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5 Attorneys for Defendants County of San Diego, William D. Gore, Jan Caldwell,
Thomas Seiver, Brendan Cook, Jesse Allensworth, James Breneman, Michael Proctor,
6 San Diego County Sheriff's Department and Bonnie Dumanis

7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10
11 AMERICAN NEWS AND INFORMATION)
SERVICES, INC., a Connecticut Corporation;)
12 EDWARD A. PERUTA; and JAMES C.)
PLAYFORD,)

13 Plaintiffs,

14 v.

15 WILLIAM D. GORE, individually and in his)
official capacity as San Diego County Sheriff;)
16 JAN CALDWELL, individually and in her)
official capacity as San Diego County)
17 Sheriff's Department Public Affairs Director;)
THOMAS SEIVER,)
18 San Diego County Sheriff's Department)
Deputy, individually; BRENDAN COOK,)
19 San Diego County Sheriff's Department)
Deputy, individually; JESSE)
20 ALLENSWORTH, San Diego County)
Sheriff's Department Deputy, individually;)
21 JAMES BRENEMAN, San Diego County)
Sheriff's Department Deputy, individually;)
22 MICHAEL PROCTOR, San Diego County)
Sheriff's Department Deputy, individually;)
23 JOHN DOE 1-10; San Diego County Sheriff's)
Department; WILLIAM LANSDOWNE,)
24 individually and in his official capacity as San)
Diego Police Chief; JOHN DOE 1-10; San)
25 Diego Police Department; and BONNIE)
DUMANIS, individually and in her official)
26 capacity as San Diego County District)
Attorney; JOHN DOE 1-10; San Diego)
County District Attorney's Office,)
27 individually,

28 Defendants.

No. 12-cv-2186-BEN(KSC)

DECLARATION OF JEFF DUCKWORTH
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT

Date: April 22, 2016
Time: 10:30 a.m.
Dept.: 5A - Courtroom of the
Honorable Roger T. Benitez
Trial Date: None

1 I, JEFF DUCKWORTH, declare as follows:

2 1. I am a Lieutenant assigned to the San Diego County Sheriff Department's
3 Internal Affairs Unit.

4 2. I researched the Internal Affairs database and found that in 2010, James
5 Playford filed three Internal Affairs complaints, none of which involved Deputy Thomas
6 Seiver.

7 3. Complaint filed No. 2010-C-031 was filed in February 2010 against Deputy
8 Luis Carrillo for a matter that occurred in 2009.

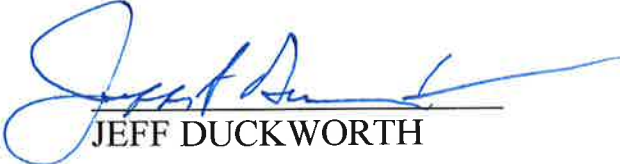
9 4. Complaint filed No. 2010-C-151 was filed in September 2010 against
10 Deputy Michael McNeill.

11 5. Complaint file No. 2010-027.1 was filed in February 2010 against Deputy
12 Jason Rothline.

13 6. I did not find any complaints by Mr. Playford involving Thomas Seiver at
14 any time.

15 I declare under penalty of perjury under California law that the foregoing is true
16 and correct.

17 Executed in San Diego, California, March 18, 2016.

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JEFF DUCKWORTH