EXHIBIT P

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1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	000
4	JOHN BAUER, an
	individual and as
5	Successor in Interest of
	Jacob Bauer, deceased; No. 3:19-cv-04593-LB
6	ROSE BAUER, an
	individual and as
7	Successor in Interest of
	Jacob Bauer, deceased,
8	
	Plaintiffs,
9	vs.
10	CITY OF PLEASANTON;
	BRADLEE MIDDLETON;
11	JONATHAN CHIN; RICHARD
	TROVAO; STEVEN BENNETT;
12	ALEX KOUMISS; JASON
	KNIGHT; MARTY BILLDT;
13	DAVID SPILLER, and DOES
	1 to 50, inclusive,
14	
	Defendants.
15	/
16	
17	REMOTE VIDEOTAPED DEPOSITION OF SERGEANT ERIC GORA
18	CONFIDENTIAL TRANSCRIPT
19	
20	Taken before ERIN F. ROBINSON, RPR, CRR
21	CSR NO. 12199
22	January 26, 2021
23	
24	
25	
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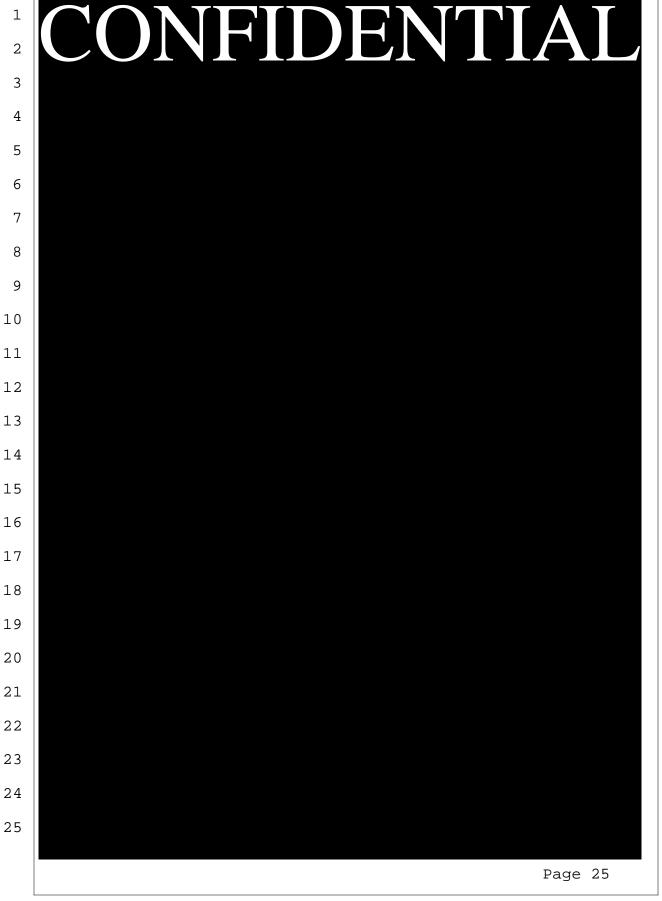
1	REMOTE DEPOSITION OF SERGEANT ERIC GORA
2	
3	BE IT REMEMBERED, that pursuant to Notice, and on
4	the 26th day of January, 2021, commencing at the hour
5	of 10:19 a.m., before me, ERIN F. ROBINSON, a
6	California Certified Shorthand Reporter, SERGEANT ERIC
7	GORA was present remotely in Sacramento, California,
8	produced as a witness in said action, and being by me
9	first duly sworn, was thereupon examined as a witness
10	in said cause.
11	
12	00
13	APPEARANCES (All counsel appeared remotely):
14	For the Plaintiffs:
15	JAYME WALKER
	GARY GWILLIAM
16	BRITTANY SMITH
	Gwilliam, Ivary, Chiosso, Cavalli & Brewer
17	1999 Harrison Street, Suite 1600
	Oakland, California 94612
18	(510) 832-5411
	jwalker@giccb.com
19	
	For the Defendants:
20	
	NOAH BLECHMAN
21	McNamara, Ney, Beatty, Slattery, Borges & Ambacher
	3480 Buskirk Avenue, Suite 250
22	Pleasant Hill, California 94523
	(925) 939-5330
23	noah.blechman@mcnamaralaw.com
24	Also Present:
25	TED HOPPE, Videographer
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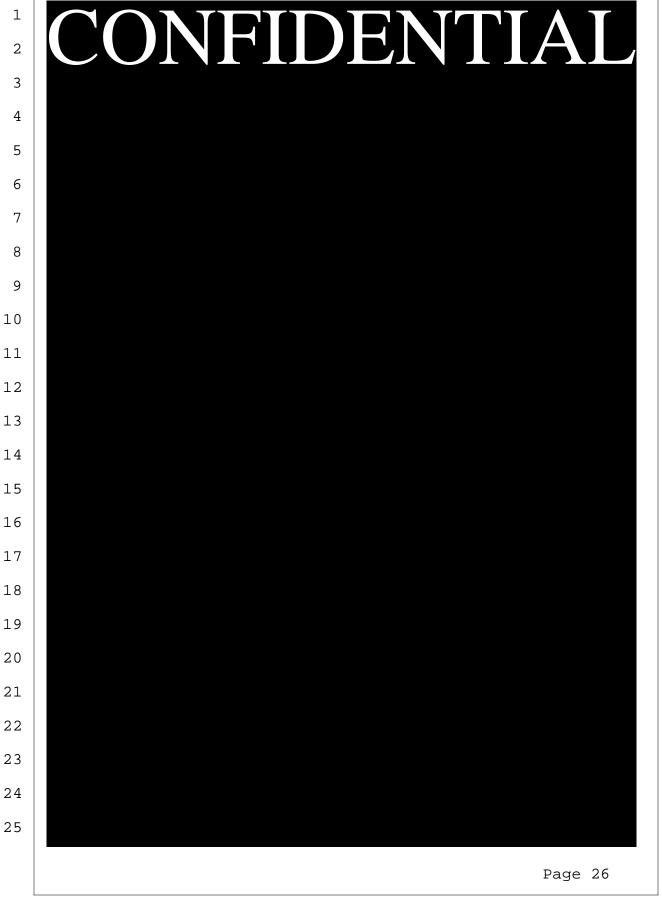
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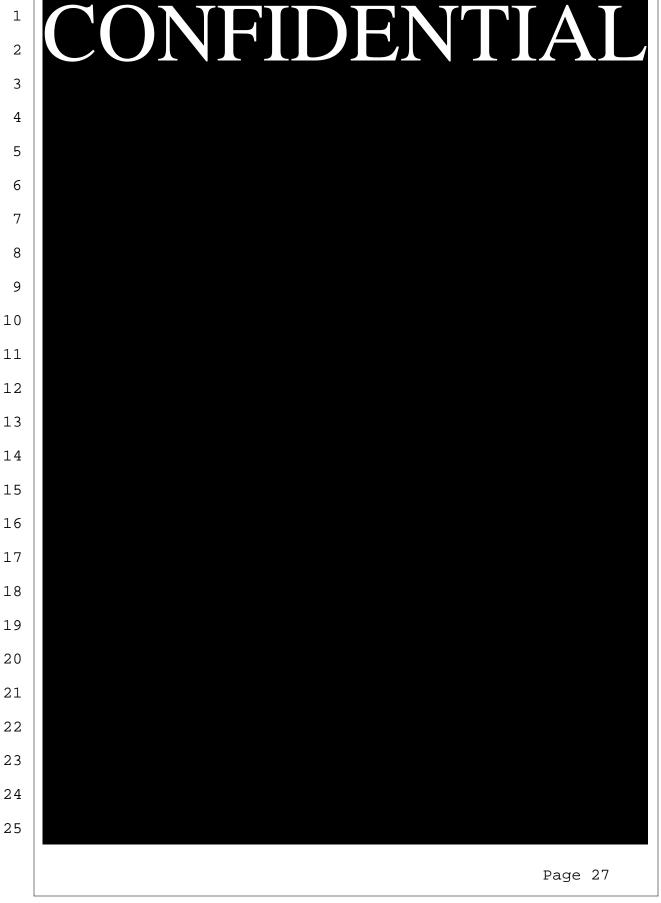
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1	PROCEEDINGS	
2	Tuesday, January 26, 2021 - 10:19 a.m.	
3	00	
4	THE VIDEOGRAPHER: Good morning. We're	
5	going on the record. The time now is 10:19, on 10:19	
6	January 26th, 2021.	
7	This is media unit 1 in the video-recorded	
8	deposition of Sergeant 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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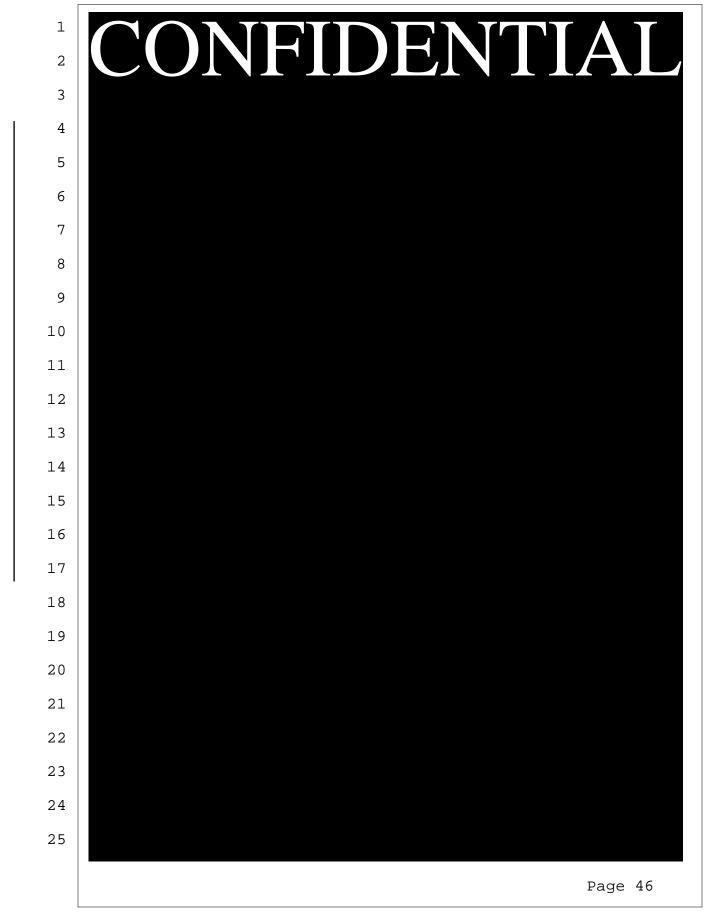
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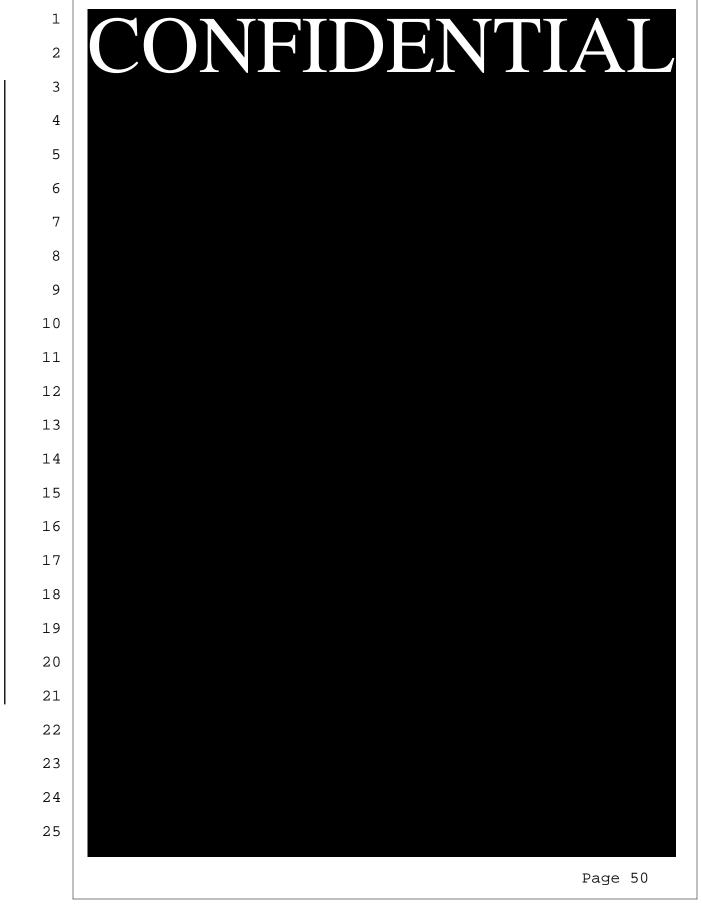
1	Gwilliam, my partner, and Brittany Smith, my
2	associate.
3	THE VIDEOGRAPHER: Thank you. Erin, could
4	you please swear the witness in.
5	SERGEANT ERIC GORA, 10:21
6	sworn as a witness,
7	testified as follows:
8	EXAMINATION
9	BY MS. WALKER:
10	Q. Good morning, Sergeant Gora. 10:21
11	A. Good morning.
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.
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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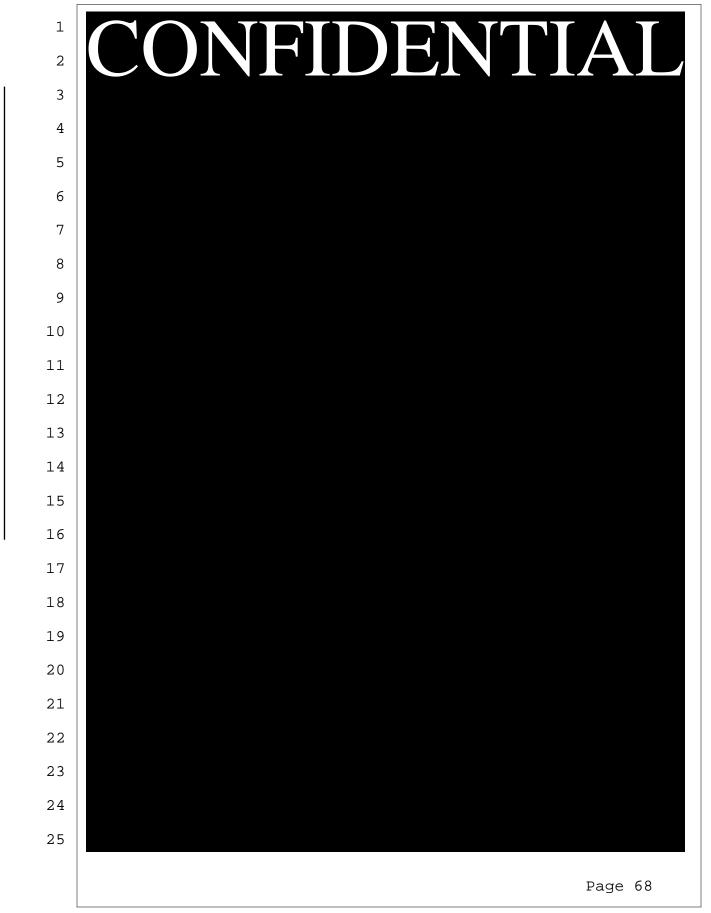


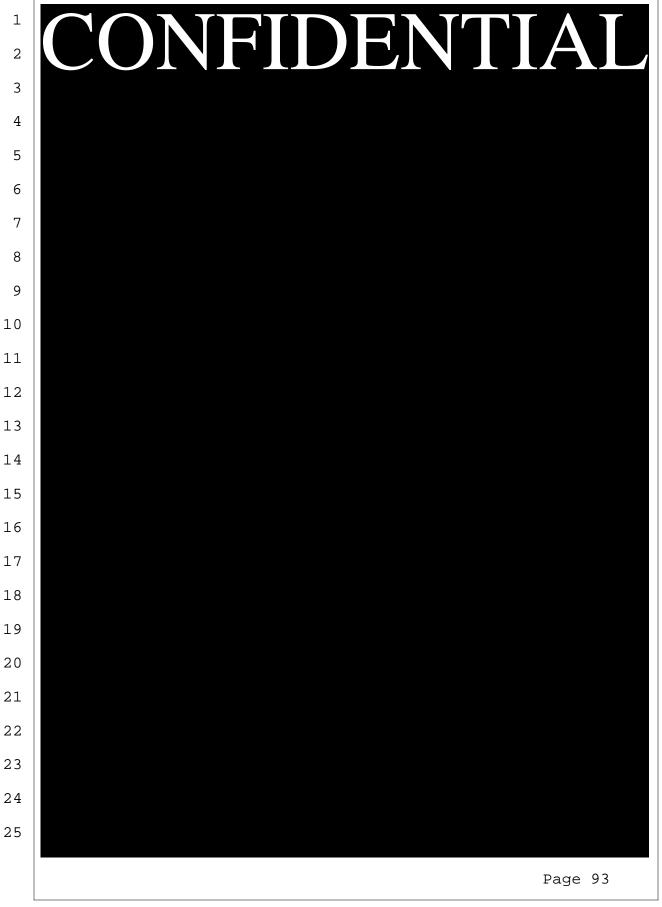


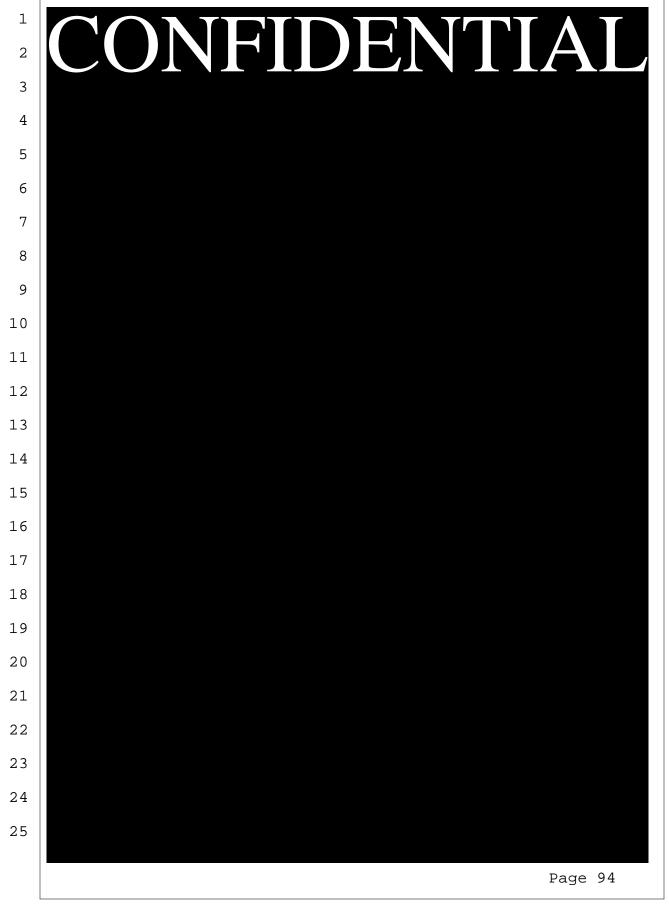


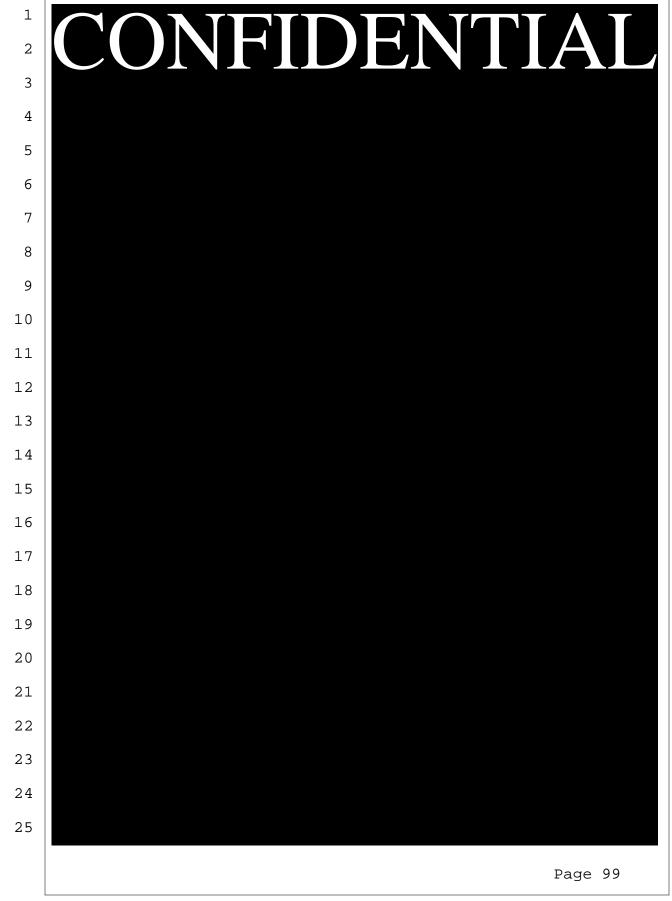


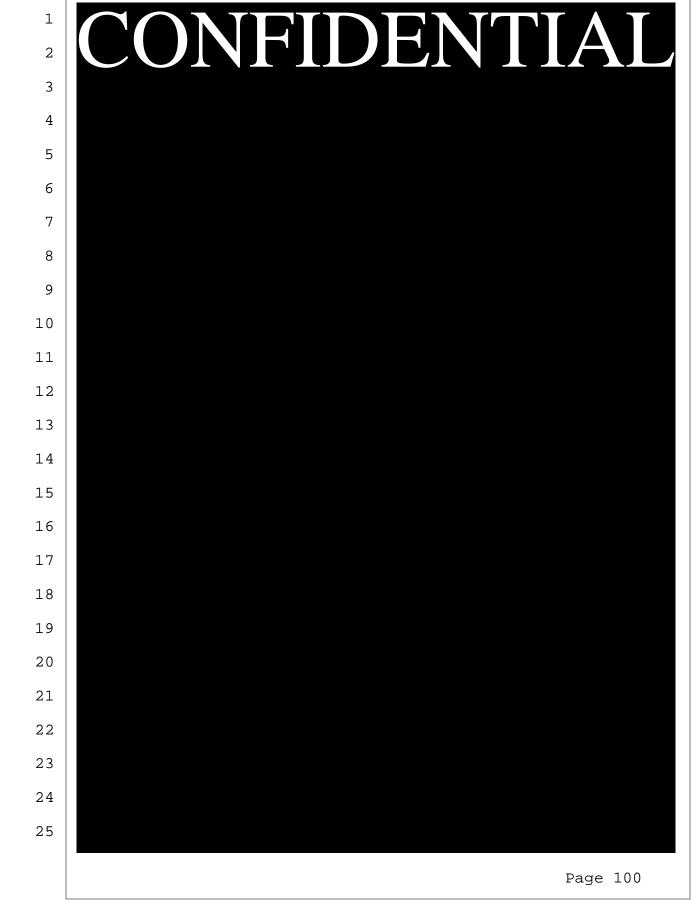


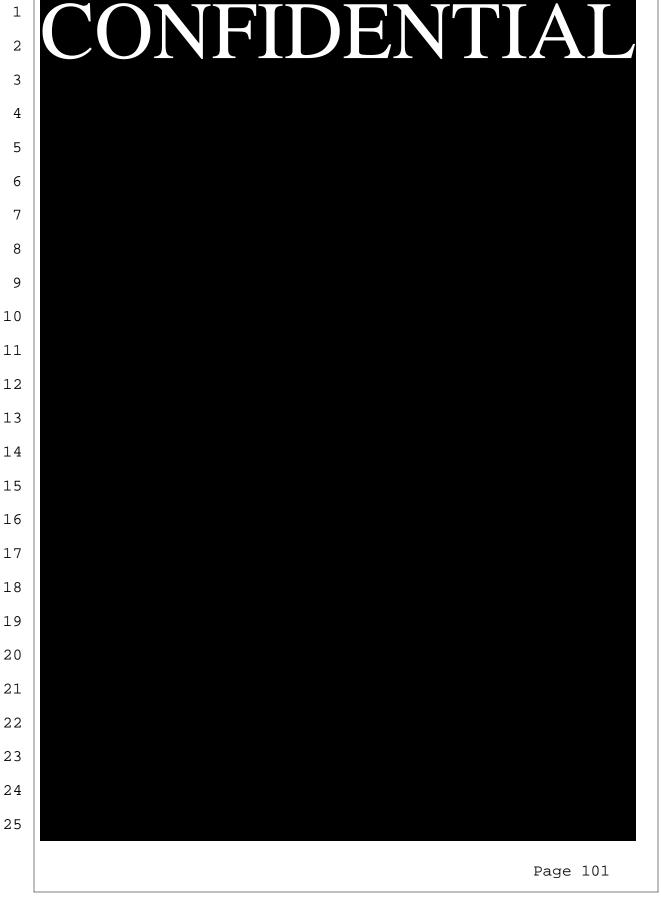


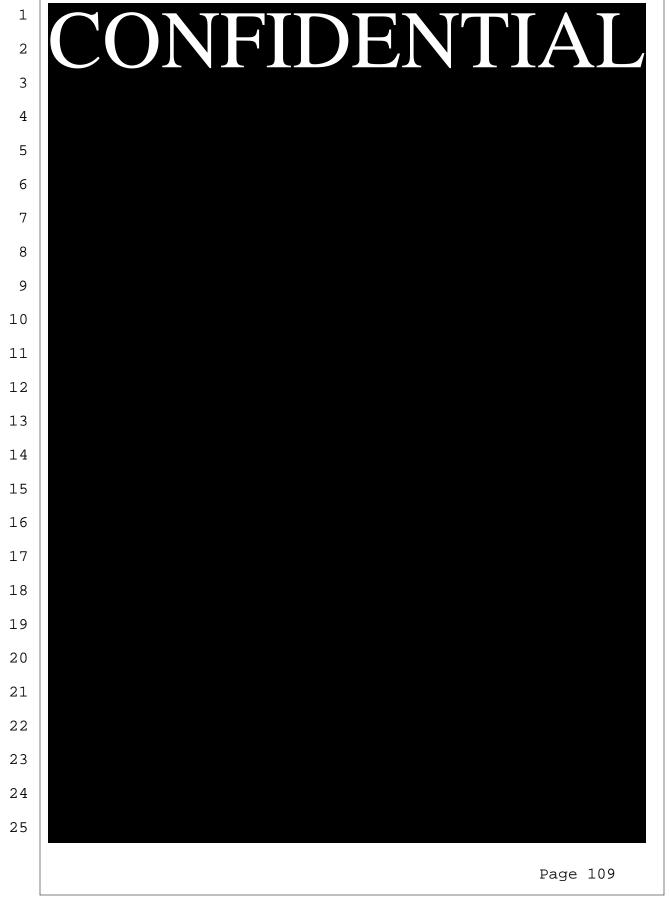


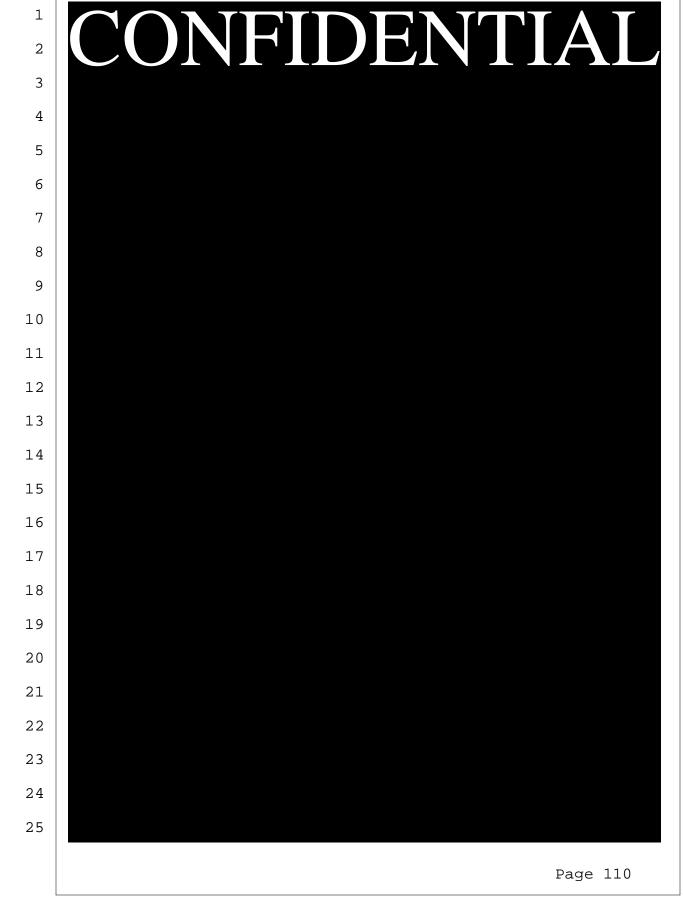


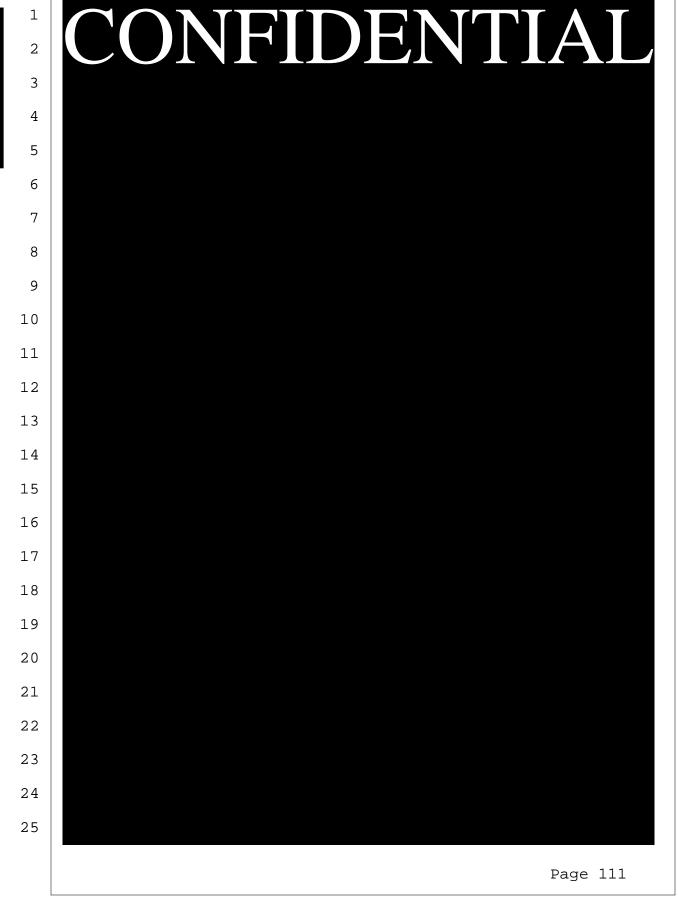


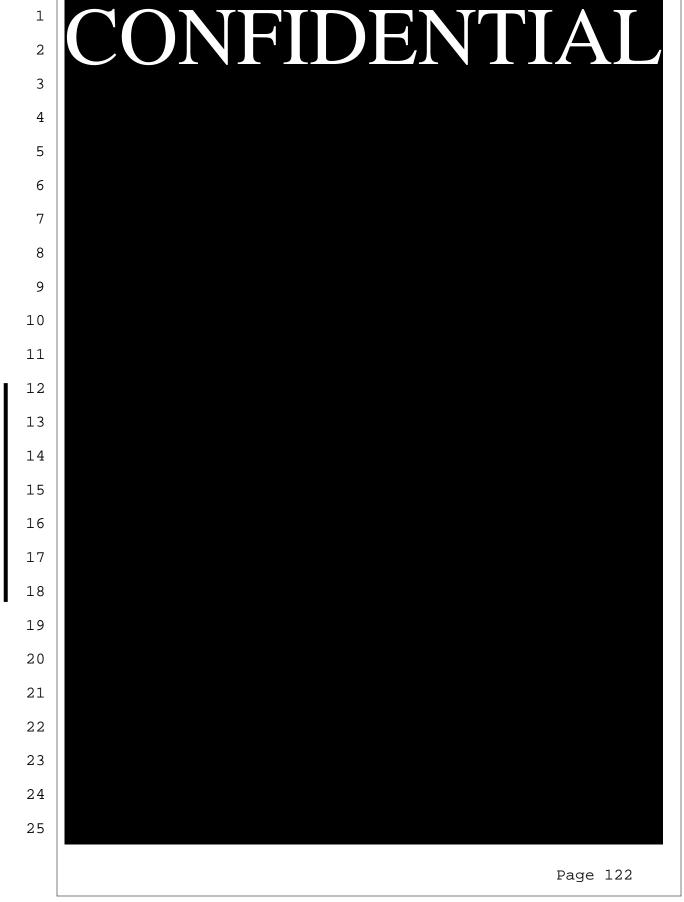


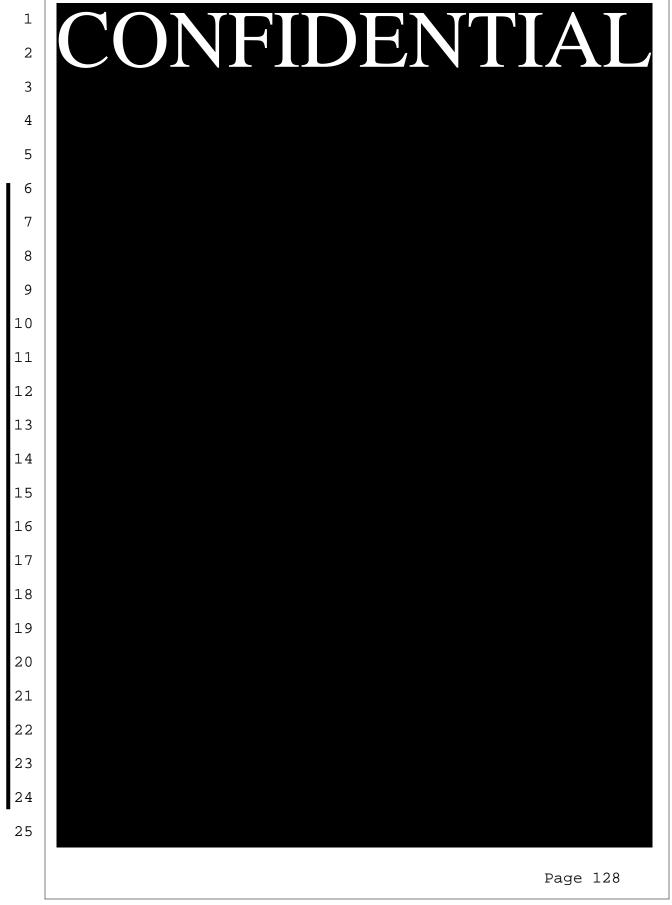












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1	REPORTER'S CERTIFICATE
2	
3	I, ERIN F. ROBINSON, a Shorthand Reporter, State
4	of California, do hereby certify:
5	That SERGEANT ERIC GORA, in the foregoing
6	deposition named, was present and by me sworn as a
7	witness in the above-entitled action at the time and
8	place therein specified;
9	That said deposition was taken before me at said
10	time and place, and was taken down in shorthand by me,
11	a Certified Shorthand Reporter of the State of
12	California, and was thereafter transcribed into
13	typewriting, and that the foregoing transcript
14	constitutes a full, true and correct report of said
15	deposition and of the proceedings that took place;
16	IN WITNESS WHEREOF, I have hereunder subscribed my
17	hand this 29th day of January 2021.
18	
19	
20	
21	Erin J. Robinson
22	Chin J. Kolomoon
	ERIN F. ROBINSON, CSR NO. 12199
23	State of California
24	
25	
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