

EXHIBIT M

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOHN BAUER, an)
individual and as)
Successor in Interest of)
Jacob Bauer, deceased;)
ROSE BAUER, an)Case No.
individual and as)3:19-cv-04593-LB
Successor in Interest of)
Jacob Bauer, deceased,)
)
Plaintiffs,)
)
vs.)
)
CITY OF PLEASANTON,)
BRADLEE MIDDLETON;)
JONATHAN CHIN; RICHARD)
TROVAO; STEVEN BENNETT;)
ALEX KOUMISS; JASON)
KNIGHT; MARTY BILLDT;)
DAVID SPILLER; and DOES)
1 to 50, inclusive;)
)
Defendants.)

REMOTE VIDEOTAPED DEPOSITION
OF

RODOLFO CESAR GRANADOS, JR.
Monday, January 25, 2021
Pleasanton, California

Reported by: B. Suzanne Hull, CSR No. 13495

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APPEARANCES

For Plaintiffs: Gwilliam Ivary, et al.
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The Videographer: Jeff Nichols
Also Present: Brittany Smith

I N D E X

EXAMINATION BY	PAGE
MR. GWILLIAM	5

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 36 -	Interview with Officer Rudy Granados, twenty-five pages	11
Exhibit 37 -	Pleasanton Police Department Use of force policy, twenty-five pages [Previously marked as Exhibit 12 in the deposition of Bradlee Middleton, September 2, 2020]	56

Pleasanton, California

Monday, January 25, 2021; 1:02 p.m.

4833 Bernal Avenue

THE VIDEOGRAPHER: Good afternoon. 13:02:15

We are going on the record at 1:02 p.m. on 13:02:15
January 25th, 2021. 13:02:19

This is media unit one of the video-recorded 13:02:21
deposition of Rodolfo Granados, Jr., taken by counsel 13:02:25
for plaintiffs in the matter of John Bauer, et al., 13:02:30
versus City of Pleasanton, et al., filed in the 13:02:36
United States District Court, Northern District of 13:02:37
California, San Francisco Division. The case number 13:02:41
is 3:19-cv-04593-LB. 13:02:42

This deposition is being held virtually via 13:02:43
Zoom. 13:02:52

My name is Jeff Nichols, from the firm 13:02:53
Veritext Legal Solutions, and I'm the videographer. 13:02:56
The court reporter is Suzanne Hull, from the firm 13:02:58
Veritext Legal Solutions. 13:03:01

Counsel will now please state their 13:03:01
appearances and affiliations for the record. 13:03:04

MR. GWILLIAM: I'm Gary Gwilliam, 13:03:08
representing the plaintiffs in this matter. 13:03:09

MR. BLECHMAN: Noah Blechman, on behalf of 13:03:11

Page 4

1 the defendants. 13:03:14

2 THE VIDEOGRAPHER: Will the court reporter 13:03:15

3 please swear in the witness. 13:03:16

4 THE REPORTER: Raise your right hand, 13:03:18

5 please. 13:03:20

6 Thank you. 13:03:21

7 13:03:21

8 RODOLFO CESAR GRANADOS, JR., 13:03:21

9 called as a witness by counsel for Plaintiffs, being 13:03:21

10 first duly sworn, testified as follows: 13:03:21

11 13:03:26

12 THE WITNESS: I do. 13:03:28

13 THE REPORTER: Thank you. 13:03:29

14 THE VIDEOGRAPHER: Thank you. 13:03:30

15 You may proceed. 13:03:31

16 13:03:31

17 EXAMINATION 13:03:33

18 BY MR. GWILLIAM: 13:03:33

19 Q. Mr. Gwilliam, will you state your full name 13:03:34

20 and address for the record, please. Business address 13:03:36

21 is fine. 13:03:40

22 A. Yes, sir. It is Rodolfo Cesar Granados, 13:03:40

23 Jr., and the address is 4833 Bernal Avenue, 13:03:46

24 Pleasanton, California 94566. 13:03:47

25 Q. Mr. Granados, have you ever had your 13:03:51

1 BY MR. GWILLIAM: 13:36:57

2 Q. When you say there were multiple 13:36:58

3 supervisors, what is your understanding of the role 13:37:00

4 of a supervisor in the same sense as the one that was 13:37:03

5 involved with Jacob Bauer? 13:37:10

6 A. My understanding, a supervisor has several 13:37:11

7 responsibilities. One, observation of the scene as 13:37:14

8 it unfolds. It is a dynamic event. Making sure that 13:37:18

9 everyone involved, including parties around us, the 13:37:22

10 officers and the subject we're contacting or subjects 13:37:25

11 we are contacting are safe; that the manner in which 13:37:28

12 the techniques that are being applied to restrain or 13:37:31

13 detain someone are appropriate; evaluate any other 13:37:35

14 additional needs, such as if someone did sustain an 13:37:41

15 injury, getting someone on scene to take care of 13:37:44

16 that, meaning medical staff; and then conducting 13:37:47

17 a continual evaluation of the event and make sure 13:37:51

18 that everything that is being done is appropriate. 13:37:54

19 Q. Thank you. 13:37:56

20 And -- and you indicate that you thought 13:37:57

21 there were multiple supervisors who would each have 13:37:58

22 that -- the roles that you have nicely articulated 13:38:01

23 there; right? 13:38:06

24 A. Yes. 13:38:07

25 Q. Do you know who they were? 13:38:07

1 STATE OF CALIFORNIA)
) ss.
2 COUNTY OF KERN)
3
4

5 I, B. Suzanne Hull, a Certified Shorthand
6 Reporter in the State of California, holding
7 Certificate Number 13495, do hereby certify that
8 RODOLFO CESAR GRANADOS, JR., the witness named in the
9 foregoing deposition, was by me duly sworn; that said
10 deposition, was taken Monday, January 25, 2021,
11 at the time and place set forth on the first page
12 hereof.

13 That upon the taking of the deposition, the
14 words of the witness were written down by me in
15 stenotypy and thereafter transcribed by computer
16 under my supervision; that the foregoing is a true
17 and correct transcript of the testimony given by the
18 witness.

19 Pursuant to Federal Rule 30(e), transcript
20 review was requested.

21 I further certify that I am neither counsel
22 for nor in any way related to any party to said
23 action, nor in any way interested in the result or
24 outcome thereof.

25 ///

1 Dated this 28th day of January, 2021, at
2 Bakersfield, California.

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4 B. Suzanne Hull, CSR No. 13495
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