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8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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11 WILLIAM EDWARDS,)
12 Plaintiff,) CASE NO.: CV 07-04821 RGK (RZx)
13 vs.)
14 COUNTY OF VENTURA, DEPUTY) SPECIAL INTERROGATORIES
NORA SOLER, DEPUTY VALENCIA,) PROPOUNDED BY PLAINTIFF TO
15 SGT. JOSPEH DEVORICK, DEPUTY) DEFENDANT GUILLERMO
MATTHEW DELAHUERTA, DEPUTY) VALENCIA
16 PEREA, DEPUTY DOMINGUEZ AND)
DOES 1 through 10, inclusive,)
17)
18 Defendants.)
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20 PROPOUNDING PARTY: Plaintiff, WILLIAM EDWARDS

21 RESPONDING PARTY: Defendant, GUILLERMO VALENCIA

22 SET NUMBER: ONE

23 TO: DEFENDANT GUILLERMO VALENCIA AND TO HIS ATTORNEYS OF
24 RECORD:

25 Plaintiff, WILLIAM EDWARDS, hereby requests that Defendant, GUILLERMO
26 VALENCIA, and his attorneys of record, answer the following Special Interrogatories, Set
27 One, under oath, within thirty (30) days from the date of service, pursuant to Federal Rules
28 of Civil Procedure, Rule 33.

1 DEFINITIONS

2 Unless the context clearly indicates otherwise, the following words and phrases are
3 defined and used herein as follows:

4 A. "YOU" and "YOURS" refers to Defendant, GUILLERMO VALENCIA.

5 B. "PLAINTIFF" refers to WILLIAM EDWARDS.

6 C. "INCIDENT" includes the circumstances and events surrounding the
7 detention of William Edwards that occurred on or about February 16, 2007, at or
8 approximately 12:00 a.m. in the City of Camarillo, California giving rise to this action.

9 D. "COMMUNICATION" means, unless otherwise specified, any of the
10 following:

11 (1) any letter, memorandum or other document exchanged, received, or
12 transmitted;

13 (2) any oral conversation between two or more persons, whether such
14 conversation was by chance or pre-arranged, formal or informal, by telephone or in person;

15 (3) any meeting between two or more persons, whether such contact was by
16 chance or pre-arranged, formal or informal, or

17 (4) any documentation summarizing or describing such document,
18 exchange, oral communication or meeting.

19 E. "DOCUMENT" means all written, typewritten, printed, recorded or graphic
20 matters, however produced or reproduced, whether draft or final, whether signed or
21 unsigned. This definition includes any and all of the following: papers; records; notes;
22 summaries; schedules; press releases; reports; memoranda of telephone or in-person
23 conversation by or which any person; letters; telegrams; telexes; tapes; transcripts; recordings;
24 photographs; pictures; films; computer programs; data printouts; discs; any kind of
25 electronically or mechanically recorded materials; or any other graphic; symbolic; recorded
26 or written materials of any nature whatsoever. Any copy of a document which contains any
27 comments, notations, addition, insertion, or marketing of any kind is to be considered a
28 separate document.

1 F. "EVIDENCE" means and refers to testimony, material objects, or other things
2 presented to the senses that may be offered to prove the existence or nonexistence of a fact,
3 and all writings, and other things included in the original and any copy of any written,
4 recorded, filmed or graphic matter, whether produced or reproduced on papers, cards, tapes,
5 film, electronic facsimile, computer storage devices or any other media, including, but not
6 limited to writings (as defined by Federal Rules of Evidence § 1001), memoranda, notes,
7 minutes, records, photographs, movies, video-tapes, audio recordings, correspondence,
8 telegrams, telexes, diaries, bookkeeping entries, financial statements, tax returns, checks,
9 check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, plans,
10 architectural drawings, applications, proposals, agreements, books, pamphlets, articles,
11 leaflets, appointment calendars, work papers, and notes, records and recordings of oral
12 conversations.

13 G. "PERSON" means and refers to any natural person, individual, corporation,
14 partnership, proprietorship, joint venture, governmental entity, and any other public or
15 private entity.

16 SPECIAL INTERROGATORIES

17 1. Have you ever been named as a defendant in any suit which charged you,
18 individually or in your official capacity as a police officer with the use of excessive force?

19 2. If you have been named as a defendant in a lawsuit charging you individually
20 or in your official capacity as a police officer with the use of excessive force, please state the
21 name and address of each plaintiff and the court in which the lawsuit was filed.

22 3. Please state the name, address and telephone number of each individual who
23 was riding in your patrol car at the time you first came in contact with the plaintiff on
24 February 16, 2007 and/or February 17, 2007.

25 4. Please state the name of each police officer who was present during this
26 INCIDENT.

27 5. For each officer identified in response to Special Interrogatory No. 4, please
28 state the badge or identification number of each such officer.

1 6. Please state the name of each police officer who had any verbal communications
2 with the plaintiff during this INCIDENT.

3 7. For each officer identified in response to Special Interrogatory No. 6, please
4 state the badge or identification number of each such officer.

5 8. Please state the name of each police officer who was involved in the physical
6 detention of the plaintiff during this INCIDENT.

7 9. For each officer identified in response to Special Interrogatory No. 8, please
8 state the badge or identification number of each such person.

9 10. Please describe in detail the nature and extent of the involvement of each person
10 who participated, in any way, in the detention of the plaintiff at the time of this
11 INCIDENT.

12 11. Please state the name, address, telephone number and badge number, if
13 applicable, of all persons known to you or your agents or attorneys, who have knowledge of
14 any facts concerning this INCIDENT.

15 12. In chronological order, as accurately as you can remember, state specifically and
16 in detail the exact sequence of events that occurred on February 16, 2007 and/or February
17 17, 2007, leading up to and culminating in the detention of the plaintiff. Please include
18 your time of arrival at all locations involved and the name of any person who accompanied
19 you to each location.

20 13. Please state each and every fact upon which you relied in reaching your decision
21 to take the plaintiff to a Ventura County Mental Health facility and place the plaintiff on a
22 **Welfare and Institutions Code § 5150 hold.**

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1 14. Please state each and every fact upon which you relied in reaching your decision
2 to take the plaintiff to the emergency room of Ventura County Medical Center.

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DATED: February 21, 2008

WILLIAMSON & KRAUSS



By _____
PETER M. WILLIAMSON
Attorneys for Plaintiff
WILLIAM EDWARDS