

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

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

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'S OBJECTIONS TO
 DEFENDANT'S EVIDENCE SUBMITTED
 ON REPLY**

Action Filed: May 11, 2018
 Department: C-68 (Whitney)

Hearing Date: January 4, 2019
 Hearing Time: 10:00 a.m.

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 18 Plaintiff Christopher Williams ("Plaintiff") respectfully objects as follows to the entirety of the
 19 Declaration of Heidi K. Williams: Violation of Plaintiff's due-process right by submitting evidence on
 20 reply, contrary to *San Diego Watercrafts v. Wells Fargo Bank, N.A.*, 102 Cal. App. 4th 308, 316 (2002).

21 In addition, Plaintiff objects as follows to specific portions of the Williams Declaration:

Objectionable Evidence	Basis for Objection	Ruling
Declaration of Heidi K. Williams, ¶¶ 4 & 5.	EVID. CODE §§ 1521 & 1523. The declaration is a substitute for oral testimony to prove the contents of a writing, in violation of the "secondary evidence rule."	___ Sustained ___ Overruled
Declaration of Heidi K. Williams, ¶¶ 4 & 5.	EVID. CODE § 1401(a) & (b). The two writings described in these paragraphs have not been authenticated. The "secondary evidence rule" requires authentication.	___ Sustained ___ Overruled

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Declaration of Heidi K. Williams, ¶¶ 4 & 5.	EVID. CODE § 1200(a) & (b). The contents of the two writings – neither of which was created by <i>any</i> party to this lawsuit – constitutes an out-of-court statement offered for the truth of the matter asserted.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
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Date: December 28, 2018.

Respectfully submitted,

BRIGGS LAW CORPORATION

By: Cory J. Briggs
Cory J. Briggs

Attorneys for Plaintiff Christopher Williams

PROOF OF SERVICE

1. My name is Janna Ferraro. 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 December 28, 2018, I served _____ an original copy a true and correct copy of the following documents: Plaintiff's Objections to Defendant's Evidence Submitted on Reply

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.

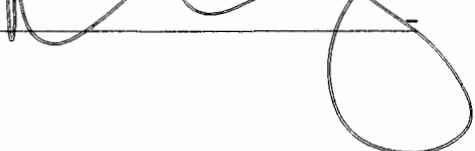
____ *by overnight delivery*. I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized 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: December 28, 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
225 Broadway, Suite 2200
San Diego, California 92101
Telephone: (619) 232-1183
koberrecht@hortonfirm.com

*Attorneys for Defendant CITY OF LEMON
GROVE*

Susan L. Oliver, Esq.
Emily M. Straub, Esq.
TYSON & MENDES
5661 La Jolla Boulevard
La Jolla, CA 92037
Telephone: (858) 459-4400
Soliver@tysonmendes.com
estraub@tysonmendes.com

Attorneys for Defendant DAVID ARAMBULA