

EXHIBIT P

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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JOHN BAUER, an
individual and as
Successor in Interest of
Jacob Bauer, deceased;
ROSE BAUER, an
individual and as
Successor in Interest of
Jacob Bauer, deceased,

No. 3:19-cv-04593-LB

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 SERGEANT ERIC GORA
CONFIDENTIAL TRANSCRIPT

Taken before ERIN F. ROBINSON, RPR, CRR
CSR NO. 12199
January 26, 2021

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REMOTE DEPOSITION OF SERGEANT ERIC GORA

BE IT REMEMBERED, that pursuant to Notice, and on the 26th day of January, 2021, commencing at the hour of 10:19 a.m., before me, ERIN F. ROBINSON, a California Certified Shorthand Reporter, SERGEANT ERIC GORA was present remotely in Sacramento, California, produced as a witness in said action, and being by me first duly sworn, was thereupon examined as a witness in said cause.

---o0o---

APPEARANCES (All counsel appeared remotely):

For the Plaintiffs:

JAYME WALKER

GARY GWILLIAM

BRITTANY SMITH

Gwilliam, Ivary, Chiosso, Cavalli & Brewer

1999 Harrison Street, Suite 1600

Oakland, California 94612

(510) 832-5411

jwalker@giccb.com

For the Defendants:

NOAH BLECHMAN

McNamara, Ney, Beatty, Slattey, Borges & Ambacher

3480 Buskirk Avenue, Suite 250

Pleasant Hill, California 94523

(925) 939-5330

noah.blechman@mcnamaralaw.com

Also Present:

TED HOPPE, Videographer

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1 P R O C E E D I N G S

2 Tuesday, January 26, 2021 - 10:19 a.m.

3 ---oOo---

4 THE VIDEOGRAPHER: Good morning. We're
5 going on the record. The time now is 10:19, on 10:19
6 January 26th, 2021.

7 This is media unit 1 in the video-recorded
8 deposition of Sergeant Eric Gora in the matter of
9 John Bauer, et al., versus City of Pleasanton, et
10 al, filed in the United States District Court, 10:20
11 San Francisco Division, 3:19-CV-04593.

12 This video deposition is being held
13 remotely, services provided by Veritext Legal
14 Solutions. My name is Ted Hoppe from the firm
15 Veritext. I'm the videographer. The court 10:20
16 reporter today is Erin Robinson.

17 Counsel, could you please voice identify
18 yourselves for the record.

19 MS. WALKER: Jayme Walker for the
20 plaintiffs. 10:20

21 MR. BLECHMAN: Noah Blechman on behalf of
22 the defendants.

23 THE VIDEOGRAPHER: Will all others please
24 identify themselves.

25 MS. WALKER: I'm also here with Gary 10:20

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1 Gwilliam, my partner, and Brittany Smith, my
2 associate.

3 THE VIDEOGRAPHER: Thank you. Erin, could
4 you please swear the witness in.

5 SERGEANT ERIC GORA, 10:21
6 sworn as a witness,
7 testified as follows:

8 EXAMINATION

9 BY MS. WALKER:

10 Q. Good morning, Sergeant Gora. 10:21

11 A. Good morning.

12 Q. Could you state your full name for the
13 record, please?

14 A. My first name is Eric, last name is Gora,
15 G-o-r-a. 10:21

16 Q. Have you ever had your deposition taken
17 before?

18 A. Yes, ma'am.

19 Q. How many times?

20 A. One time. 10:21

21 Q. In what context? Was that in your context
22 as an officer for the Pleasanton Police
23 Department?

24 A. Yes, ma'am.

25 Q. And what was the case that your deposition 10:21

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REPORTER'S CERTIFICATE

I, ERIN F. ROBINSON, a Shorthand Reporter, State of California, do hereby certify:

That SERGEANT ERIC GORA, in the foregoing deposition named, was present and by me sworn as a witness in the above-entitled action at the time and place therein specified;

That said deposition was taken before me at said time and place, and was taken down in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings that took place;

IN WITNESS WHEREOF, I have hereunder subscribed my hand this 29th day of January 2021.

Erin F. Robinson

ERIN F. ROBINSON, CSR NO. 12199

State of California

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