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Superior Court of California,  
County of San Diego  
**08/03/2022** at 03:49:00 PM  
Clerk of the Superior Court  
By E- Filing, Deputy Clerk

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

10 CHRISTOPHER WILLIAMS,

11 Plaintiff,

12 vs.

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

15 Defendants.

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

**PLAINTIFF CHRISTOPHER  
WILLIAMS'S OPPOSITION TO  
DEFENDANTS' MOTION *IN LIMINE*, 2  
OF 23**

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

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

16  
17 Plaintiff Christopher Williams ("Plaintiff") respectfully submits this brief in opposition to  
18 Defendants David Arambula and City of Lemon Grove (collectively, "Defendants")'s Motion *In Limine*  
19 No. 2 to exclude evidence of alleged damages due to the disapproval of his medical marijuana  
20 dispensaries.

21 Defendants claim that all testimony or evidence with respect to loss of income and/or lost  
22 business opportunity due to medical marijuana dispensaries not being approved must not be allowed  
23 into evidence at trial because the approval and/or disapproval is a discretionary decision for with City  
24 of Lemon Grove ("City") Council Members are immune from liability. The motion should be denied.

25  
26 Plaintiff's injuries were a direct result of his pending marijuana dispensary applications.  
27 Because Plaintiff's lawsuit and injuries are directly related to those applications, Plaintiff should be able  
28 to present evidence and testify as to those damages. Through his lawsuit, Plaintiff pled that he showed

1 up to Defendant David Arambula (“Arambula”)’s to discuss his business with the City- namely, his  
2 applications to the City to open medical marijuana dispensaries. At that meeting, Arambula became  
3 intoxicated, angry, and ended up violently assaulting Plaintiff unprovoked.

4 All relevant evidence is admissible except as otherwise provided by statute. EVID. CODE § 351.  
5 For evidence to be relevant, it must have “any tendency in reason to provide or disprove any disputed  
6 fact that is of consequence to the determination of the action”. EVID. CODE § 210. Because Plaintiff’s  
7 injuries were directly related to and stemmed from his applications for medical marijuana dispensaries,  
8 any subsequent retaliation that he suffered is relevant to his injuries.

9 For these reasons, the motion *in limine* no.2 to exclude the evidence of alleged damages due to  
10 disapproval of medical marijuana dispensaries should be denied.

11  
12 Date: August 3, 2022

Respectfully submitted,

BRIGGS LAW CORPORATION


13  
14 By: Nora Pasin

15 Nora Pasin  
16 Cory J. Briggs  
Attorneys for Plaintiff Christopher Williams

**PROOF OF SERVICE**

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

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

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. I served the documents on the person(s) identified on the attached mailing/service list as follows:  
  
 **by personal service.** I personally delivered the documents to the person(s) at the address(es) indicated on the list.

**by U.S. mail.** I sealed the documents in an envelope or package addressed to the person(s) at the address(es) indicated on the list, with first-class postage fully prepaid, and then I \_\_\_\_\_ deposited the envelope/package with the U.S. Postal Service  
  
\_\_\_\_\_ placed the envelope/package in a box for outgoing mail in accordance with my office's ordinary practices for collecting and processing outgoing mail, with which I am readily familiar. On the same day that mail is placed in the box for outgoing mail, it is deposited in the ordinary course of business with the U.S. Postal Service.

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

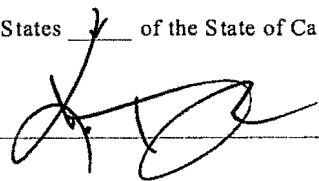
**by overnight delivery.** I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized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

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

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

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

Date: August 3, 2022

Signature: 

**SERVICE LIST**

*Christopher Williams vs. Lemon Grove*

Superior Court of the State of California Case No. 37-2018-00023369-CU-PO-CTL

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