.

21 **Special Interrogatory No. 15:**

22 IDENTIFY the time of the INCIDENT.

23 **Response to Special Interrogatory No. 15:**

24 Approximately 12:00 a.m.

25 **Special Interrogatory No. 16:**

26 IDENTIFY the time of day YOU departed from Propounding Party's residence on the date of
27 the INCIDENT.

1 **Response to Special Interrogatory No. 16:**

2 Approximately 12:05 a.m. I left immediately after the incident.

3 **Special Interrogatory No. 17:**

4 IDENTIFY the location where YOU were immediately transported to upon departing
5 Propounding Party's residence following the INCIDENT.

6 **Response to Special Interrogatory No. 17:**

7 My residence.

8 **Special Interrogatory No. 18:**

9 IDENTIFY the PERSON(S) who transported YOU from Propounding Party's residence
10 following the INCIDENT.

11 **Response to Special Interrogatory No. 18:**

12 I drove myself. I intended to call a ride-sharing service, but when I was attacked I realized that
13 I needed to get away immediately for safety.

14 **Special Interrogatory No. 19:**

15 State all facts explaining YOUR reasoning for not calling 911 at the time of the INCIDENT.

16 **Response to Special Interrogatory No. 19:**

17 I was afraid for my safety and thought it was more important to get away from him than it was
18 to wait for the police to arrive.

19 **Special Interrogatory No. 20:**

20 State all facts in support of YOUR contention YOU did NOT initiate the INCIDENT.

21 **Response to Special Interrogatory No. 20:**

22 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
23 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
24 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
25 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.
26 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
27 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded
28 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large

1 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
2 asking him why he was doing that. He came behind me as I was on the ground and punched me over
3 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
4 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
5 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately bit
6 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
7 stop. I never once swung on him. He yelled get out and I left.

8 **Special Interrogatory No. 21:**

9 IDENTIFY any and all physical acts of force YOU displayed during the course of the
10 INCIDENT.

11 **Response to Special Interrogatory No. 21:**

12 See the response to Special Interrogatory No. 20.

13 **Special Interrogatory No. 22:**

14 IDENTIFY any and all physical acts of force Propounding Party displayed during the course
15 of the INCIDENT.

16 **Response to Special Interrogatory No. 22:**

17 See the response to Special Interrogatory No. 20.

18 **Special Interrogatory No. 23:**

19 State all facts in support of YOUR contention Propounding Party did not act in self defense
20 during the course of the INCIDENT.

21 **Response to Special Interrogatory No. 23:**

22 See the response to Special Interrogatory No. 20.

23 **Special Interrogatory No. 24:**

24 State all facts in support of YOUR contention Propounding Party acted with malice during the
25 course if the INCIDENT.

26 **Response to Special Interrogatory No. 24:**

27 See the response to Special Interrogatory No. 20. Furthermore, I had refused to go along with
28 his suggestion that I make a campaign donation.

1 **Special Interrogatory No. 25:**

2 State all facts in support of YOUR contention Propounding Party acted with oppression during
3 the course of the INCIDENT.

4 **Response to Special Interrogatory No. 25:**

5 See the response to Special Interrogatory No. 20. Furthermore, I had refused to go along with
6 his suggestion that I make a campaign donation.

7 **Special Interrogatory No. 26:**

8 State all facts in support of YOUR contention Propounding Party intended to cause YOU
9 emotional distress.

10 **Response to Special Interrogatory No. 26:**

11 See the response to Special Interrogatory No. 20. Furthermore, I had refused to go along with
12 his suggestion that I make a campaign donation.

13 **Special Interrogatory No. 27:**

14 IDENTIFY all of YOUR medical providers from July 14, 2012, to present.

15 **Response to Special Interrogatory No. 27:**

16 Objection: This interrogatory violates Responding Party's right of privacy and is outside the
17 scope of permissible discovery. Without waiving the objection, Responding Party provides the
18 following response: Alvarado Hospital 11/8/11 Christopher Dewar 314-601-1699; Alvarado Hospital
19 7/15/17 Alison Haders 310-379-2134.

20 **Special Interrogatory No. 28:**

21 IDENTIFY all of YOUR health insurance providers from July 14, 2017 to present.

22 **Response to Special Interrogatory No. 28:**

23 Objection: This interrogatory violates Responding Party's right of privacy and is outside the
24 scope of permissible discovery. Without waiving the objection, Responding Party provides the
25 following response: None.

26 **Special Interrogatory No. 29:**

27 IDENTIFY all of YOUR health insurance member identification numbers from July 14, 2017
28 to present.

1 **Response to Special Interrogatory No. 29:**

2 Objection: This interrogatory violates Responding Party's right of privacy and is outside the
3 scope of permissible discovery. Without waiving the objection, Responding Party provides the
4 following response: None.

5 **Special Interrogatory No. 30:**

6 IDENTIFY the amount YOU have paid out-of-pocket for YOUR INCIDENT-related medical
7 treatment.

8 **Response to Special Interrogatory No. 30:**

9 Nothing so far.

10 **Special Interrogatory No. 31:**

11 IDENTIFY all medical providers with whom YOU have treated on a lien basis for injuries YOU
12 attribute to the INCIDENT.

13 **Response to Special Interrogatory No. 31:**

14 Objection: This interrogatory is vague in its use of the term "lien basis," the meaning of which
15 Responding Party must guess at. Without waiving the objection, Responding Party provides the
16 following response: None.

17 **Special Interrogatory No. 32:**

18 IDENTIFY all post-INCIDENT activities YOU claim YOU can no longer perform as a result
19 of the INCIDENT.

20 **Response to Special Interrogatory No. 32:**

21 At this time there is nothing I could do after the attack that I can no longer do.

22 **Special Interrogatory No. 33:**

23 IDENTIFY all pre-INCIDENT activities YOU claim YOU can perform post-INCIDENT, but
24 now with difficulty.

25 **Response to Special Interrogatory No. 33:**

26 Unknown. I cannot afford to get further medical treatment.
27
28

1 **Special Interrogatory No. 34:**

2 IDENTIFY the total amount of INCIDENT-related disability benefits YOU have received from
3 the State of California, if any.

4 **Response to Special Interrogatory No. 34:**

5 None.

6 **Special Interrogatory No. 35:**

7 IDENTIFY the total amount of INCIDENT-related disability benefits YOU have received from
8 the federal government, if any.

9 **Response to Special Interrogatory No. 35:**

10 None.

11 Date: August 13, 2018.

Respectfully submitted,

BRIGGS LAW CORPORATION

12
13
14 By:


Cory J. Briggs

Attorneys for Plaintiff Christopher Williams

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I have read the foregoing Response to Special Interrogatories (Set One) and know its contents.

CHECK APPLICABLE PARAGRAPH

- I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true. I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

- I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on August 14, 20 18, at San Diego, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Christopher Williams Type or Print Name

Handwritten signature Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF I am employed in the county of State of California. I am over the age of 18 and not a party to the within action; my business address is,

On , 20 , I served the foregoing document described as

- by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list: by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

- BY MAIL I deposited such envelope in the mail at California. The envelope was mailed with postage thereon fully prepaid. As follows I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

- Executed on , 20 , at , California. (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee. Executed on , 20 , at , California. (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I (Federal) declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature (By MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG) (FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

PROOF OF SERVICE

1. My name is Monica Manriquez. I am over the age of eighteen. I am employed in the State of California, County of San Diego.

2. My business residence address is Briggs Law Corporation, 4891 Pacific Highway, Suite 104, San Diego, CA 92110

3. On August 14, 2018, I served an original copy a true and correct copy of the following documents: Plaintiff Christopher Williams' Responses to Defendant David Arambula's Special Interrogatories (Set One)

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 San Diego, California.

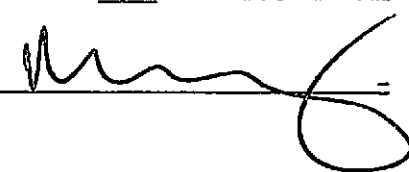
by overnight delivery. I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized 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 14, 2018

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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EXHIBIT 5

1 BRIGGS LAW CORPORATION [FILE: 1939.00]
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2 Anthony N. Kim (State Bar no. 283353)
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3 Upland, CA 91786
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4 Attorneys for Plaintiff Christopher Williams
5

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

10
11 CHRISTOPHER WILLIAMS,

12 Plaintiff,

13 vs.

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

15 Defendants.
16

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

SUPPLEMENTAL RESPONSES OF
PLAINTIFF CHRISTOPHER WILLIAMS
TO DEFENDANT DAVID ARAMBULA'S
SPECIAL INTERROGATORIES (SET
ONE)

17 PROPOUNDING PARTY: DAVID ARAMBULA

18 RESPONDING PARTY: CHRISTOPHER WILLIAMS

19 SET NUMBER: ONE

20 Plaintiff Christopher Williams ("Responding Party") supplementally responds as follows to the
21 above-identified Special Interrogatories from Defendant David ARambula ("Propounding Party").

22 Preliminary Statement

23 Responding Party has not completed discovery in this action and has not completed preparation
24 for trial. Accordingly, all of the responses contained herein are based only upon such information and
25 documents that are presently available to, and specifically known by, Responding Party and disclose
26 only those contentions which presently occur to Responding Party. It is anticipated that further
27 discovery and analysis will supply additional facts, add meaning to known facts, as well as establish
28 entirely new factual conclusions and legal contentions, all of which may lead to substantial additions

1 to, changes in, and variations from, the responses set forth herein. The following responses are given
2 without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact
3 or facts which Responding Party may later recall. Responding Party accordingly reserves the right to
4 supplement any and all responses herein as additional facts are ascertained, analyses are made, legal
5 research is completed, and contentions are investigated.

6 The responses contained herein are made in a good-faith effort to supply as much factual
7 information and as much specification of legal contentions as is presently known, but should in no way
8 be to the prejudice of Responding Party in relation to further discovery, research, analysis, or
9 presentation of evidence at trial.

10 These responses are made solely for the purpose of, and in relation to, this action. Each
11 response is given subject to all appropriate objections, including, but not limited to, objections
12 concerning competency, relevancy, materiality, propriety, and admissibility, which would require the
13 exclusion of any statement contained herein if the request were asked of, or any statement contained
14 herein were made by, a witness present and testifying in court. All such objections and grounds
15 therefore are reserved and may be interposed at the time of trial.

16 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
17 implied or inferred. The fact that a request herein has been responded to should not be taken as an
18 admission, or a concession of the existence of any facts set forth, or assumed by, such a request, or that
19 such response constitutes evidence of any facts thus set forth or assumed. All responses must be
20 construed as given on the basis of present recollection.

21 **Special Interrogatory No. 21:**

22 IDENTIFY any and all physical acts of force YOU displayed during the course of the
23 INCIDENT.

24 **Response to Special Interrogatory No. 21:**

25 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
26 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
27 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
28 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.

1 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
2 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded
3 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large
4 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
5 asking him why he was doing that. He came behind me as I was on the ground and punched me over
6 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
7 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
8 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately bit
9 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
10 stop. I never once swung on him. He yelled get out and I left.

11 Special Interrogatory No. 22:

12 IDENTIFY any and all physical acts of force Propounding Party displayed during the course
13 of the INCIDENT.

14 Response to Special Interrogatory No. 22:

15 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
16 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
17 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
18 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.
19 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
20 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded
21 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large
22 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
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24 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
25 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
26 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately bit
27 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
28 stop. I never once swung on him. He yelled get out and I left.

1 **Special Interrogatory No. 23:**

2 State all facts in support of YOUR contention Propounding Party did not act in self defense
3 during the course of the INCIDENT.

4 **Response to Special Interrogatory No. 23:**

5 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
6 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
7 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
8 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.
9 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
10 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded
11 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large
12 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
13 asking him why he was doing that. He came behind me as I was on the ground and punched me over
14 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
15 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
16 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately bit
17 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
18 stop. I never once swung on him. He yelled get out and I left.

19 **Special Interrogatory No. 24:**

20 State all facts in support of YOUR contention Propounding Party acted with malice during the
21 course if the INCIDENT.

22 **Response to Special Interrogatory No. 24:**

23 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
24 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
25 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
26 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.
27 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
28 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded

1 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large
2 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
3 asking him why he was doing that. He came behind me as I was on the ground and punched me over
4 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
5 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
6 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately bit
7 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
8 stop. I never once swung on him. He yelled get out and I left.

9 Furthermore, I had refused to go along with his suggestion that I make a campaign donation.

10 **Special Interrogatory No. 25:**

11 State all facts in support of YOUR contention Propounding Party acted with oppression during
12 the course of the INCIDENT.

13 **Response to Special Interrogatory No. 25:**

14 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
15 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
16 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
17 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.
18 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
19 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded
20 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large
21 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
22 asking him why he was doing that. He came behind me as I was on the ground and punched me over
23 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
24 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
25 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately bit
26 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
27 stop. I never once swung on him. He yelled get out and I left.

28 Furthermore, I had refused to go along with his suggestion that I make a campaign donation.

1 **Special Interrogatory No. 26:**

2 State all facts in support of YOUR contention Propounding Party intended to cause YOU
3 emotional distress.

4 **Response to Special Interrogatory No. 26:**

5 We were having a fine night until he had gotten into the pool naked. When the mayor, Tiasha,
6 and I didn't jump in too he became embarrassed. The ladies were giggling and making comments about
7 the size of his penis. Shortly after he got out of the pool he threw a glass at the wall in his home. The
8 mayor, Tiasha, and I cleaned it up and knew it was time to go. Shortly after we all walked out together.
9 I realized I left my phone inside when I went to hire the ride-sharing app. I then went back to his home
10 and knocked on the door. He answered the door, was on the phone, and let me in. I then proceeded
11 to get my phone. As I reached for my phone he completely lost it. He hit me in the head with a large
12 bottle. I ended up on my hands and knees stunned, and it took me a second or two to come to. I started
13 asking him why he was doing that. He came behind me as I was on the ground and punched me over
14 and over. As I was trying to get up, he put me in a choke hold. At that point my adrenaline kicked in
15 and I thought I was going to die. I rose a little from a crouched position and pulled him over my
16 shoulder as he was off balance. I then had him in a choke hold to restrain him. He immediately hit
17 both my forearms. The second bite was much worse, and I screamed. It was my scream that made him
18 stop. I never once swung on him. He yelled get out and I left.

19 Furthermore, I had refused to go along with his suggestion that I make a campaign donation.

20 **Special Interrogatory No. 33:**

21 IDENTIFY all pre-INCIDENT activities YOU claim YOU can perform post-INCIDENT, but
22 now with difficulty.

23 **Response to Special Interrogatory No. 33:**

24 Objection: This special interrogatory calls for expert testimony. Without waiving the objection:
25 Responding Party does not know "all" such activities because he cannot afford to get further medical
26 treatment. As a lay person, Responding is unaware of any such activities.
27
28

1 Date: September 26, 2018.

2 Respectfully submitted,
3 BRIGGS LAW CORPORATION

4 *Original Signed*

5 By: _____
6 Cory J. Briggs
7 Attorneys for Plaintiff Christopher Williams
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VERIFICATION

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO Special

I have read the foregoing Supplemental Response to Form Interrogatories (Set One)

and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on September 26, 20 18, at San Diego, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Christopher Williams

Type or Print Name

Christopher Williams

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of, State of California.

I am over the age of 18 and not a party to the within action; my business address is,

On, 20, I served the foregoing document described as

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list: by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL I deposited such envelope in the mail at, California. The envelope was mailed with postage thereon fully prepaid.

As follows I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on, 20, at, California. (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on, 20, at, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I (Federal) declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

(By MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG)

(FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

PROOF OF SERVICE

1. My name is Monica Manriquez. I am over the age of eighteen. I am employed in the State of California, County of San Diego.

2. My business _____ residence address is Briggs Law Corporation, 4891 Pacific Highway, Suite 104, San Diego, CA 92110

3. On September 27, 2018, I served _____ an original copy a true and correct copy of the following documents: Supplemental Responses of Plaintiff, Christopher Williams to Defendant David Arambula's Special Interrogatories (Set One)

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 San Diego, California.

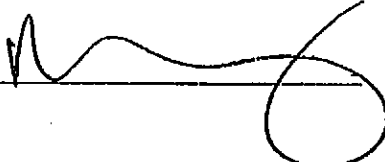
by overnight delivery. I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized 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: September 27, 2018

Signature: 

SERVICE LIST

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

Kimberly S. Oberrecht
Heidi K. Williams
HORTON, OBERRECHT, KIRKPATRICK
& MARTHA
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San Diego, California 92101
Telephone: (619) 232-1183
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GROVE*

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estraub@tysonmendes.com

Attorneys for Defendant DAVID ARAMBULA

EXHIBIT 6

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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.)	

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

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

1 a glass at the wall, if you know?

2 A. No.

3 Q. Did he say anything like --

4 A. He was drunk.

5 Q. How do you know he was drunk?

6 A. You know.

7 Q. Huh?

8 A. I said you know when someone is drunk.

9 Q. How do you know?

10 A. Well, they start to slur a little bit,

11 they get little wobbly, you know, maybe comments

12 that, you know, would come out maybe a little

13 harsh or maybe a little too direct that you can't

14 imagine a grown man saying when he's sober.

15 Q. Okay. So did any comments come out of

16 Mr. Arambula's mouth that night that were a little

17 bit too direct and not something you would imagine

18 coming out of a grown man's mouth?

19 A. I mean --

20 Q. I'm just asking if he met that criteria?

21 A. Yeah, I'm trying to answer them best

22 without embarrassing people. But I wouldn't

23 normally ask people to join me in a pool naked.

24 Q. Okay.

25 MR. BRIGGS: You mean when you're sober

1 or --

2 A. Sober or drinking I'll probably avoid
3 getting into a pool without my clothes on.

4 BY MS. STRAUB:

5 Q. He asked you to throw him in the pool
6 naked?

7 A. No.

8 Q. What did he ask you?

9 A. He asked us to join him in the pool.

10 Q. And to be naked?

11 A. Yeah.

12 Q. Other than that comment, were there any
13 other comments that meet the criteria you're
14 mentioning of being what you consider to be drunk?

15 A. I mean, he made comments, you know,
16 sexual innuendos and things of that nature.

17 Q. Give me examples please?

18 A. Like are you going to stay the night.

19 Q. To who?

20 A. To Taisha Brown.

21 Q. What made you think that was a sexual
22 innuendo?

23 A. Again, you can tell. At least, you
24 know, I can. I'm not here to try to embarrass
25 anyone, but you can tell.

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3

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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3
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 15 day of Feb 2019, at
12 San Diego, CA
13 (city) (state)

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17 
18
19 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
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234	24	Kathleen's parents and sisters
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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.

~~_____~~

~~_____~~

239	8	Jill went back to the hotel. Kathleen and
-----	---	---

		Mac were the only two awake
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254	20	Joanna Cary
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**Please turn to back of transcript and
sign the Penalty of Perjury page.**

EXHIBIT 7

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 agreement had been reached; correct?

2 A. No.

3 Q. So when you say I thought the deal was
4 closed, I guess what do you think had been -- did
5 you think anything else had been accomplished
6 other than you told me you thought you did a good
7 job explaining at the meeting why they made a bad
8 decision. Did you think anything else had been
9 accomplished besides that?

10 A. That was the whole point of the
11 discussions.

12 Q. Okay. And after the discussions ceased
13 were you guys then just partying, is that what you
14 were doing?

15 A. Discussions never ceased until the end
16 of the night. When you're in a meeting and you're
17 trying to portray what the appeals are, that I'm a
18 good person, all that good stuff, just ongoing
19 meeting, business meeting until it ends.

20 Q. You would agree there was no discussions
21 going on while you guys were dancing or was there?

22 A. Were there discussions specifically
23 while we were dancing?

24 Q. Yeah.

25 A. Not that I can recall.

(1) (Q.) (Okay.) (And after the dancing were there

(2) (discussions?)

(3) (A.) (Well, it was a little awkward after the

(4) (dancing finished.)

(5) (Q.) (Why?)

(6) (A.) (Because David Arambula got into the pool

(7) (naked.)

(8) (Q.) (Okay.) (But my question is was there any

(9) (discussions about the medical marijuana dispensary)

(10) (after the dancing?)

(11) (A.) (After he got into the pool naked or

(12) (after the dancing?)

(13) (Q.) (Both.)

(14) (A.) (No.) (We pretty much know that it's about

(15) (time for the party to end when someone gets into

(16) (the pool naked.)

(17) (Q.) (So I want to back up.) (From the time

(18) (that the dancing stops until Mr. Arambula goes

(19) (into the pool naked how much time goes by?)

(20) (A.) (They were pretty close in time together

(21) (the dancing part.)

(22) (Q.) (Okay.)

(23) (A.) (So he took the dancing above and beyond

(24) (and decided to get in the pool.)

(25) (Q.) (Was it pretty much immediately after?)

(1) A.) (Pretty much immediately right around
(2) that time, yes.)

(3) Q.) (Okay.) (So my question of was there any
(4) discussions about the medical marijuana
(5) dispensaries -- strike that.)

(6) (It wasn't medical, I keep saying that.)

(7) Was there any discussion about the marijuana
(8) dispensaries from the time the dancing started to
(9) the time the night ended, there were no
(10) discussions; correct?

(11) A.) (Of specifically -- just want to be clear
(12) for the record.) (Are you talking about specific
(13) discussions while someone is dancing in the pool
(14) or while someone is moving to music?)

(15) Q.) (No.) (From the time the dancing started
(16) until the time of the incident, was there any
(17) discussions about the marijuana dispensary by
(18) anybody?)

(19) A.) (Up until the dancing which was pretty
(20) short there was discussions here and there.)

(21) Q.) (Hang on.) (Move to strike.) (Respectfully
(22) that's not what I'm asking.)

(23) A.) (No problem.)

(24) Q.) (I'm asking you from the time the dancing
(25) started until the time of the incident, was there

1) any discussions about marijuana dispensaries by

2) anybody?

3) A. After.

4) Q. After what?

5) A. While we were walking out.

6 Q. Who was walking out?

7 A. We all left about the same time, Taisha,
8 the mayor and myself.

9 Q. What discussions were said at that time?

10 A. I can't recall the exact discussions.

11 Q. What did you say and to whom?

12 A. I can't recall the exact discussions
13 because we were at the point in time leaving from
14 a awkward situation just saying good time, good
15 night.

16 Q. You might not remember exactly, but just
17 in general do you remember what you said to
18 anybody at that time?

19 A. Had a good time, I thought it was
20 productive.

21 Q. Okay. Did you say anything specific
22 about the dispensaries?

23 A. Not that I can recall.

24 Q. Okay. What did Ms. Brown say, if
25 anything, about the dispensary issues at that

Christopher Williams, Volume 2 9/24/2019

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Declaration Under Penalty of Perjury

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

Executed this ____ day of ____ 20__, at

_____.

(City)

(state)

CHRISTOPHER WILLIAMS

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3

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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EXHIBIT 8

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) CU-PO-CTL

7 Plaintiff,)

8)

9 v.)

10)

11 DAVID ARAMBULA, CITY OF)

12 LEMON GROVE, and DOES 1)

13 through 1,000,)

14)

15)

16 Defendants.)

17)

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19

20 VIDEOTAPED DEPOSITION OF DAVID ARAMBULA

21 San Diego, California

22 October 26, 2018

23

24

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26 REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

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1 Q. Okay. I'm going to make it Exhibit 3 to
2 the deposition. I'm going to play the video for
3 you. You want to tell me whether any of this
4 refreshes your recollection about the evening.

5 (WHEREUPON, THE ABOVE-MENTIONED DOCUMENT
6 WAS MARKED AS EXHIBIT NO. 3 TO THE TESTIMONY OF
7 THE WITNESS AND IS ATTACHED.)

8 (VIDEO BEING PLAYED.)

9 BY MR. BRIGGS:

10 (Q) You're not naked in that video?

11 (A) No.

12 Q. Was it your birthday?

13 A. No.

14 Q. You have any idea why Ms. Brown was
15 wanting you to show her the 10 inches?

16 A. No idea.

17 Q. Have you talked to her about the video?

18 A. I have not.

19 Q. Have you talked to her since the
20 incident?

21 A. I have.

22 Q. You talked to her just a few minutes
23 after when you called her about Mr. Williams;
24 right?

25 A. Correct.

1 Q. Since then have you talked to her?

2 A. I have.

3 Q. About this incident?

4 A. No.

5 Q. What did you talk to her about? I mean,
6 what's your relationship with her?

7 A. So she's the vice chair within the
8 Central Committee for the Democratic Party. She
9 goes to events that I go to. Often times we just
10 talk about the candidates. We talk about
11 fundraising. We talk about different things.

12 Q. Were you drunk in this video?

13 A. I was not.

14 Q. At one point you were swinging your arms
15 round, right, like you're dancing?

16 A. Yes. As the video shows.

17 Q. Why?

18 A. Because music was on.

19 Q. So you were having fun?

20 A. At this particular moment, yes.

21 Q. At what particular moment was this video
22 taken?

23 A. I don't recall.

24 Q. How long after Mr. Williams got there
25 was it taken?

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3

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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19 Bobbie Hibbler, CSR No. 12475

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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.	
29	3	(951) 541-5091
64	16	No and I don't recall when I got rid of it.
101	-	"Arambula"

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

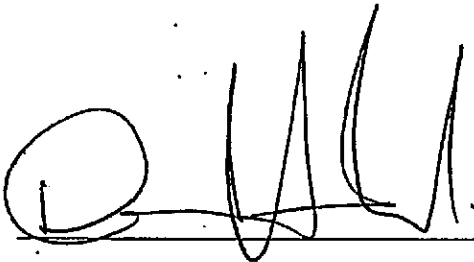
David Arambula, 10/26/2018

1 Declaration Under Penalty of Perjury

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Arambula
I, DAVID ~~ARUMBULA~~, the witness herein,
declare under penalty of perjury that I have read
the foregoing in its entirety; and that the
testimony contained therein, as corrected by me,
is a true and accurate transcription of my
testimony elicited at said time and place.

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



DAVID ARAMBULA

EXHIBIT 9

Racquel Vasquez 11/30/2018

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 RACQUEL VASQUEZ

San Diego, California

November 30, 2018

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

1 Q. Do you recall anything like that?

2 A. No.

3 Q. I'm going to play a video for you.

4 MS. WILLIAMS: Are you able to see the

5 screen?

6 MR. BRIGGS: I'm really more interested

7 in --

8 THE WITNESS: Are you okay with me

9 pushing --

10 MR. BRIGGS: It's fine.

11 (VIDEO IS PLAYED FOR THE WITNESS.)

12 BY MR. BRIGGS:

13 Q. Do you remember any of what's captured

14 on that video?

15 A. No.

16 Q. Let's play it again. I want you to

17 listen to the very beginning. There's a voice

18 that says "don't do that." Tell me when you

19 recognize the voice.

20 (VIDEO PLAYED.)

21 A. I don't know who that is. No.

22 BY MR. BRIGGS:

23 Q. That's not you saying don't do that?

24 A. No.

25 Q. Is that you hollering on the video?

1 A. No.

2 Q. Do you recall him telling Ms. Brown to
3 turn that thing off? Do you recall any of the
4 exchange that you just heard on that video?

5 MS. WILLIAMS: Asked and answered.

6 A. No.

7 (VIDEO PLAYED.)

8 MS. WILLIAMS: I don't think there's a
9 question pending. Did you ask her to watch it
10 again?

11 BY MR. BRIGGS:

12 Q. You don't recall any part of what
13 transpired on that video?

14 MS. WILLIAMS: Asked and answered.

15 A. No.

16 BY MR. BRIGGS:

17 Q. Have you ever seen Mr. Arambula naked?

18 MS. WILLIAMS: Objection.

19 A. No.

20 MS. WILLIAMS: Harassing the witness.

21 BY MR. BRIGGS:

22 Q. I'm trying to figure out --

23 A. Let me put this on the record. I have
24 never seen David Arambula naked.

25 Q. Okay. When is the first time you saw

1 Declaration Under Penalty of Perjury

2

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4 I, RACQUEL VASQUEZ, 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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RACQUEL VASQUEZ

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1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

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

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

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

22 In witness whereof, I have hereunto
23 set my hand this _____ day of _____ 20__.

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Bobbie Hibbler, CSR No. 12475

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Page 6

EXHIBIT 10

Manuel Ortiz 2/18/2019

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO - CENTRAL DIVISION

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

VIDEOTAPED DEPOSITION OF MANUEL ORTIZ
SAN DIEGO, CALIFORNIA
FEBRUARY 18, 2019

REPORTED BY: Kathryn L. Edwards, CSR No. 7288

1 A No.

2 Q When you were leaving with your guests
3 late that evening and you saw the three people
4 leaving Mr. Arambula's house, at the closest point
5 between you and the guests, how many feet apart were
6 you?

7 A Probably from me to you.

8 Q Okay. Six feet? Five feet?

9 A It looks more like we're three feet away.

10 Q Okay.

11 A Four feet away.

12 Q Okay. Fair enough. You can tell that's
13 why I'm a lawyer and not a contractor, somebody who
14 needs a measuring tape.

15 A That's fine.

16 Q When you saw the people leaving, did you
17 ever see anybody go back towards Mr. Arambula's
18 house after you saw them leaving?

19 A I don't remember.

20 Q Okay. I want to show you a video. I'd
21 like to know whether any of it looks familiar to
22 you.

23 THE COURT REPORTER: Off the record for a
24 moment.

25 MR. BRIGGS: Sure.

1 THE VIDEOGRAPHER: Off the record. The
2 time is 10:45 a.m.

3 (Discussion off the record.)

4 THE VIDEOGRAPHER: Back on the record.
5 The time is 10:46 a.m.

6 BY MR. BRIGGS:

7 Q The court reporter won't be transcribing
8 the audio from the video, but if you could just tell
9 me whether you recognize any portion of this video.

10 (Video playing.)

11 A No.

12 Q Does any of that sound familiar to you?

13 A No.

14 Q Do you know whether July 14th was David
15 Arambula's birthday?

16 A No.

17 Q Have you ever known Mr. Arambula to be
18 skinny dipping in his pool?

19 A No.

20 Q Did you ever see him drunk?

21 A No.

22 MR. BRIGGS: Okay. I don't have any
23 further questions.

24 THE WITNESS: If I would have known that,
25 I would never be in the pool or in -- in there, you

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Declaration Under Penalty of Perjury

I, MANUEL ORTIZ, the witness herein,
declare under penalty of perjury that I have read
the foregoing in its entirety; and that the
testimony contained therein, as corrected by me, is
a true and accurate transcription of my testimony
elicited at said time and place.

Executed this ____ day of _____ 20__,
at _____,
(city) (state)

MANUEL ORTIZ

Manuel Ortiz, 2/18/2019

1 Declaration Under Penalty of Perjury

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I, MANUEL ORTIZ, the witness herein,
declare under penalty of perjury that I have read
the foregoing in its entirety; and that the
testimony contained therein, as corrected by me, is
a true and accurate transcription of my testimony
elicited at said time and place.

Executed this 16 day of APRIL 2019,
at Lemon Grove, CA
(city) (state)



MANUEL ORTIZ

EXHIBIT 11

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO - CENTRAL DIVISION

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

VIDEOTAPED DEPOSITION OF TAISHA BROWN
SAN DIEGO, CALIFORNIA
MARCH 26, 2019

REPORTED BY AMANDA NOEL MARCOS, CSR NO. 13965

1 about the content of that binder as it was described to
2 you?

3 A It was white. That's it.

4 Q That's it?

5 A Uh-huh.

6 Q All right. Okay. So other than that
7 conversation, did you overhear Mr. Arambula speak with
8 anyone else that evening?

9 A Well, Racquel came. By then we were out kind
10 of -- I had been sitting outside when they were inside.
11 And then we all ended up outside at some point. And I
12 don't remember. It was a lot of laughing and giggling
13 at that point. I don't remember any full conversations.

14 Q All right. Fair enough. Did you at any point
15 observe Mr. Arambula get in the pool that evening?

16 A Yes, I did.

17 Q How many times?

18 A Once.

19 Q Once. Anyone else get in the pool that
20 evening?

21 A No.

(22) Q Did you observe anyone go skinny dipping that
(23) evening?

(24) A David.

(25) Q He did?

1) A Uh-huh.)

2) Q (Okay.) Was that something where he jumped into
3) the pool naked or --)

4) A I think he got into the pool and then pulled --
5) he took his shirt and everything off, got in the pool
6) (with his boxers on and pulled his boxers off once he was
7) in the pool.)

8) Q (Okay.) So you physically observed him pull his
9) boxers off?)

10) A I didn't physically observe him pull them off.)

11) Q (Okay.) Did you record any videos while you were
12) at Mr. Arambula's home that evening?)

13) A Yes, I did.)

14) Q How many?)

15) A One.)

16) Q (Okay.) And what was that video of?)

17) A Him in the pool.)

18) Q (Okay.) Did you give that video to Christopher
19) Williams?)

20) A I don't remember giving it to Chris. I may
21) have.)

22) Q Okay. Do you know -- can you give me an
23) explanation, if you know, why you would be promised to
24) give Mr. Williams a copy of that video?

25) A I didn't promise him, but it was -- at the time

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C E R T I F I C A T E

I, AMANDA NOEL MARCOS, Certified Shorthand Reporter for
the State of California, do hereby certify:

That the witness in the foregoing deposition was by me
first duly sworn to testify to the truth, the whole
truth and nothing but the truth in the foregoing cause;
that the deposition was taken by me in machine shorthand
and later transcribed into typewriting, under my
direction, and that the foregoing contains a true record
of the testimony of the witness.

Dated: This day of April, 2019,
at San Diego, California.

AMANDA NOEL MARCOS
C.S.R. NO. 13965

Taisha Brown, 3/26/2019

1 I, TAISHA BROWN, declare under penalty of perjury under
2 the laws of the State of California that the foregoing
3 is true and correct; that I have read my deposition and
4 have made the necessary corrections, additions or
5 changes to my answers I deem necessary.

6

7 Executed on this 28th day of May,
8 2019.

9

Taisha Brown
TAISHA BROWN

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EXHIBIT 12

Alma Velasquez 10/22/2019

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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.)	

VIDEOTAPED DEPOSITION OF ALMA VELASQUEZ
San Diego, California
October 22, 2019

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

1 Q What did he say?

2 A Part of the conversation was "I got in a
3 fight. This guy was drunk" and proceeded to tell me
4 what had happened in a nutshell.

5 Q Did Mr. Arambula tell you whether he'd been
6 drinking?

7 A No.

8 Q Do you know whether he ever drinks alcohol?

9 A Socially.

10 Q Have you ever seen him drunk?

11 A No.

12 Q Have you ever seen him hungover?

13 A No.

14 Q Are you aware that he got in the pool naked
15 that night?

16 MS. STRAUB: Lacks foundation. Calls for
17 speculation.

18 BY MR. BRIGGS:

19 Q Have you heard that from anyone?

20 A No.

21 Q Have you ever known Mr. Arambula to go
22 skippy-dipping in the pool at home?

23 A No.

24 Q Okay. That's not something he's done around
25 you; is that correct?

1 A No.

2 Q When's his date of birth?

3 A 10/21/1974.

4 Q Okay. Does it seem odd to you -- if it --

5 if it turns out that Mr. Arambula was skinny-dipping

6 in the pool on July 14, would that strike you as odd?

7 MS. STRAUB: Incomplete hypothetical. Lacks

8 foundation. Not calculated to lead to the discovery

9 of admissible evidence.

10 BY MR. BRIGGS:

11 Q You can --

12 MS. STRAUB: You're harassing the witness.

13 BY MR. BRIGGS:

14 Q You can answer.

15 THE WITNESS: Should I answer?

16 MS. STRAUB: Yeah.

17 THE WITNESS: Yes. It would surprise me.

18 BY MR. BRIGGS:

19 Q Okay. That's certainly not something you

20 would expect him to do sober; is that correct?

21 A I --

22 MS. STRAUB: Same objections.

23 BY MR. BRIGGS:

24 Q Was that something that you would expect

25 Mr. Arambula to do sober?

1 A I wouldn't --

2 MS. STRAUB: Same objections.

3 BY MR. BRIGGS:

4 Q You can answer.

5 THE WITNESS: Should I answer?

6 MS. STRAUB: Yes.

7 THE WITNESS: I wouldn't have expected him
8 to do it ever.

9 BY MR. BRIGGS:

10 Q Okay. Is there anything else about the
11 fight that Mr. Arambula told you that you haven't told
12 me about yet?

13 A No.

14 Q Okay.

15 A I don't recall anything else.

16 Q Okay. When you got to the house --
17 withdrawn.

18 After the wedding, did -- you went to
19 Mr. Arambula's house or a different place?

20 A His house.

21 Q Okay. When you got to his house, did you
22 see any indication that there had been a fight there
23 the night before?

24 MS. STRAUB: Calls for speculation.

25 Go ahead.

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.

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HEIDI J. JOHNSON, RPR, CSR NO. 12525

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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