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PHILIP L. REZNIK, SBN 204590
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5

(SPACE BELOW FOR FILING STAMP ONLY)

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA
7 COUNTY OF LOS ANGELES

8 OMAR RODRIGUEZ; CINDY GUILLEN-
GOMEZ; STEVE KARAGIOSIAN;
9 ELFEGO RODRIGUEZ; AND JAMAL
CHILDS,

10 Plaintiffs,

11 -vs-

12 BURBANK POLICE DEPARTMENT;
13 CITY OF BURBANK; TIM STEHR;
KERRY SCHILF; JAMIE "J.J." PUGLISI;
14 DAN YADON; KELLY FRANK; PAT
LYNCH; MIKE PARRINELLO; AARON
15 KENDRICK; DARIN RYBURN; AND
DOES 1 THROUGH 100, INCLUSIVE.

16 Defendants.
17

CASE NO: BC 414602
[Assigned to Hon. Joanne O'Donnell,
Dept. 37]

**SUPPLEMENTAL DESIGNATION
OF EXPERT WITNESSES AND
DECLARATION OF PHILIP L.
REZNIK**

Action filed: May 28, 2009

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19 TO PLAINTIFF CINDY GUILLEN-GOMEZ ("PLAINTIFF") AND HER
20 ATTORNEY OF RECORD

21 Defendant CITY OF BURBANK including the Burbank Police Department
22 ("Defendant") hereby submits this supplemental expert witness list pursuant to Code Civ.
23 Proc. § 2034.280.

24 1. Defendant may call James R. High, M.D. as an expert witness regarding
25 Plaintiff's alleged emotional and psychological damages.

26 2. Defendant may call David H. Hinig as an expert witness regarding police
27 department policies and procedures.

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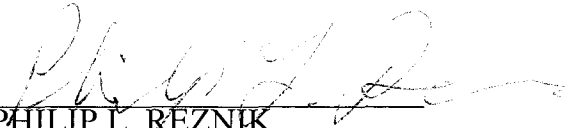
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3. Defendant retains the right to designate and/or counter-designate expert witnesses in the future in accordance with applicable statutory provisions.

4. In addition, Defendant may Thomas Hoefel and Tim Stehr as non-retained expert witnesses regarding police department policies and procedures

5. Defendant reserves the right to call at trial any and all expert witnesses designated by Plaintiff, and any and all expert witnesses Defendant deems appropriate for purposes of rebuttal or impeachment.

DATED: March 14, 2011 BALLARD ROSENBERG GOLPER & SAVITT, LLP

By: 
PHILIP L. REZNIK
Attorneys for the CITY OF BURBANK

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DECLARATION OF PHILIP L. REZNIK

I, Philip L. Reznik, declare as follows:

1 I am an attorney at law duly authorized to practice before all of the Courts of the State of California and am an associate in the law firm of Ballard, Rosenberg, Golper & Savitt, LLP, attorneys of record for Defendant CITY OF BURBANK including the Burbank Police Department ("Defendant").

2 The following information regarding Defendant's designated expert witnesses is provided in compliance with Code of Civil Procedure § 2034.260(c).

RETAINED EXPERTS

3. **JAMES R. HIGH, M.D.**, 501 Santa Monica Boulevard, Suite 400, Santa Monica, California 90401,(310) 395-8711.

- a. A copy of Dr. High's Curriculum Vitae is attached hereto as Exhibit "A" and incorporated as part of this expert witness designation.
- b. Dr. High will testify regarding psychological issues related to the claims of Plaintiff Cindy Guillen-Gomez ("Plaintiff"), including but not limited to, the nature and extent of the psychological or emotional injuries which Plaintiff attributes to the actions of Defendant, the extent that causes other than the actions of Defendant may have attributed to her alleged injuries; and the extent of treatment reasonably required by the Plaintiff, if any. Dr. High will also render opinions with respect to the testimony of Plaintiff's expert witnesses which fall within his area of expertise.
- c. Dr. High's fees for deposition and trial testimony are \$600.00 per hour, or any part thereof, with a minimum of one-half day (\$2,500) for trial testimony.

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d. This expert has agreed to testify at trial in this matter. He will be sufficiently familiar with the pending action to submit to a meaningful deposition concerning his specific testimony, including any opinion and its basis, that he is expected to give at trial, once Plaintiff has been examined and tested by Dr. High and Dr. High has had a reasonable amount or time to prepare a report after the examination and scoring of tests.

4. **DAVID H. HINIG**, 639 Willow Grove Ave., Glendora, CA 91741, (626) 963-6941.

e. A copy of Mr. Hinig's Curriculum Vitae is attached hereto as Exhibit "B" and incorporated as part of this expert witness designation.

f. Mr. Hinig will testify with regard to police department operations, including but not limited to, department policies, practices, procedures, work environment and training. Mr. Hinig will also render opinions with respect to the testimony of Plaintiff's expert witnesses which fall within his expertise.

g. Mr. Hinig's fees for deposition and trial testimony are \$295.00 per hour, with a four-hour minimum.

h. This expert has agreed to testify at trial in this matter. He will be sufficiently familiar with the pending action to submit to a meaningful deposition concerning his specific testimony, including any opinion and its basis, that he is expected to give at trial, within a reasonable period after being apprised of the general substance of the testimony that Plaintiff's designated police expert is expected give in compliance with Code of Civil Procedure § 2034.260(c)(2).

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NON-RETAINED EXPERTS

5. Thomas Hoefel

6. Tim Stehr

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 14th day of March, 2011 at Glendale, California.


PHILIP L. REZNIK

EXHIBIT A

CURRICULUM VITAE

Name: James R. High, M.D.
Date of Birth: February 20, 1943
Tax ID #: 95-3368335
Office Address: 501 Santa Monica Boulevard, Suite 400
Santa Monica, California 90401
Office Telephone: (310) 395-8711
Specialty: Adult Psychiatry

EDUCATION:

- . Indiana University, Bloomington, Indiana - B.A., Medical Science 1965
- . Indiana University School of Medicine - Doctor of Medicine 1968
- . Los Angeles County-University of Southern California Medical Center
- Internship 1968-1969
- . Los Angeles County-University of Southern California Medical Center,
Resident in Psychiatry 1969-1972
- . Chief Resident in Psychiatry, Los Angeles County-University of Southern
California Medical Center 1971-1972

LICENSURE:

Physician and Surgeon's License (State of California #C31416)
DEA Narcotics License #AH 4401256
Qualified Medical Evaluator - Psychiatry - State of California #001489 (1996-
1998)

BOARD CERTIFICATION:

Diplomate, American Board of Psychiatry and Neurology --
Psychiatry, April, 1976. Certificate No. 14829

ACADEMIC APPOINTMENTS:

- . Clinical Professor of Psychiatry --
University of Southern California Keck School of Medicine --
1976 to present

CURRENT PROFESSIONAL ACTIVITIES:

- . Private Practice -- Full time, 1972 to present
- . Supervision of Senior Residents of Los Angeles County --
USC Medical Center, 1988 to present
- . Teach Seminars and Supervise in USC Traumatic Stress Clinic - 2001 to present
Department of Psychiatry, LAC-USC Medical Center, 1993 to present

PAST PROFESSIONAL ACTIVITIES:

- . Psychiatric Consultant – Los Angeles County Metropolitan Transit Authority --
Traumatic Injury Program, 1990 to 2002.
- . Taught seminar weekly on interview techniques and psychiatric diagnostic
evaluations to USC medical students – 1977 to 1988
- . Director of Adult Psychiatry – Western Institute of Human Resources – 1972.
- . Staff Psychiatrist – California Department of Corrections Adult Parole Outpatient
Clinic – Los Angeles – 1971-1972.

HOSPITAL AFFILIATIONS:

- . LAC/USC Medical Center - Member, Professional Staff Association

PROFESSIONAL SOCIETY MEMBERSHIPS:

- . American Psychiatric Association (Life Fellow)
- . Southern California Psychiatric Society
- . California Psychiatric Association
- . The International Society for Traumatic Stress Studies
- . American Academy of Psychiatry and the Law
- . Academy of Psychosomatic Medicine
- . Society for Personality Assessment

PUBLICATIONS:

- . High, J.R. (1999) Deception through Factitious Identity. Journal of Psychiatry and Law, 27, 483-547.
- . High, J.R. & Armstrong, J. (1999). Guidelines for Differentiating Malingering from PTSD. National Center for PTSD Clinical Quarterly, 8(3), 46-47.
- . Southwick, S.M., Morgan, C.A., Charney, D.S. & High, J.R. (1999). Yohimbine Use in a Natural Setting: Effects on Posttraumatic Stress Disorder. Journal of Biological Psychiatry, 442-444.
- . High, J.R. & Armstrong, J.G. A Case of PTSD in Casebook for Abnormal Psychology. Edited by Irving Weiner. Wiley, (2003), 137-153.

PRESENTATIONS:

- . High, J.R., Armstrong, J. & Saks, E. (November 7-10, 2002). Forensic Evaluations of Complex Trauma Cases in Civil Litigation. ISTSS 18th Annual Meeting, Baltimore, MD.
- . High, J.R., Dalenberg, C. & Armstrong, J. (November 7-10, 2002). Counter Transference in Complex PTSD. ISTSS 18th Annual Meeting, Baltimore, MD.
- . High, J.R. (July 12, 2000). Factitious Identity Disorder. Presented In Symposium - False Memory and False Litigants. XXV Congress International Academy of Law and Mental Health, Siena, Italy.

- . High, J.R. (November 20-23, 1998). Trauma Deception and Impaired Attachment. In Symposium; True Lies, False Memories in Munchausen's Syndrome, Dissociation & Trauma. Ending Cycles of Violence, XIV Annual Meeting, International Society for Traumatic Stress Studies, Washington, D.C.

- . High, J.R., Armstrong, J.G. & Dahlenberg, C. (November, 1997). Management and Treatment of Dissociative Symptoms in Post-Traumatic Stress Disorder Patients. Invited Institute, Annual Meeting, International Society for Traumatic Stress Studies, Montreal, Canada.

- . High, J.R. (1997). "Doyle v. Superior Court of Santa Clara County" - Implications for Civil Litigation in California. Biannual Meeting, American Academy of Psychiatry and Law, Southern California Chapter.

EXHIBIT B

RESUME

DAVID H. HINIG

Retired Police Chief – City of Arcadia

Interim Chief of Police

Law Enforcement Management Consultant

PERSONAL INFORMATION:

Name: David H. Hinig
E-mail: dhinig@roadrunner.com

BACKGROUND:

I retired as Chief of Police for the City of Arcadia on July 1, 2005. On August 9, 2005, I was appointed as Interim Chief of Police for the City of Sierra Madre. I served in that capacity until March 16, 2006 when a full-time Chief was appointed. On January 23, 2007 I was retained as a management consultant for Sierra Madre Police to work on personnel, planning and executive recruitment for the department. That work was completed on April 9, 2007.

From January 5, 2009 until January 6, 2010, I served as Interim Police Chief for the City of La Habra. Subsequently, due to an unexpected retirement, I was retained for a second time to oversee La Habra PD from July 12, 2010 through November 9, 2010.

Overlapping during my time as an Interim Chief, I also performed expert witness service for three different law firms specializing in defense of local government entities, completing my most recent case on February 10, 2010.

As a police chief, I performed the customary duties of departmental oversight, as well as interacting with city managers, elected officials and community members. I prepared detailed staff reports; including articulation of concepts dealing with contract law enforcement services, annual reports, budget management, personnel actions, recruitment and retention of staff, and memoranda of understanding with labor groups. I also conducted comprehensive professional standards compliance reviews. My total law enforcement experience exceeds 44 years. When not engaged with police agencies, I work as an independent management consultant.

EDUCATION AND TRAINING:

Graduate - Azusa Pacific University, Bachelor of Science Degree in Applied Business Management. Awarded Magna Cum Laude Honors.

Graduate - FBI National Academy, 166th Session.

Graduate - Pasadena Community College - Associate in Arts Degree in Police Science.

Certificate in Emergency Management - University of California, Riverside.

Page 2

Graduate - P.O.S.T. Executive Development Course - California Polytechnic University, Pomona.

Completed over 2900 hours of professional training in management, law enforcement, and specialty areas.

PROFESSIONAL CERTIFICATES:

P.O.S.T. Executive	Issued January 16, 2002 - #E832
P.O.S.T. Management	Issued February 3, 1984 - #M2327
P.O.S.T. Supervisory	Issued November 9, 1983 - #S09072
P.O.S.T. Advanced	Issued May 5, 1977 - #A2545
P.O.S.T. Intermediate	Issued December 6, 1971 (Prior to Numbers)
P.O.S.T. Basic	Issued November 13, 1968 (Prior to Numbers)

EXPERIENCE:

City of La Habra

Interim Police Chief: July 12, 2010 to November 9, 2010

I was retained for a second time to oversee La Habra PD after the unexpected retirement of their new Chief. I again performed full oversight of the agency and assisted in the recruitment and selection process of another Chief, including ensuring the orderly transition of leadership.

Law Offices of the Zappia Law Firm

333 South Hope St. 35th Floor

Los Angeles, CA 90071

Expert Witness: September 21, 2009 to February 10, 2010

Chavez vs. City of Los Angeles

City of La Habra

Interim Police Chief: January 5, 2009 to January 6, 2010

As Interim Chief, I oversaw all aspects of Departmental operations involving the 108 full-time personnel employed by the agency. This included administering an operating budget exceeding \$15 million dollars. I also was responsible for the City's Animal Control Department, and Emergency Ambulance Service Program.

Law Offices of Jackson Lewis LLP

725 S. Figueroa St., Suite 2500

Los Angeles, CA 90017-5408

Expert Witness: June 18, 2008 to February 2009

Hill, et al vs. City of Desert Hot Springs

Page 3

**Law Offices of Ballard Rosenberg Golper & Savitt LLP –
10 Universal City Plaza, Sixteenth Floor
Universal City, CA 91608-1097**

Expert Witness: February 18, 2007 to April 24, 2007
Hernandez, et al vs. City of South Gate

City of Sierra Madre –

Management Consultant: January 23, 2007 to April 9, 2007
Interim Police Chief: August 9, 2005 to March 16, 2006

City of Arcadia –

Chief of Police: September 12, 1999 to June 30, 2005

As Chief of Police, I was responsible for guiding and directing the 119 men and women who provide law enforcement service to the City of Arcadia. I planned and administered a budget exceeding \$11.5 million dollars. I was responsible for the development of policies and procedures as well as initiating programs and operations to enhance community safety and service.

During my tenure I also had coordinating and oversight responsibility for the construction and transition to a new \$16 million dollar police facility.

Police Captain: July 6, 1986 to September 11, 1999

As a police captain, I commanded both the Uniform and Administrative Divisions of the Department. While commanding the Administrative Division I had oversight of the 54 men and women assigned to investigation, narcotics enforcement, D.A.R.E., crime prevention, recruitment, training, and other support related activities. As Uniform Division Commander, I directed operations of all patrol, traffic, jail, and crime analysis personnel.

In my capacity as a captain, I oversaw training for the Department in the areas of sexual harassment, hostile work environment, and cultural diversity. I wrote the Department policies and training bulletins pertaining to use of force, restraint application, less lethal weapons, Colt M-16 patrol rifle deployment, vehicular pursuits, domestic violence, Type 1 jail operations, and a number of other issues facing contemporary police managers.

Police Lieutenant: December 13, 1981 to July 5, 1986

As a lieutenant, I served at various times as a patrol watch commander, commander of the Investigation Section, commander of Internal Affairs investigations, and Administrative Assistant to the Chief of Police.

In 1984, I was the Department representative at the Olympic Security Coordinating

Page 4

Center in Los Angeles where my responsibility was interagency coordination with over 100 allied agencies for security and threat analysis.

Police Sergeant: May 6, 1979 to December 12, 1981

While working as a sergeant, I served in several functions including; patrol field supervisor, relief watch commander, supervisor of the Records Bureau, Training/Professional Standards, and Investigation Section supervisor. Additionally, I spent 4 ½ months on assignment to the Culver City Police Department as a major fraud investigator. While with Culver City, I also conducted an administrative evaluation of operations for Culver City Chief of Police Ted Cook.

Police Agent: March 3, 1974 to May 5, 1979

In the position of agent, I worked in the Investigation Section where I was a narcotics investigator and court qualified narcotics expert. Additional assignments in the Investigation Section included; fraud, major crimes against persons, robbery and homicide. In the Uniform Division, I was a field training officer and field supervisor.

Police Officer: October 19, 1967 to March 2, 1974

While working as a police officer, I performed the various tasks required of patrol personnel. I was also a training officer and instructor with the Officer-On-Campus program. I helped to develop, and was one of the original participants in the Department's Civilian Ride-Along program.

Police Cadet: November 28, 1966 to October 18, 1967

I was the first police cadet for the City of Arcadia. As a cadet, my primary assignments were in support services where I handled clerical tasks.

PROFESSIONAL ORGANIZATIONS AND MEMBERSHIPS:

Member – International Association of Chiefs of Police (IACP)
Member – California Police Chiefs Association (CPCA)
Member – California Police Officers Association (CPOA)
Member – Retired Peace Officers Research Association of California (RPORAC)
Member – Retired Peace Officers Association of California (RPOAC)
Past Member – Orange County Police Chiefs and Sheriff's Association
Retired Member – Los Angeles County Police Chiefs Association
Past President & Member – San Gabriel Valley Police Chiefs Association
Operations & Policy Committee Member L.A. County Inter-Agency Council on Child Abuse and Neglect (ICAN)
Past President & Board Member - Foothill Air Support Team JPA (FAST)

Page 5

Past Executive Board Member - Foothill Special Enforcement Team (FSET)
Member - Arcadia Chamber of Commerce
Member - FBI National Academy Associates
Member - Peace Officers Association of Los Angeles County (POLAC)
Member - San Gabriel Valley Peace Officers Association
Past Member – San Gabriel Valley Commanders Association
Past Member - Rio Hondo Police Academy Advisory Committee
Past Chairman - Rio Hondo Academy Training Hours Allocation Committee
Past Member & Co-Chair L.A. County Regional Tactical Communications
Committee (LARTCS)
Past Member Board of Corrections Steering Committee for Standards & Training

PROOF OF SERVICE

I am a citizen of the United States, and am employed in the County of Los Angeles in the office of a member of the bar of this Court at whose directions this service was made. I am over the age of 18, and not a party to the within action. My business address is Ballard, Rosenberg, Golper & Savitt, 500 North Brand Boulevard, Twentieth Floor, Glendale, California 91203-9946.

On March 14, 2011, I served the foregoing document described as:
SUPPLEMENTAL DESIGNATION OF EXPERT WITNESSES AND DECLARATION OF PHILIP L. REZNIK
on the interested parties in this action, by placing a true copy thereof in a sealed envelope addressed as follows:

Solomon E. Gresen, Esq.
Steven V. Rheuban, Esq.
Law Offices of Rheuban & Gresen
15910 Ventura Boulevard, Suite 1610
Encino, CA 91436
Tel: (818) 815.2727
Fax: (818) 815-2737
seg@rglawyers.com
Attorneys for Plaintiffs

Carol A. Humiston
Senior Assistant City Attorney
City of Burbank
275 E. Olive Avenue
Burbank, CA 91510
Telephone: (818) 238-5707
Facsimile: (818) 238-5724
chumiston@ci.burbank.ca.us
Attorney for Defendant

Lawrence A. Michaels, Esq.
Sarah T. Wirtz, Esq.
Veronica T. Von Grabow, Esq.
Mitchell Silberberg & Knupp
11377 W. Olympic Blvd.
Los Angeles, CA 90064
Tel: (310) 312-2000
Fax: (310) 312-3100
lam@msk.com
stw@msk.com
vtv@msk.com
Attorneys for Defendant

_____ **VIA FACSIMILE;** and

_____ **(BY FEDEX)** I am "readily familiar" with the firm's practice of collection and processing correspondence for delivery by Federal Express. Under that practice, in the ordinary course of business, it would be deposited with Federal Express on that same day with directions for next day delivery, with the Federal Express fees guaranteed to be paid by Ballard, Rosenberg, Golper & Savitt, LLP.

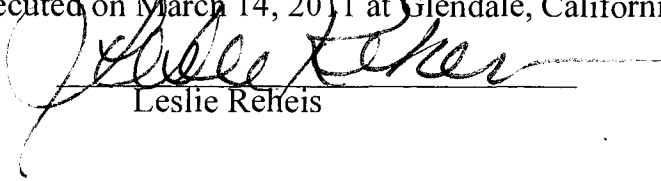
 X **(BY ELECTRONIC MAIL)** I sent the above-mentioned documents via electronic mail addressed as set forth above.

 X **(BY MAIL)** and personally placing such envelope with postage fully prepaid for collection and mailing on the above-referenced date following the ordinary business practices of this office. I am readily familiar with our office's practice for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence, including said envelope, will be deposited with the United States Postal Service at Glendale on the above-referenced date.

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(BY PERSONAL SERVICE) I delivered such envelope(s) by hand to the above-addressee(s).

I declare under penalty of perjury that the foregoing is true and correct under the laws of the State of California. Executed on March 14, 2011 at Glendale, California.


Leslie Reheis