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Attorneys for Defendant  
GEOFF DEAN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JUDY ANNE MIKOVITS,  
Plaintiff,

vs.

ADAM GARCIA, JAIME  
MCGUIRE, RICHARD  
GAMMICK, GEOFF DEAN,  
THREE UNIDENTIFIED  
VENTURA COUNTY SHERIFFS,  
F. HARVEY WHITTEMORE,  
ANNETTE F. WHITTEMORE,  
CARLIE WEST KINNE,  
WHITTEMORE-PETERSON  
INSTITUTE, a Nevada Corporation,  
UNEVX INC., a Nevada  
Corporation, MICHAEL  
HILLERBY, KENNETH HUNTER,  
GREG PARI and VINCENT  
LOMBARDI,

Defendants.

CASE NO. CV14-08909-SVW (PLA)

**ANSWER TO FIRST AMENDED  
COMPLAINT; DEMAND FOR JURY  
TRIAL**

Defendant GEOFF DEAN hereby answers the first amended complaint filed on  
July 27, 2015:

///

///

**RESPONSES TO ALLEGATIONS**

1  
2 1. Defendant admits that plaintiff is proceeding under those theories but  
3 denies their validity in this action.

4 2. Defendant has insufficient information to admit or deny this allegation  
5 and on that basis denies it.

6 3. Defendant objects to the allegations of this paragraph as irrelevant and  
7 has insufficient information to admit or deny these allegations and on that basis  
8 denies them.

9 4. Defendant objects to the allegations of this paragraph as irrelevant and  
10 has insufficient information to admit or deny these allegations and on that basis  
11 denies them.

12 5. Defendant objects to the allegations of this paragraph as irrelevant and  
13 has insufficient information to admit or deny these allegations and on that basis  
14 denies them.

15 6. Defendant objects to the allegations of this paragraph as irrelevant and  
16 has insufficient information to admit or deny these allegations and on that basis  
17 denies them.

18 7. Defendant objects to the allegations of this paragraph as irrelevant and  
19 has insufficient information to admit or deny these allegations and on that basis  
20 denies them.

21 8. Defendant objects to the allegations of this paragraph as irrelevant and  
22 has insufficient information to admit or deny these allegations and on that basis  
23 denies them.

24 9. Defendant objects to the allegations of this paragraph as irrelevant and  
25 has insufficient information to admit or deny these allegations and on that basis  
26 denies them.

27 10. Defendant objects to the allegations of this paragraph as irrelevant and  
28 has insufficient information to admit or deny these allegations and on that basis

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denies them.

11. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

12. Defendant admits the allegations of this paragraph.

13. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

14. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

15. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

16. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

17. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

18. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

19. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

20. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis

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1 denies them.

2 21. Defendant objects to the allegations of this paragraph as irrelevant and  
3 has insufficient information to admit or deny these allegations and on that basis  
4 denies them.

5 22. Defendant objects to the allegations of this paragraph as irrelevant and  
6 has insufficient information to admit or deny these allegations and on that basis  
7 denies them.

8 23. Defendant objects to the allegations of this paragraph as irrelevant and  
9 has insufficient information to admit or deny these allegations and on that basis  
10 denies them.

11 24. Defendant objects to the allegations of this paragraph as irrelevant and  
12 has insufficient information to admit or deny these allegations and on that basis  
13 denies them.

14 25. Defendant objects to the allegations of this paragraph as irrelevant and  
15 has insufficient information to admit or deny these allegations and on that basis  
16 denies them.

17 26. Defendant objects to the allegations of this paragraph as irrelevant and  
18 has insufficient information to admit or deny these allegations and on that basis  
19 denies them.

20 27. Defendant objects to the allegations of this paragraph as irrelevant and  
21 has insufficient information to admit or deny these allegations and on that basis  
22 denies them.

23 28. Defendant objects to the allegations of this paragraph as irrelevant and  
24 has insufficient information to admit or deny these allegations and on that basis  
25 denies them.

26 29. Defendant objects to the allegations of this paragraph as irrelevant and  
27 has insufficient information to admit or deny these allegations and on that basis  
28 denies them.

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1       30. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4       31. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7       32. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10       33. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13       34. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16       35. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19       36. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22       37. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25       38. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28       ///

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1           39. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4           40. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7           41. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10          42. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13          43. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16          44. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19          45. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22          46. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25          47. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28       ///

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1       48. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4       49. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7       50. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10       51. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13       52. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16       53. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19       54. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22       55. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25       56. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28       ///



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1       57. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4       58. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7       59. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10       60. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13       61. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16       62. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19       63. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22       64. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25       65. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28       ///



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1           66. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4           67. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7           68. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10          69. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13          70. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16          71. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19          72. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22          73. Defendants deny the allegations of this paragraph; the events described  
23 in the complaint were exclusively the operation of the City of Ventura Police  
24 Department, and in no way involved the defendant or his office. No personnel of the  
25 Ventura County Sheriff's Office, nor Sheriff Dean, played any role in the events  
26 described in the First Amended Complaint, other than receiving plaintiff for booking  
27 when brought to jail by the Ventura Police Department.

28       ///

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1       74. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them, except that plaintiff was received for booking by the jail operated by the  
4 Sheriff's Office.

5       75. Defendant objects to the allegations of this paragraph as irrelevant and  
6 has insufficient information to admit or deny these allegations and on that basis  
7 denies them.

8       76. Defendant denied the allegations of the first 20 words but admits those  
9 following, except that it was not five days, it was four days and two hours.

10       77. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13       78. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16       79. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19       80. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22       81. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25       82. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

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1       83. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4       84. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7       85. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10       86. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13       87. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16       88. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19       89. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22       90. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25       91. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28 ///

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1           92. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4           93. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7           94. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10          95. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13          96. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16          97. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19          98. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22          99. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25          100. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28       ///

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101. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

102. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

103. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

104. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

105. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

106. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

107. Defendant admits the allegations of this paragraph.

108. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

109. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

110. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

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1 111. Defendant objects to the allegations of this paragraph as irrelevant and  
2 has insufficient information to admit or deny these allegations and on that basis  
3 denies them.

4 112. Defendant objects to the allegations of this paragraph as irrelevant and  
5 has insufficient information to admit or deny these allegations and on that basis  
6 denies them.

7 113. Defendant objects to the allegations of this paragraph as irrelevant and  
8 has insufficient information to admit or deny these allegations and on that basis  
9 denies them.

10 114. Defendant objects to the allegations of this paragraph as irrelevant and  
11 has insufficient information to admit or deny these allegations and on that basis  
12 denies them.

13 115. Defendant objects to the allegations of this paragraph as irrelevant and  
14 has insufficient information to admit or deny these allegations and on that basis  
15 denies them.

16 116. Defendant objects to the allegations of this paragraph as irrelevant and  
17 has insufficient information to admit or deny these allegations and on that basis  
18 denies them.

19 117. Defendant objects to the allegations of this paragraph as irrelevant and  
20 has insufficient information to admit or deny these allegations and on that basis  
21 denies them.

22 118. Defendant objects to the allegations of this paragraph as irrelevant and  
23 has insufficient information to admit or deny these allegations and on that basis  
24 denies them.

25 119. Defendant objects to the allegations of this paragraph as irrelevant and  
26 has insufficient information to admit or deny these allegations and on that basis  
27 denies them.

28 ///

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120. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

121. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

122. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

123. Defendant denies all of these wrongful incarceration charges, but as to the rest, has insufficient information to admit or deny them and on that basis denies them.

124. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

125. Defendant objects to the allegations of this paragraph as irrelevant and has insufficient information to admit or deny these allegations and on that basis denies them.

126. Defendant incorporates the responses to the preceding paragraphs as though fully set forth hereat.

127. Defendant admits that plaintiff is so alleging, but denies the validity thereof.

128. Defendant denies the allegations of this paragraph.

129. Defendant denies the allegations of this paragraph.

130. Defendant objects to the allegations of this paragraph as unintelligible but without waiving the objection, denies them.

131. Defendant denies any participation in the complaint's operative events as explained to plaintiff's counsel in the letter and attached Miller declaration of June



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24, 2015.

132. Defendant denies the allegations of this paragraph, as the above paragraph, because defendant and his department played no role at all in the complaint's operative events, as described in the above-referenced Miller declaration.

133. Defendant denies the allegations of this paragraph.

134. Defendant denies the allegations of this paragraph.

135. Defendant objects to the allegations of this paragraph as irrelevant, but without waiving this objection, deny the allegations of this paragraph.

136. Defendant incorporates the responses to the preceding paragraphs as though fully set forth hereat.

137. Defendant denies the allegations of this paragraph.

138. Defendant denies the allegations of this paragraph.

139. Defendant denies the allegations of this paragraph.

140. Defendant denies the allegations of this paragraph.

141. Defendant denies the allegations of this paragraph.

142. Defendant denies the allegations of this paragraph.

143. Defendant incorporates the responses to the preceding paragraphs as though fully set forth hereat.

144. Defendant denies the allegations of this paragraph.

145. Defendant and his department played no role in securing or executing the subject warrant and so have insufficient information to admit or deny the allegations of this paragraph and on that basis deny them.

146. Defendant denies the allegations of this paragraph.

147. Defendant denies the allegations of this paragraph.

148. Defendant incorporates the responses to the preceding paragraphs as though fully set forth hereat.

149. Defendant denies the allegations of this paragraph.

150. Defendant denies the allegations of this paragraph.

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1 151. Defendant denies the allegations of this paragraph.

2 152. Defendant incorporates the responses to the preceding paragraphs as  
3 though fully set forth hereat.

4 153. Defendant denies the allegations of this paragraph.

5 154. Defendant denies the allegations of this paragraph.

6 155. Defendant denies the allegations of this paragraph.

7 156. Defendant incorporates the responses of the preceding paragraphs as  
8 though fully set forth hereat.

9 157. Defendant denies the allegations of this paragraph.

10 158. Defendant denies the allegations of this paragraph.

11 159. Defendant denies the allegations of this paragraph.

12 160. Defendant incorporates the responses of the preceding paragraphs as  
13 though fully set forth hereat.

14 161. Defendant has insufficient information to admit or deny the allegations  
15 of this paragraph, and on that basis, denies them.

16 162. Defendant denies the allegations of this paragraph.

17 163. Defendant denies the allegations of this paragraph.

18 164. Defendant denies the allegations of this paragraph.

19 165. Defendant incorporates the responses of the preceding paragraphs as  
20 though fully set forth hereat.

21 166. Defendant denies the allegations of this paragraph.

22 167. Defendant denies the allegations of this paragraph.

23 168. Defendant denies the allegations of this paragraph.

24 169. Defendant denies the allegations of this paragraph.

25 170. Defendant denies the allegations of this paragraph.

26 171. Defendant incorporates the responses of the preceding paragraphs as  
27 though fully set forth hereat.

28 172. Defendant denies the allegations of this paragraph.

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173. Defendant denies the allegations of this paragraph.

174. Defendant denies the allegations of this paragraph.

175. Defendant denies the allegations of this paragraph.

176. Defendant denies the allegations of this paragraph.

177. Defendant incorporates the responses of the preceding paragraphs as though fully set forth hereat.

178. Defendant denies the allegations of this paragraph.

179. Defendant denies the allegations of this paragraph.

180. Defendant denies the allegations of this paragraph.

181. Defendant incorporates the allegations of the preceding paragraphs as though fully set forth hereat.

182. Defendant denies the allegations of this paragraph.

183. Defendant denies the allegations of this paragraph.

184. Defendant denies the allegations of this paragraph.

185. Defendant denies the allegations of this paragraph.

186. Defendant denies the allegations of this paragraph.

### **AFFIRMATIVE DEFENSES**

1. The defendant is protected by the application of the qualified immunity, in that there are no such rights as are asserted against him, he did not violate the plaintiff's constitutional rights and such rights were not clearly established in the circumstances confronting him.

2. The defendant, as head of his agency, is an unnecessary supernumerary party and should not be the real party in interest, within the meaning of *Kentucky v. Graham*, 473 U.S. 159, 165-167 (1985).

3. The defendant and his agency, the Ventura County Sheriff's Office, played no part in the events described in the first amended complaint, as the entire operation was that of a separate law enforcement agency, the City of Ventura Police Department, as clarified with a declaration by defense counsel's June 24, 2015, letter

1 to plaintiff's attorneys.

2 4. The action is time barred, in that more than two years had elapsed from  
3 the plaintiff's release from custody until the filing of the present suit; the statute of  
4 limitation for the forum state is two years, *Jackson v. Barnes*, 749 F.3d 755, 761 (9<sup>th</sup>  
5 Cir. 2014).

6 5. The defendant and his agency did not promulgate, ratify or adopt a  
7 deliberately indifferent custom, practice or policy in violation of plaintiff's federally  
8 protected rights.

9 **DEMAND FOR JURY TRIAL**

10 In the event that a pre-trial or trial dismissal motion is not made or made and  
11 denied, defendant requests a trial by jury.

12  
13 DATED: August 10, 2015

WISOTSKY, PROCTER & SHYER

14  
15 By: 

16 Jeffrey Held  
17 Attorneys for Defendant  
18 GEOFF DEAN  
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20  
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