

1 JOHN THOMAS CHRISTIANA
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2 Laguna Beach, CA 92651
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4 By: John Thomas Christiana, Pro Se

ELECTRONICALLY FILED
Superior Court of California,
County of Orange

08/08/2018 at 10:56:00 PM

Clerk of the Superior Court
By e Clerk, Deputy Clerk

5 SUPERIOR COURT OF THE STATE OF CALIFORNIA
6 FOR THE COUNTY OF ORANGE
7

8 JOHN THOMAS CHRISTIANA,
9 Plaintiff,

10 vs.

11 CITY OF LAGUNA BEACH, JASON
12 FARRIS, COUNTY OF ORANGE,
13 WILLIAM CRITTENDEN,

14 And Does 1 Through 10 Inclusive,
15 Defendants.
16
17

) CASE NO. 30-2018-00975317-CU-NP-CJC
) [Judge Sheila B. Fell, Dept. C25]

) REQUEST FOR JUDICIAL NOTICE IN
) SUPPORT OF OPPOSITION TO
) DEMURRER AND OPPOSITION TO
) MOTION FOR LEAVE TO FILE AMENDED
) COMPLAINTS BY DEFENDANTS CITY OF
) LAGUNA BEACH AND JASON FARRIS TO
) PLAINTIFF JOHN THOMAS CHRISTIANA

) [Filed and Served Concurrently with
) Opposition to Plaintiff's Motion For Leave to
) File Amended Complaints]

) DATE: August 15, 2018
) TIME: 10:00 AM
) DEPT: C25

) Complaint Filed: February 23, 2018
) Trial Date: September 9, 2019

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21 TO THE HONORABLE COURT AND TO DEFENDANTS CITY OF LAGUNA BEACH,
22 JASON FARRIS, AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that pursuant to Evidence Code Section 452 and 453, Plaintiff
24 John Thomas Christiana requests that the Court take judicial notice of the following:

25 **Exhibit A** – Atascadero State Hospital (ASH) Physician's Progress Notes for June 2, 2010 of Dr.
26 Wang, Clinical Team Lead Psychiatrist, regarding Plaintiff John Thomas Christiana.

27 **Exhibit B** – California Supreme Court Docket (Register of Actions) for Case Number S189781,
28 *People v. Christiana.*

1 **Exhibit C** - Positron Emission Tomography (PET) scans from Medical Journal showing the
2 difference between “Normal vs. Schizophrenia Brains.”

3 **Exhibit D** - Positron Emission Tomography (PET) scan of John Thomas Christiana on
4 September 19, 2013 performed by Dr. Jeffrey Dobkin, M.D. California License G-73366, expiry
5 Nov. 30, 2019, Physician and Surgeon, registered with the State of California, Newport Beach,
6 Orange County, California and taken at Long Beach PET Imaging Center, now Memorial Care
7 Imaging Center, prescribed by Long Beach Memorial Care Medical Hospital, Long Beach,
8 California.

9 **Exhibit E** - California Medical Licensed Doctor Report with finding and opinion of “Normal”
10 brain of John Thomas Christiana. Report written by Dr. Jeffrey Dobkin, M.D. California License
11 G 73366, expiry Nov. 30, 2019, Physician and Surgeon, registered Newport Beach, Orange
12 County, California.

13 **Exhibit F** – Prescription that is required by the State of California for Positron Emission
14 Tomography (PET) scan to be performed. Prescription by Dr. Johnny Eguizabal, M.D. California
15 License A-128101, expiry December 31, 2019, Physician and Surgeon, registered in State of
16 California.

17 **Exhibit G** – Orange County Superior Court Case Summary, Case Number 09-48188.

18 Pursuant to Evidence Code section 452(h), the Court can take judicial notice of “Facts
19 and propositions that are not reasonably subject to dispute and are capable of immediate and
20 accurate determination by resort to sources of reasonably indisputable accuracy.”

21 Pursuant to Evidence Code section 453, “The trial court *shall* take judicial notice of any
22 matter specified in Section 452 if a party requests it and (a) Gives each adverse party sufficient
23 notice of the request, through the pleadings or otherwise, to enable such adverse party to prepare
24 to meet the request; and (b) Furnishes the court with sufficient information to enable it to take
25 judicial notice of the matter.

26 This Judicial Notice is to support Plaintiff’s NOTICE OF MOTION AND MOTION
27 FOR LEAVE TO FILE SECOND AND THIRD AMENDED COMPLAINTS, REPLY TO
28 DEFENDANTS’ CITY OF LAGUNA BEACH AND JASON FARRIS OPPOSITION TO
PLAINTIFF JOHN THOMAS CHRISTIANA’S MOTION FOR LEAVE TO FILE SECOND

1 AND THIRD AMENDED COMPLAINTS, AND PLAINTIFF'S OPPOSITION TO
2 DEFENDANTS DEMURRER TO FIRST AMENDED COMPLAINT.

3 This Judicial Notice is relevant and in response to Defendants City of Laguna Beach and
4 Jason Farris ("Defendants") oppositions and demurrer where Defendants make unjustified claims
5 about Plaintiff to discredit Plaintiff to falsely and wrongly argue their case.

6 Further explanation of the exhibits are in the concurrently filed REPLY TO
7 DEFENDANTS' CITY OF LAGUNA BEACH AND JASON FARRIS OPPOSITION TO
8 PLAINTIFF JOHN THOMAS CHRISTIANA'S MOTION FOR LEAVE TO FILE THIRD
9 AMENDED COMPLAINT.

10 For the foregoing reasons, Plaintiff respectfully requests that this Court grant Judicial
11 Notice.

12
13 DATED: August 8, 2018

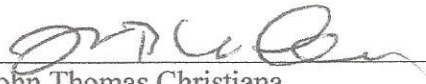
14 
15 John Thomas Christiana
16 Plaintiff in Propria Persona
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EXHIBIT A

DATE TIME NO.

ALL ENTRIES SHALL BE SIGNED WITH NAME AND TITLE

6/2/00
0920

Mr. Christiana sat in the 2nd week team conference.

During the past two weeks, he has been cooperative and compliant in the unit routine even though no medication was prescribed. He functions well on his daily ^{meds}. He reported no psychotic symptoms such as paranoia, hallucinations or delusions. The clinical impression has been that he is competent to stand trial from the 1st day he was admitted to ASH.

He had passed the competency ~~test~~ ^{test} and the mock trial. The treatment team recommend to discharge him back to County jail of Inyo for his trial.

[Signature]

Confidential
Patient's Copy

Confidential Patient/Client Information
See Welfare & Institutions Code
Section 5326 & 4514

MH 5510 (3/01)

CHRISTIANA, JOHN THOMAS
05-063259-9 W
05-20-10 INYO PC 1370
05-06-61 NY WR INYO

PHYSICIAN'S PROGRESS NOTES

CORE RECORD

EXHIBIT B

Appellate Courts Case Information

Supreme Court

Change court

Court data last updated: 08/01/2018 06:46 AM

Docket (Register of Actions)

PEOPLE v. CHRISTIANA

Division SF

Case Number S189781

Date	Description	Notes
01/14/2011	Petition for review filed	Defendant and Appellant: John Thomas Christiana Pro Per
01/14/2011	Record requested	
01/18/2011	Received Court of Appeal record	one doghouse
02/08/2011	Request for depublication (petition for review pending)	Plaintiff and Respondent: The People Attorney: Tracey Lynn Angelopoulos
02/22/2011	Received:	late opposition to depublication request from John Thomas Christiana, petitioner.
02/22/2011	Change of contact information filed for:	John Christiana, petitioner in pro per.
03/01/2011	Time extended to grant or deny review	The time for granting or denying review in the above-entitled matter is hereby extended to and including April 14, 2011, or the date upon which review is either granted or denied.
03/07/2011	Application for relief from default filed	for late response to request for depublication; by John Thoms Christiana, petitioner in pro per.
03/08/2011	Opposition to depublication request filed	*with permission* by John Thomas Christiana, appellant in pro per.
03/17/2011	Note: Mail returned and re-sent	for John Thomas Christiana.
03/23/2011	Petition for review & depublication request (s) denied	The petition for review is denied as moot. The request for an order directing depublication of the opinion in the above-entitled appeal is denied. Kennard, J., is of the opinion the petition should be granted.
03/28/2011	Returned record	1 doghouse

EXHIBIT C

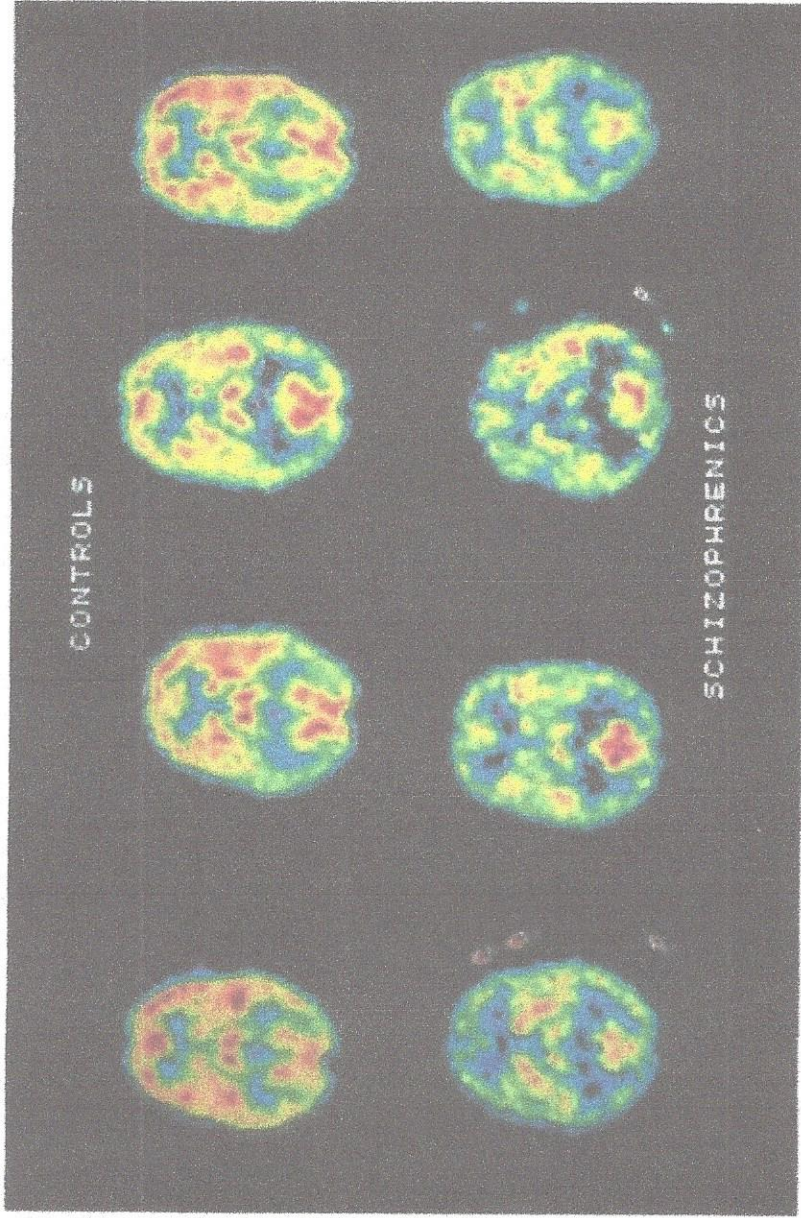
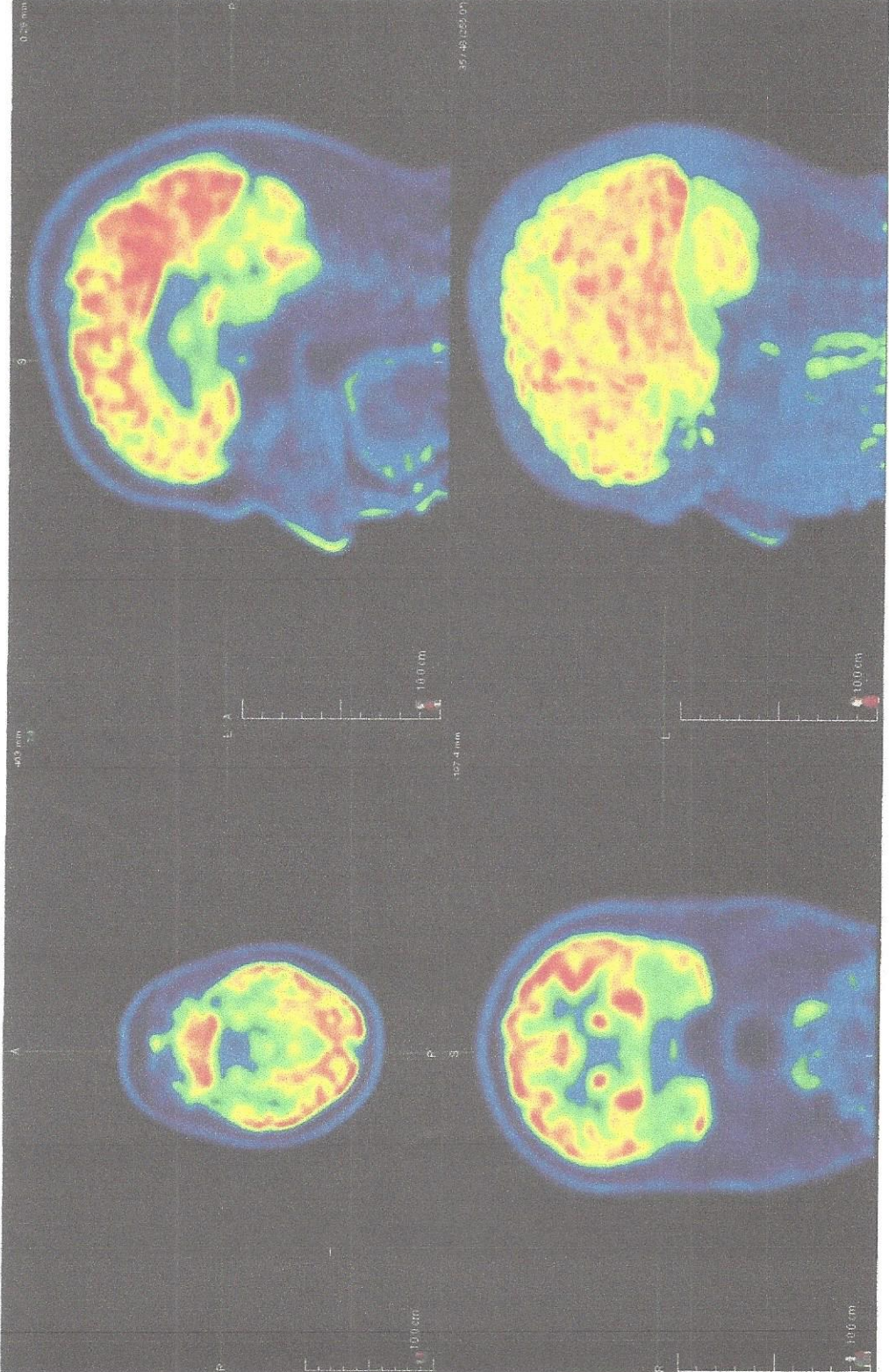


FIGURE 12.4 PET scans of people with schizophrenia versus normals.

EXHIBIT D



Series
PT1
Name CHRISTIANA, JOHN MR.
Modality PET
Series Description PET Brain
Patient ID 461761
Institution Long Beach PET Imaging Center
Tech Name Duy
Acquisition Time 09-19-2013 15:56 PM
Study Date 09-19-2013
Sex M (Male)
Age 52Y
Birth Date 06-06-1961
Weight 75 kg
Series Number 102
Study Description PET-MPETCT_Brain_HD (Adult)
Study ID 174976
Dimensions 336 x 336 x 148
Voxel Size 1.02 x 1.02 x 1.5
Referrer EGUZABAL, JOHNNY EOU4450ES000001
Manufacturer SIEMENS
Model Name 1094
Image Type Original Primary
Orientation Axial
Patient Position HFS
Radioisotope ¹⁸F-Fluorine
Total Dose 11.0 mCi
Injected 15:00 PM
Delta Time 56m 22s
Reconstruction PSF 3CI s
Method
Isotope F18(18F-Fluorine)
Correction Applied none,atm,att,scat,decay
Upper 8.74 SUV/bw
Lower 0 SUV/bw
Value at + 3.45 SUV/bw
Location 0.28, -187.4, -463 (0cm)
Gamma 1

EXHIBIT E

September 19, 2013

CHRISTIANA, John
Dr. Johnny Eguizabal
MRN: 481781
DOB: 06/06/1961

PET/CT SCAN OF THE BRAIN WITH FDG, 09/19/13:

HISTORY: Altered mental status. The current study is being performed to determine the pattern of FDG accumulation in the brain.

TECHNIQUE: The patient's blood glucose level was 107 mg/dl prior to the examination.

The patient was placed in a quiet and darkened room and 11 mCi of fluorine-18 fluorodeoxyglucose were administered intravenously. Approximately 55 minutes following the administration of the radiopharmaceutical, a PET/CT scan of the brain was performed on a Siemens Biograph-40 True Point HD PET/CT scanner with TrueD.

Images were then reviewed in transaxial, coronal, and sagittal planes.

CTDI vol: 64.37
DLP: 1526

COMPARISON: There are no outside anatomic imaging modalities available at this time for comparison.

FINDINGS: There is normal and symmetrical FDG accumulation into the frontal, parietal, occipital, and temporal cortices. The subcortical gray matter is symmetrical in nature as are the cerebellar hemispheres.

OPINION:
NORMAL PET/CT SCAN OF THE BRAIN WITH FDG.

Thank you for referring this patient to our office.



JEFFREY DOBKIN, M.D.

JD/dlg D: 09/20/13 T: 09/20/13

EXHIBIT F



00462

450 E. Spring Street, Suite 1 • Long Beach, CA 90806 • (562) 933-0050 • FAX (562) 933-0078

- RAINBOW CHUNG-OU, M.D.
DEA #FC3425659 LIC. #A122366
- RACHIT DOSHI, M.D.
DEA #FD3502588 LIC. #A122750
- LAURA GUADIANA, M.D.
DEA #FG3553294 LIC. #A123345

- REBECCA HU-YOUNG, D.O.
DEA #FY3551668 LIC. #20A12451
- RICHARD LEE, D.O.
DEA #FL3501980 LIC. #20A12434
- ANA KARINA MELGAR, M.D.
DEA #FM3623556 LIC. #A123619
- KOURTNEY OSORIO, M.D.
DEA #FO3667384 LIC. #A124299
- TALIA LANDAU-SHORR, M.D.
DEA #FS3839125 LIC. #A125530

VOID APPEARS WHEN COPIED

Rx Name John Cristina D.O.B. 6/6/61 Female Male
 Address _____ Phone _____

1) Head PET Scan per patient request. Patient to pay cash.	Quantity: <input type="checkbox"/> 1-24 <input type="checkbox"/> 25-49 <input type="checkbox"/> 50-74 <input type="checkbox"/> 75-100 <input type="checkbox"/> 101-150 <input type="checkbox"/> 151 and over Units Refills _____ NR <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Do not substitute Initial _____
	Quantity: <input type="checkbox"/> 1-24 <input type="checkbox"/> 25-49 <input type="checkbox"/> 50-74 <input type="checkbox"/> 75-100 <input type="checkbox"/> 101-150 <input type="checkbox"/> 151 and over Units Refills _____ NR <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Do not substitute Initial _____
	Quantity: <input type="checkbox"/> 1-24 <input type="checkbox"/> 25-49 <input type="checkbox"/> 50-74 <input type="checkbox"/> 75-100 <input type="checkbox"/> 101-150 <input type="checkbox"/> 151 and over Units Refills _____ NR <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Do not substitute Initial _____

Prescription is VOID if the number of drugs prescribed is not noted 1 2 3

[Signature] Date 9/17/13

NOTE: SECURITY BACKPRINT • NUMBERING • SAFETY PAPER

TouchSafe