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Superior Court of California,
County of San Diego
03/08/2019 at 04:54:00 PM
Clerk of the Superior Court
By Vanessa Bahena, Deputy Clerk

4 Attorneys for Defendant DAVID ARAMBULA

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

10 CHRISTOPHER WILLIAMS,

11 Plaintiff,

12 v.

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

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16 Defendants.
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Case No. 37-2018-00023369-CU-PO-CTL
[Complaint Filed: May 11, 2018]

Judge: Hon. Richard S. Whitney
Dept: C-68

**NOTICE OF LODGMENT IN
SUPPORT OF DEFENDANT DAVID
ARAMBULA'S MOTION TO
COMPEL PLAINTIFF
CHRISTOPHER WILLIAMS TO
ANSWER DEPOSITION QUESTIONS
AND PRODUCE DOCUMENTS, AND
TO REQUEST RELIEF FROM THE
SEVEN-HOUR DEPOSITION RULE**

*(Notice of Motion and Motion,
Memorandum of Points and Authorities,
Separate Statement, Declaration of Emily
M. Straub, and [Proposed] Order filed
concurrently herewith)*

Hearing

Date: June 14, 2019
Time: 10:30 a.m.
Dept: C-68

Trial Date: December 13, 2019

1 Defendant David Arambula hereby lodges the following documents in support of his Motion
2 to Compel Plaintiff to Answer Deposition Questions and Produce Documents, and to Request Relief
3 from Seven-Hour Deposition Rule:

4 **Exhibit 1:** Plaintiff Christopher Williams' Complaint for Damages, file-stamped May
5 11, 2018

6 **Exhibit 2:** Defendant David Arambula's Form Interrogatories (Set One), with proof of
7 service dated July 11, 2018

8 **Exhibit 3:** Defendant David Arambula's Special Interrogatories (Set One), with proof of
9 service dated July 11, 2018

10 **Exhibit 4:** Plaintiff Christopher Williams' Responses to Defendant David Arambula's
11 Form Interrogatories (Set One), with proof of services dated August 14, 2018

12 **Exhibit 5:** Plaintiff Christopher Williams' Responses to Defendant David Arambula's
13 Special Interrogatories (Set One), with proof of services dated August 14,
14 2018

15 **Exhibit 6:** Plaintiff Christopher Williams' Supplemental Responses to Defendant David
16 Arambula's Form Interrogatories (Set One), with proof of services dated
17 September 27, 2018

18 **Exhibit 7:** Defendant David Arambula's Fourth Amended Notice of Deposition of
19 Plaintiff Christopher Williams and Request for Production of Documents,
20 with proof of service dated December 3, 2018

21 **Exhibit 8:** Plaintiff's Notice of Objections to Deposition Notice, with proof of service by
22 regular mail dated January 3, 2019, and correspondence e-mail exchange
23 between all counsel

24 **Exhibit 9:** February 6, 2019 meet and confer letter from counsel for Mr. Arambula to
25 counsel for Plaintiff

26 **Exhibit 10:** February 28, 2018 e-mail from counsel for Mr. Arambula to counsel for
27 Plaintiff, copied to others, with the following attachments:

28 (a) February 11, 2019 Court Minute Order

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(b) February 28, 2019 letter from Heidi Williams to Cory Briggs

Exhibit 11: March 1, 2019 chain of e-mail exchanges between counsel for all parties

Exhibit 12: March 4, 2019 e-mail from counsel for Mr. Arambula to counsel for Plaintiff

Exhibit 13: March 7, 2019 e-mail exchange between all counsel and attached draft stipulation proposed by counsel for the City of Lemon Grove

Exhibit 14: Select excerpts from the transcript of the January 8, 2019 deposition of Plaintiff Christopher Williams

Dated: March 8, 2019

TYSON & MENDES LLP

By: 

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