



1	4	Plaintiff	Candid Chronicle March 15, 2018 news article, "Something Does Not Add Up; Councilman Matt Mendoza Requests an Investigation" by Cara Anderson	2, 3, 5, 6, 7		
2	5	Plaintiff	East County Magazine March 14, 2018 news article, "Lemon Grove Councilman Disputes Assault Claim, Says He Acted in Self Defense" by Miriam Raftery.	2, 3, 5, 6, 7		
3	6	Plaintiff	San Diego Union Tribune March 13, 2018 news article, "Lemon Grove Official Wants Investigation" by Karen Pearlman	2, 3, 5, 6, 7		
4	7	Plaintiff	San Diego Union Tribune March 9, 2018 news article, "Cannabis Businessman Accuses Lemon Grove Councilman of Assault" by Karen Pearlman	2, 3, 5, 6, 7		
5	8	Plaintiff	Candid Chronicle March 9, 2018 news article, "Lemon Grove Councilman Arambula Accused of Assaulting Dispensary Applicant" by Cara Anderson	2, 3, 5, 6, 7		
6	9	Plaintiff	Text messages between Taisha Brown and Chris Williams July 13, 2017 to July 14, 2017			
7	10	Plaintiff	City of Lemon Grove City Council Meeting Agenda, February 20, 2018	2, 3, 6, 7		
8	11	Plaintiff	Lemon Grove City Council Agenda Item Summary March 6, 2018	2, 3, 6, 7		
9	12	Plaintiff	San Diego County Sheriff's Department Public Records Request Victim Copy, July 15, 2017	2, 3, 6, 7		

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

1	32	Plaintiff	Exhibit 1 to Deposition Transcript of Debbie Stiesmeyer (Police Records/Reports)	3, 6		
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3	33	Plaintiff	Exhibit 2 to Deposition Transcript of Debbie Stiesmeyer (Police Photos)			
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5	34	Plaintiff	Deposition Transcript of Racquel Vasquez			
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7	35	Plaintiff	Deposition Transcript of Christopher Williams (Volume 1)			
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9	36	Plaintiff	Deposition Transcript of Christopher Williams (Volume 2)			
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11	37	Plaintiff	Video Deposition of David Arambula			
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13	38		Reserved			
14	39		Reserved			
15	40		Reserved			
16	41		Reserved			
17	42		Reserved			
18	43		Reserved			
19	44		Reserved			
20	45		Reserved			
21	46		Reserved			
22	47		Reserved			
23	48		Reserved			
24	49		Reserved			
25	50					
26	201	Def David Arambula	Lemon Grove Municipal Code, Title 17 – Zoning, Section 17.32.090	2, 6, 7		
27						
28	202	Def David Arambula	Planning Permit Submittal Checklist (Medical Marijuana Dispensary), revised <b>March 2017</b>	2, 6, 7		
	203	Def David Arambula	Marijuana Dispensaries, Cultivation & Delivery Information Bulletin 23, dated <b>March 2017</b>	2, 6, 7		
	204	Def David Arambula	Lemon Grove Medical Marijuana Dispensary Zoning Map, dated March 18, 2017	2, 6, 7		
	205	Def David Arambula	Business License Application for Broadway Patient Care	2, 6, 7		

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

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

		September 19, 2017			
1	231	Def David Arambula	Item no. 8 from City packet re public appeal (6915 North Avenue), dated September 19, 2017	2, 6, 7	
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3	232	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re incomplete application (8280 Broadway), dated October 11, 2017	2, 6, 7	
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5	233	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re incomplete application (6915 North Avenue), dated October 11, 2017	2, 6, 7	
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7	234	Def David Arambula	Conditional Use Permit application (rejected) (6915 North Avenue), dated December 11, 2017	2, 6, 7	
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9	235	Def David Arambula	Email from City to Plaintiff re meeting and re-submittal (6915 North Avenue), dated December 12, 2017	2, 6, 7	
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11	236	Def David Arambula	Conditional Use Permit Application (6915 North Avenue), January 2018	2, 6, 7	
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13	237	Def David Arambula	Email chain between City and Plaintiff re re-submittals and submission process (6915 North Avenue), dated January 11, 2018	2, 6, 7	
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15	238	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re incomplete application (6915 North Avenue), dated March 8, 2018	2, 6, 7	
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17	239	Def David Arambula	Letter from City to Plaintiff and Mattar re conditional approval of Cornerstone Brewery business license (8280 Broadway), dated May 10, 2018	2, 6, 7	
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19	240	Def David Arambula	Letter from City to Kathleen McLean and Mattar re response to status inquiry (8260 Broadway), dated May 10, 2018	2, 6, 7	
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1	241	Def David Arambula	Complaint for Damages, filed by Plaintiff on May 11, 2018	1	3/1/23	
2	242	Def David Arambula	Request for Production of Documents (Set One) propounded by City of Lemon Grove to Plaintiff, dated June 21, 2018	1		
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5	243	Def David Arambula	Special Interrogatories (Set One) propounded by City of Lemon Grove to Plaintiff, dated June 21, 2018	1		
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7	244	Def David Arambula	Form Interrogatories (Set One) propounded by City of Lemon Grove to Plaintiff, dated June 21, 2018	1		
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10	245	Def David Arambula	Defendant City of Lemon Grove's Answer to Complaint, filed June 22, 2018	1		
11	246	Def David Arambula	Form Interrogatories (Set One) propounded to Plaintiff by David Arambula, dated July 11, 2018	1		
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14	247	Def David Arambula	Defendant David Arambula's Special Interrogatories to Plaintiff, Set One, dated July 11, 2018	1		
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16	248	Def David Arambula	Defendant David Arambula's Requests for Production of Documents to Plaintiff, Set One, dated July 11, 2018	1		
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18	249	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Request for Production of Documents (Set One), dated August 14, 2018	1		
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21	250	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Form Interrogatories (Set One), dated August 14, 2018	1		
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23	251	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Special Interrogatories (Set One), dated August 14, 2018	1		
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26	252	Def David Arambula	Plaintiff's Responses to Defendant City of Lemon Grove's Request for Production of Documents (Set One), dated August 14, 2018	1		
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1	253	Def David Arambula	Plaintiff's Responses to Defendant David Arambula's Special Interrogatories (Set One), dated August 14, 2018	1	3/1/23	
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3	254	Def David Arambula	Supplemental Responses of Plaintiff to Defendant David Arambula's Form Interrogatories (Set One), dated September 27, 2018	1		
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6	255	Def David Arambula	Supplemental Responses of Plaintiff to Defendant David Arambula's Special Interrogatories (Set One), dated September 27, 2018	1	3/1/23	
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9	256	Def David Arambula	Supplemental Responses of Plaintiff to Defendant David Arambula's Request for Production of Documents (Set One), dated September 27, 2018	1		
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12	257	Def David Arambula	Minute Order granting (in part) Motion to Strike Portions of Complaint, dated October 5, 2018	1		
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15	258	Def David Arambula	Email from Plaintiff to City re no question of zoning approval (2295 Lemon Grove and 8260 Broadway), dated November 1, 2018	2, 6, 7		
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18	259	Def David Arambula	Defendant David Arambula's Answer to Complaint, filed November 29, 2018	1		
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20	260	Def David Arambula	Planning Permit Application (2295 Lemon Grove Avenue), filed December 20, 2018	2, 6, 7		
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22	261	Def David Arambula	Planning Permit Application (8260 Broadway), filed December 20, 2018	2, 6, 7		
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24	262	Def David Arambula	CornerStone Market Business Plan, dated 2019	2, 6, 7		
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26	263	Def David Arambula	CornerStone Market Financial Projections	2, 6, 7		
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28	264	Def David Arambula	CornerStone Market Dispensary Investment package	2, 6, 7		
	265	Def David Arambula	Pick Axe Holdings business package	2, 6, 7		
	266	Def David Arambula	Follow-Up Report no. 17136885.2, dated January 18,	2, 6, 7	3/1/23	

		2019				
1	267	Def David Arambula	Letter from City to Plaintiff and MAVA Irrevocable Trust re denial of zoning clearance application (2295 Lemon Grove Avenue), dated January 25, 2019	2, 6, 7		
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5	268	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re denial of zoning clearance application (8260 Broadway), dated January 25, 2019	2, 6, 7		
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8	269	Def David Arambula	Planning Permit Application - Appeal (for 8260 Broadway), filed February 4, 2019	2, 6, 7		
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10	270	Def David Arambula	Appeal Application & Request for Public Hearing (8260 Broadway), dated February 4, 2019	2, 6, 7		
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12	271	Def David Arambula	Letter from City to Plaintiff re protected use disclosures (2295 Lemon Grove Avenue), dated February 11, 2019	2, 6, 7		
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14	272	Def David Arambula	Letter from City to Plaintiff re protected use disclosures (8260 Broadway), dated February 11, 2019	2, 6, 7		
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16	273	Def David Arambula	Minute Order re City of Lemon Grove's Motion for Summary Judgment, or in the Alternative, Motion for Summary Adjudication, dated February 11, 2019	2, 6, 7		
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20	274	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re Notice of Incomplete Conditional Use Permit (6915 North Avenue), dated February 14, 2019	2, 6, 7		
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23	275	Def David Arambula	Plans for re-submittal (6915 North Avenue), submitted June 2019	2, 6, 7		
24						
25	276	Def David Arambula	Email from City to Plaintiff re re-submittal of Conditional Use Permit application (6915 North Avenue), dated June 19, 2019	2, 6, 7		
26						
27	277	Def David Arambula	Notice of Deposition of Plaintiff Christopher Williams	1		
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		(Volume II), dated July 1, 2019			
1	278	Def David Arambula	Item no. 2 from City agenda – packet re public appeal (8260 Broadway), dated July 11, 2019	2, 6, 7	
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3	279	Def David Arambula	Item no. 2 from City agenda – packet re public appeal (2295 Lemon Grove Avenue), dated July 11, 2019	2, 6, 7	
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5	280	Def David Arambula	City Council Regular Meeting Agenda dated July 16, 2019	2, 6, 7	
6	281	Def David Arambula	City Council Staff Report – Item no. 2 (2295 Lemon Grove Avenue), dated July 16, 2019	2, 6, 7	
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8	282	Def David Arambula	City Council Staff Report – Item no. 3 (8260 Broadway), dated July 16, 2019	2, 6, 7	
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10	283	Def David Arambula	Email chain between Cara Anderson and City re Resolution no. 01-25 (8260 Broadway), dated July 18, 2019	2, 6, 7	
11					
12	284	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re Notice of Incomplete for Conditional Use Permit (6915 North Avenue), dated August 8, 2019	2, 6, 7	
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14	285	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re Minor Use Permit (8280 Broadway), dated September 19, 2019	2, 6, 7	
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16	286	Def David Arambula	Defendant David Arambula’s Supplemental Request for Production to Plaintiff Christopher Williams, Set One, dated October 1, 2019	1	
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18	287	Def David Arambula	Defendant David Arambula’s Requests for Production to Plaintiff Christopher Williams, Set Two, dated October 1, 2019	1	
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20	288	Def David Arambula	Defendant David Arambula’s Supplemental Interrogatory to Plaintiff Christopher Williams, Set One, dated October 1, 2019 (w/Declaration)	1	
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22	289	Def David	Supplemental Interrogatories	1	
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1		Arambula	propounded by City of Lemon Grove to Plaintiff, dated October 11, 2019			
2	290	Def David Arambula	Supplemental Request for Production of Documents propounded by City of Lemon Grove to Plaintiff, dated October 11, 2019	1		
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5	291	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re Minor Use Permit (8280 Broadway), dated October 16, 2019	2, 6, 7		
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8	292	Def David Arambula	Defendant David Arambula's Initial Exchange of Expert Witness Information; Declaration of Emily M. Straub in Support Thereof, dated October 24, 2019	1		
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12	293	Def David Arambula	First Written Exchange of Required Expert Witness Information of City of Lemon Grove, dated October 24, 2019	1		
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14	294	Def David Arambula	Responses of Plaintiff to Defendant David Arambula's Supplemental Interrogatory, dated November 4, 2019	1		
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16	295	Def David Arambula	Responses of Plaintiff to Defendant David Arambula's Special Interrogatories (Set Two), dated November 4, 2019	1		
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19	296	Def David Arambula	Responses of Plaintiff to Defendant David Arambula's Supplemental Request for Production, dated November 4, 2019	1		
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22	297	Def David Arambula	Responses of Plaintiff to Defendant David Arambula's Request for Production (Set Two), dated November 4, 2019	1		
23						
24	298	Def David Arambula	Letter from City to Plaintiff and Mattar Family Trust re Notice of Decision on Minor Use Permit (8280 Broadway), dated November 5, 2019	2, 6, 7		
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27	299	Def David Arambula	Exhibit 1 to the Deposition of Dr. Haders (Medical records of Alvarado Hospital Medical	1		
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		Center, in response to Subpoena)			
300	Def David Arambula	Exhibit 1A to the Deposition of Dr. Haders (Emergency Department Note, dated July 15, 2017)	1		
301	Def David Arambula	Exhibit 1B to the Deposition of Dr. Haders (Discharge information and instructions, dated July 15, 2017)	1		
302	Def David Arambula	Exhibit 1C to the Deposition of Dr. Haders (Assessment History Report, dated July 15, 2017)	1		
303	Def David Arambula	Exhibit 1 to the Deposition of Dr. O'Shaughnessy (Medical records of Alvarado Hospital Medical Center, in response to Subpoena)	1		
304	Def David Arambula	Exhibit 1A to the Deposition of Dr. O'Shaughnessy (Report of x-ray examination of Plaintiff's right chest and ribs, dated July 15, 2017)	1		
305	Def David Arambula	Exhibit 1B to the Deposition of Dr. O'Shaughnessy (Report of Computed Tomography scan of Plaintiff's head, dated July 15, 2017)	1		
306	Def David Arambula	Exhibit 2 to the Deposition of Dr. O'Shaughnessy (Flash drive containing imaging records from Alvarado Hospital Medical Center, dated July 15, 2017)	1		
307	Def David Arambula	Electronic radiology imaging from Alvarado Hospital Medical Center (produced September 24, 2018)	1		
308	Def David Arambula	Video of Deposition of Alma Velasquez, recorded on October 22, 2019			
309	Def David Arambula	Video excerpt compilation from videotaped deposition of Alma Velasquez, recorded on October 22, 2019			
310		<i>Reserved</i>			

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

	Lemon Grove				
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GROUNDS FOR OBJECTION

1. No objection; admissibility Stipulated
2. Irrelevant (§210)
3. Hearsay (§1200)
4. Best Evidence (§1500)
5. Inadmissible Opinion (§800) Prejudicial, Confusing, or Misleading (§352)
6. Insufficient Foundation (§403) Relevancy, Personal Knowledge, Authenticity (§1400, Identity)
7. Unduly Time Consuming,
8. Subsequent Repair (§1151)
9. Other (Specify)