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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

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

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

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

10 CHRISTOPHER WILLIAMS,

11 Plaintiff,

12 vs.

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

15 Defendants.

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

**PLAINTIFF CHRISTOPHER WILLIAMS'S
OPPOSITION TO DEFENDANTS'
MOTION *IN LIMINE*, 15 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 Defendant
18 David Arambula ("Arambula") and City of Lemon Grove ("City") (collectively, "Defendants")'s Motion *In*
19 *Limine* No. 15 to preclude media coverage of trial proceedings.

20 The motion should be denied. Instead of a blanket prohibition against media coverage, allowance for
21 media coverage should be granted on a case-by-case basis in accordance with California Rule of Court 1.150
22 in order to allow for citizens' access to the Court¹.

23 Media coverage may be permitted by written order of the court. *See* Cal. Rul. Ct. 1.150(e). Factors
24 to be considered when determining a request for media coverage include, but are not limited to: the importance
25 of maintaining public trust and confidence in the judicial system; the importance of promoting public access to
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¹The County of San Diego Superior Court also issued a General Order on December 27, 2021 regarding
procedure regulating photography, recording and broadcasting in courthouse (Order No. 010122-02).

1 the judicial system; and the nature of the case². See Cal. Rul. Ct. 1.150(e)(3)(A), Cal. Rul. Ct.
2 1.150(e)(3)(B), Cal. Rul. Ct. 1.150(e)(3)(D).

3 Plaintiff's lawsuit claims that he was attacked by Arambula when Arambula was acting as an elected
4 City Council Member and that the attack occurred while Arambula was conducting official City business.
5 Because the City is a defendant to this case, coverage of the trial may be pertinent to the City's constituents
6 who are interested in and want to remain informed on City related matters and business. If the media were
7 to cover any portions of the trial, in accordance with the California Rules of Court, it would provide for fair
8 access to the Court for all interested parties who may be unavailable to otherwise observe the trial.

9 Based on the foregoing, Defendants' request for a blanket-prohibition against media coverage at trial
10 should be denied.

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12 Date: August 3, 2022

Respectfully submitted,

13 BRIGGS LAW CORPORATION

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15 By: _____

Nora Pasin

16 Nora Pasin
17 Cory J. Briggs
18 Attorneys for Plaintiff Christopher Williams
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²All factors to be considered are listed under California Rule of Court 1.150(e).

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 **B**

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

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

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

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

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

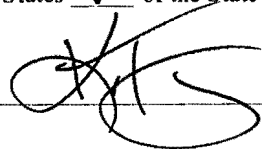
by overnight delivery. I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized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

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

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

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

Date: August 3, 2022

Signature: 

SERVICE LIST

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

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