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MARIO U. ZAMORA, #258721
CHRISTINA G. Di FILIPPO, #327255
GRISWOLD, LaSALLE, COBB,
DOWD & GIN, L.L.P.
111 E. Seventh Street
Hanford, CA 93230
Telephone: (559) 584-6656
Facsimile: (559) 582-3106
E-mails: zamora@griswoldlasalle.com; difilippo@griswoldlasalle.com
Attorneys for: Defendants, City of Hanford, Hanford Police Department, Parker Sever, Jeff Davis, Stephanie Huddleston

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JASON STINGLEY,
Plaintiff,
vs.
CITY OF HANFORD, CITY OF HANFORD
POLICE DEPARTMENT, PARKER SEVER,
in his individual capacity; JEFF DAVIS, in his
individual capacity; STEPHANIE
HUDDLESTON, in her individual capacity;
AND DOES 1 THROUGH 50, INCLUSIVE,
Defendants.

Case No.: 1:23-cv-00089-BAM

**DEFENDANTS' ANSWER TO SECOND
AMENDED COMPLAINT**

Defendants, CITY OF HANFORD, CITY OF HANFORD POLICE DEPARTMENT,
PARKER SEVER, JEFF DAVIS, and STEPHANIE HUDDLESTON (“**Defendants**”), hereby
answers the Second Amended Complaint filed by JASON STINGLEY (“**Plaintiff**”), as follows:

- 1. Responding to Paragraph 1, Defendants deny said allegations.
- 2. Responding to Paragraph 2, Defendants deny said allegations.

PARTIES

3. Responding to Paragraph 3, Defendants are without sufficient information to
admit or deny the allegations as to the first sentence, and on this basis denies said allegations.
As to the second sentence, Defendants admit that Plaintiff was employed by the City of Hanford.

- 4. Responding to Paragraph 4, Defendants admit said allegations.
- 5. Responding to Paragraph 5, Defendants admit said allegations.

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6. Responding to Paragraph 6, Defendants admit said allegations.

7. Responding to Paragraph 7, Defendants admit said allegations.

8. Responding to Paragraph 8, Defendants admit said allegations.

9. Responding to Paragraph 9, to the extend that this paragraph contains legal contentions, no response from Defendant is required.

10. Responding to Paragraph 10, Defendants admit that they were employed by Defendant City of Hanford and Defendant Hanford Police Department. Defendants are without knowledge of whether all were acting within their scope of employment, and on this basis denies said allegations.

11. Responding to Paragraph 11, Defendants deny said allegations.

RESPONDEAT SUPERIOR

12. Responding to Paragraph 12, Defendants deny said allegations.

RATIFICATION, ADOPTION AND AUTHORIZATION

13. Responding to Paragraph 13, Defendants deny said allegations.

14. Responding to Paragraph 14, to the extend that this paragraph contains legal contentions, no response from Defendant is required.

15. Responding to Paragraph 15, to the extend that this paragraph contains legal contentions, no response from Defendant is required.

16. Responding to Paragraph 16, Defendants deny said allegations.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

17. Responding to Paragraph 17, Defendants admit said allegations.

WORKERS' COMPENSATION EXCLUSIVITY DOES NOT APPLY

18. Responding to Paragraph 18, Defendants admit said allegations.

STATEMENT OF FACTS

19. Responding to Paragraph 19, Defendants admit the sentence as follows: "OFFICER STINGLEY was employed as a police officer with the HANFORD POLICE DEPARTMENT between the years of 2006 and 2021." Defendants deny the remaining allegations.

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20. Responding to Paragraph 20, Defendants deny said allegations.

21. Responding to Paragraph 21, Defendants deny said allegations.

22. Responding to Paragraph 22, Defendants are without sufficient information to admit or deny the allegations contained therein, and on this basis denies said allegations.

23. Responding to Paragraph 23, Defendants are without sufficient information to admit or deny the allegations contained therein, and on this basis denies said allegations.

24. Responding to Paragraph 24, Defendants are without sufficient information to admit or deny the allegations contained therein, and on this basis denies said allegations.

25. Responding to Paragraph 25, Defendants deny said allegations.

26. Responding to Paragraph 26, Defendants deny said allegations.

27. Responding to Paragraph 27, Defendants deny said allegations.

28. Responding to Paragraph 28, Defendants deny said allegations.

29. Responding to Paragraph 29, Defendants deny said allegations.

30. Responding to Paragraph 30, Defendants are without sufficient information to admit or deny the allegations contained therein, and on this basis denies said allegations.

31. Responding to Paragraph 31, Defendants are without sufficient information to admit or deny the allegations contained therein, and on this basis denies said allegations.

32. Responding to Paragraph 32, Defendants admit to the extent that findings of the Internal Investigation were affirmed. Defendants deny the remaining allegations.

33. Responding to Paragraph 33, Defendants admit that there was an investigation. Defendants deny the remaining allegations.

34. Responding to Paragraph 34, Defendants deny said allegations.

35. Responding to Paragraph 35, Defendants are without sufficient information to admit or deny the allegations contained therein, and on this basis denies said allegations.

36. Responding to Paragraph 36, Defendants deny said allegations.

37. Responding to Paragraph 37, Defendants deny said allegations.

FIRST CAUSE OF ACTION

38. Defendants incorporates by reference each admission, denial, and allegation set

1 forth in the foregoing paragraphs.

2 39. Responding to Paragraph 39, to the extend that this paragraph contains legal
3 contentions, no response from Defendant is required.

4 40. Responding to Paragraph 40, to the extend that this paragraph contains legal
5 contentions, no response from Defendant is required.

6 41. Responding to Paragraph 41, Defendants deny said allegations.

7 42. Responding to Paragraph 42, Defendants deny said allegations.

8 43. Responding to Paragraph 43, Defendants deny said allegations.

9 **SECOND CAUSE OF ACTION**

10 44. Defendants incorporates by reference each admission, denial, and allegation set
11 forth in the foregoing paragraphs.

12 45. Responding to Paragraph 45, to the extend that this paragraph contains legal
13 contentions, no response from Defendant is required.

14 46. Responding to Paragraph 46, Defendants are without sufficient information to
15 admit or deny the allegations contained therein, and on this basis denies said allegations.

16 47. Responding to Paragraph 47, to the extend that this paragraph contains legal
17 contentions, no response from Defendant is required.

18 48. Responding to Paragraph 48, Defendants deny said allegations.

19 49. Responding to Paragraph 49, Defendants deny said allegations.

20 50. Responding to Paragraph 50, Defendants deny said allegations.

21 51. Responding to Paragraph 51, Defendants deny said allegations.

22 52. Responding to Paragraph 52, Defendants deny said allegations.

23 53. Responding to Paragraph 53, Defendants deny said allegations.

24 **THIRD CAUSE OF ACTION**

25 54. Defendants incorporates by reference each admission, denial, and allegation set
26 forth in the foregoing paragraphs.

27 55. Responding to Paragraph 55, to the extend that this paragraph contains legal
28 contentions, no response from Defendant is required.

1 56. Responding to Paragraph 56, Defendants deny said allegations.
2 57. Responding to Paragraph 57, Defendants deny said allegations.
3 58. Responding to Paragraph 58, Defendants deny said allegations.
4 59. Responding to Paragraph 59, to the extend that this paragraph contains legal
5 contentions, no response from Defendant is required.

6 60. Responding to Paragraph 60, Defendants deny said allegations.
7 61. Responding to Paragraph 61, Defendants deny said allegations.
8 62. Responding to Paragraph 62, Defendants deny said allegations.

9 **FOURTH CAUSE OF ACTION**

10 63. Defendants incorporates by reference each admission, denial, and allegation set
11 forth in the foregoing paragraphs.

12 64. Responding to Paragraph 64, Defendants deny said allegations.
13 65. Responding to Paragraph 65, Defendants deny said allegations.
14 66. Responding to Paragraph 66, Defendants deny said allegations.

15 **FIFTH CAUSE OF ACTION**

16 67. Defendants incorporates by reference each admission, denial, and allegation set
17 forth in the foregoing paragraphs.

18 68. Responding to Paragraph 68, to the extend that this paragraph contains legal
19 contentions, no response from Defendant is required.

20 69. Responding to Paragraph 69, Defendants deny said allegations.
21 70. Responding to Paragraph 70, Defendants deny said allegations.

22 **SIXTH CAUSE OF ACTION**

23 71. Defendants incorporates by reference each admission, denial, and allegation set
24 forth in the foregoing paragraphs.

25 72. Responding to Paragraph 72, to the extend that this paragraph contains legal
26 contentions, no response from Defendant is required.

27 73. Responding to Paragraph 73, to the extend that this paragraph contains legal
28 contentions, no response from Defendant is required.

1 74. Responding to Paragraph 74, Defendants deny said allegations.

2 75. Responding to Paragraph 75, Defendants deny said allegations.

3 76. Responding to Paragraph 76, Defendants deny said allegations.

4 **SEVENTH CAUSE OF ACTION**

5 77. Defendants incorporates by reference each admission, denial, and allegation set
6 forth in the foregoing paragraphs.

7 78. Responding to Paragraph 78, to the extend that this paragraph contains legal
8 contentions, no response from Defendant is required.

9 79. Responding to Paragraph 79, Defendants are without sufficient information to
10 admit or deny the allegations contained therein, and on this basis denies said allegations.

11 80. Responding to Paragraph 80, Defendants deny said allegations.

12 81. Responding to Paragraph 81, Defendants deny said allegations.

13 82. Responding to Paragraph 82, Defendants deny said allegations.

14 **STATE CLAIMS**

15 **EIGHTH CAUSE OF ACTION**

16 83. Defendants incorporates by reference each admission, denial, and allegation set
17 forth in the foregoing paragraphs.

18 84. Responding to Paragraph 84, to the extend that this paragraph contains legal
19 contentions, no response from Defendant is required.

20 85. Responding to Paragraph 85, Defendants admit said allegations.

21 86. Responding to Paragraph 86, Defendants deny said allegations.

22 87. Responding to Paragraph 87, Defendants are without sufficient information to
23 admit or deny the allegations contained therein, and on this basis denies said allegations.

24 88. Responding to Paragraph 88, Defendants deny said allegations.

25 89. Responding to Paragraph 89, Defendants deny said allegations.

26 90. Responding to Paragraph 90, Defendants deny said allegations.

27 **NINTH CAUSE OF ACTION**

28 91. Defendants incorporates by reference each admission, denial, and allegation set

1 forth in the foregoing paragraphs.

2 92. Responding to Paragraph 92, to the extend that this paragraph contains legal
3 contentions, no response from Defendant is required.

4 93. Responding to Paragraph 93, Defendants admit said allegations.

5 94. Responding to Paragraph 94, Defendants deny said allegations.

6 95. Responding to Paragraph 95, Defendants deny said allegations.

7 96. Responding to Paragraph 96, Defendants deny said allegations.

8 97. Responding to Paragraph 97, Defendants deny said allegations.

9 **TENTH CAUSE OF ACTION**

10 98. Defendants incorporates by reference each admission, denial, and allegation set
11 forth in the foregoing paragraphs.

12 99. Responding to Paragraph 99, to the extend that this paragraph contains legal
13 contentions, no response from Defendant is required.

14 100. Responding to Paragraph 100, to the extend that this paragraph contains legal
15 contentions, no response from Defendant is required.

16 101. Responding to Paragraph 101, to the extend that this paragraph contains legal
17 contentions, no response from Defendant is required.

18 102. Responding to Paragraph 102, Defendants admit said allegations.

19 103. Responding to Paragraph 103, Defendants admit said allegations.

20 104. Responding to Paragraph 104, Defendants deny said allegations.

21 105. Responding to Paragraph 105, Defendants deny said allegations.

22 106. Responding to Paragraph 106, Defendants deny said allegations.

23 107. Responding to Paragraph 107, Defendants deny said allegations.

24 108. Responding to Paragraph 108, Defendants deny said allegations.

25 **ELEVENTH CAUSE OF ACTION**

26 109. Defendants incorporates by reference each admission, denial, and allegation set
27 forth in the foregoing paragraphs.

28 110. Responding to Paragraph 110, Defendants admit said allegations.

1 111. Responding to Paragraph 111, Defendants are without sufficient information to
2 admit or deny the allegations contained therein, and on this basis denies said allegations.

3 112. Responding to Paragraph 112, Defendants deny said allegations.

4 113. Responding to Paragraph 113, Defendants deny said allegations.

5 114. Responding to Paragraph 114, Defendants deny said allegations.

6 115. Responding to Paragraph 115, Defendants deny said allegations.

7 116. Responding to Paragraph 116, Defendants deny said allegations.

8 **TWELFTH CAUSE OF ACTION**

9 117. Defendants incorporates by reference each admission, denial, and allegation set
10 forth in the foregoing paragraphs.

11 118. Responding to Paragraph 118, to the extend that this paragraph contains legal
12 contentions, no response from Defendant is required.

13 119. Responding to Paragraph 119, to the extend that this paragraph contains legal
14 contentions, no response from Defendant is required.

15 120. Responding to Paragraph 120, Defendants deny said allegations.

16 121. Responding to Paragraph 121, Defendants deny said allegations.

17 **THIRTEENTH CAUSE OF ACTION**

18 122. Defendants incorporates by reference each admission, denial, and allegation set
19 forth in the foregoing paragraphs.

20 123. Responding to Paragraph 123, to the extend that this paragraph contains legal
21 contentions, no response from Defendant is required.

22 124. Responding to Paragraph 124, Defendants deny said allegations.

23 125. Responding to Paragraph 125, Defendants deny said allegations.

24 126. Responding to Paragraph 126, Defendants are without sufficient information to
25 admit or deny the allegations contained therein, and on this basis denies said allegations.

26 127. Responding to Paragraph 127, Defendants deny said allegations.

27 128. Responding to Paragraph 128, Defendants deny said allegations.

28 129. Responding to Paragraph 129, Defendants deny said allegations.

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130. Responding to Paragraph 130, Defendants deny said allegations.

131. Responding to Paragraph 131, Defendants deny said allegations.

132. Responding to Paragraph 132, Defendants deny said allegations.

FOURTEENTH CAUSE OF ACTION

133. Defendants incorporates by reference each admission, denial, and allegation set forth in the foregoing paragraphs.

134. Responding to Paragraph 134, Defendants deny said allegations.

135. Responding to Paragraph 135, Defendants deny said allegations.

PRAYER

WHEREFORE, Defendants request judgment as follows:

1. That Plaintiff takes nothing and is awarded no relief by reason of the Second Amended Complaint;
2. That the Court dismiss the Second Amended Complaint in its entirety with prejudice;
3. That Defendants be awarded its costs of suit, including its attorneys' fees to the extent permitted by law or contract; and
4. For such other and further relief as the Court may deem just and proper.

Dated: July 18, 2023

GRISWOLD, LaSALLE, COBB,
DOWD & GIN, L.L.P.

By: /s/ Christina G. Di Filippo
CHRISTINA G. Di FILIPPO
Attorneys for: Defendants, City of Hanford,
Hanford Police Department, Parker Sever,
Jeff Davis, Stephanie Huddleston

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2023, a copy of the foregoing was electronically filed using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record who are deemed to have consented to electronic service:

Charles A. Bonner, cbonner799@aol.com *Attorneys for Plaintiffs*
A. Cabral Bonner, cabral@bonnerlaw.com
Law Offices of Bonner & Bonner

By: /s/ Sarah Valencia
SARAH VALENCIA

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