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Attorney for Defendants, County of Los Angeles
Deputy John Roth and Deputy Wyatt Waldron

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ANA PATRICIA FERNANDEZ,)	CASE NO. 2:20-cv-9876-DMG-PDx
)	
Plaintiff,)	DECLARATION OF AMBER A.
)	LOGAN IN SUPPORT OF
vs.)	DEFENDANTS' MOTION FOR
)	SUMMARY JUDGMENT
LOS ANGELES COUNTY; et al.,)	
)	Date: May 10, 2024
Defendants.)	Time: 2:00 p.m.
)	Place: Courtroom 8C
)	Judge: Hon. Dolly M. Gee
)	

DECLARATION OF AMBER A. LOGAN

I, Amber A. Logan, state and declare the following:

- I am an attorney licensed to practice before all courts of the State of California, the United States District Court for the Central District of California, and the Court of Appeals for the Ninth Circuit. I am a Partner at

1 Logan Mathevosian & Hur LLP, attorneys of record herein for Defendants
2 County of Los Angeles, Los Angeles County Sheriff Deputies John Roth
3 and Wyatt Waldron. If called and sworn as a witness to testify, I am
4 competent to testify and would testify from my own personal knowledge as
5 to the facts set forth in this declaration, except as to those matters that are
6 stated on information and belief.
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9 2. This declaration is made in support of Defendants' motion for summary
10 judgment, or partial summary judgment, in this action.
- 11
12 3. Attached as Exhibit 1 and incorporated by reference herein is a true and
13 correct copy of Plaintiff's First Amended Complaint.
- 14
15 4. Attached as Exhibit 2 and incorporated by reference herein is a true and
16 correct condensed copy of the transcript of Plaintiff Ana Patricia
17 Fernandez's deposition taken in this action on September 12, 2023.
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19 5. Attached as Exhibit 3 and incorporated by reference herein is a true and
20 correct condensed copy of the transcript of Defendant Wyatt Waldron's
21 deposition taken in this action on September 28, 2023.
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23 6. Attached as Exhibit 4 and incorporated by reference herein is a true and
24 correct copy of the Search Warrant and Affidavit for Caprock Lane dated
25 June 13, 2018, as authenticated in the Deposition of Wyatt Waldron.
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- 1 7. Attached as Exhibit 5 and incorporated by reference herein is a true and
2 correct copy of photos of the June 14, 2018 search of the Caprock Lane, as
3 authenticated in the Deposition of Wyatt Waldron.
- 4 8. Attached as Exhibit 6 and incorporated by reference herein is a true and
5 correct copy of the Search Warrant and Affidavit for Sweetwater dated June
6 14, 2018, as authenticated in the Deposition of Wyatt Waldron.
- 7 9. Attached as Exhibit 7 and incorporated by reference herein is a true and
8 correct copy of the declaration of Defendant Wyatt Waldron executed March
9 1, 2024.
- 10 10. Attached as Exhibit 8 and incorporated by reference herein is a true and
11 correct copy of the Incident Report for Caprock dated June 14, 2018, as
12 authenticated in the Declaration of Wyatt Waldron.
- 13 11. Attached as Exhibit 9 and incorporated by reference herein is a true and
14 correct copy of the Incident Report for Sweetwater dated June 14, 2018, as
15 authenticated in the Declaration of Wyatt Waldron.
- 16 12. Attached as Exhibit 10 and incorporated by reference herein is a true and
17 correct copy of the Defendant John Roth's declaration executed February 29,
18 2024.
- 19 13. Attached as Exhibit 11 and incorporated by reference herein is a true and
20 correct condensed copy of the transcript of Defendant John Roth's
21 deposition taken in this action on September 27, 2023.

1 14. Attached as Exhibit 12 and incorporated by reference herein is a true and
2 correct copy of the Search Warrant and Affidavit for Caprock Lane dated
3 June 15, 2018, as authenticated in the Deposition of John Roth.

4 15. Attached as Exhibit 13 and incorporated by reference herein is a true and
5 correct copy of the Incident Report for Caprock dated June 20, 2018, as
6 authenticated in the Deposition of John Roth.

7 16. Attached as Exhibit 14 and incorporated by reference herein is a true and
8 correct copy of the Declaration of Susan Brown executed February 27, 2024,
9 attaching Exhibits 14 A – F.

10 17. Attached as Exhibit 14 A and incorporated by reference herein is a true and
11 correct copy of the photograph of firearms seized from the Fernandez
12 residence as authenticated by the Declaration of Susan Brown.

13 18. Attached as Exhibit 14 B and incorporated by reference herein is a true and
14 correct copy of the Los Angeles County Sheriff's Department Chain of
15 Custody Report (PRELIMS) as authenticated by the Declaration of Susan
16 Brown.

17 19. Attached as Exhibit 14 C and incorporated by reference herein is a true and
18 correct copy of Susan Brown's June 2018-emails as authenticated by the
19 Declaration of Susan Brown.

1 20. Attached as Exhibit 14 D and incorporated by reference herein is a true and
2 correct copy of the LASD Firearm Entry Forms for the Fernandez firearms
3 as authenticated by the Declaration of Susan Brown.

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5 21. Attached as Exhibit 14 E and incorporated by reference herein is a true and
6 correct copy of the Evidence Transfer Receipts of December 2019, as
7 authenticated by the Declaration of Susan Brown.

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9 22. Attached as Exhibit 14 F and incorporated by reference herein is a true and
10 correct copy of Susan Brown's December 19, 2019-email regarding the
11 release of the Fernandez firearms as authenticated by the Declaration of
12 Susan Brown.

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14 23. Attached as Exhibit 15 and incorporated by reference herein is a true and
15 correct copy of the Declaration of Cris Argonza, Los Angeles County
16 Sheriff's Department Evidence & Property Custodian executed February 22,
17 2024.

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19 24. Attached as Exhibit 16 and incorporated by reference herein is a true and
20 correct copy of the Declaration of Catherine L. Navetta, Los Angeles County
21 Sheriff's Department Supervising Criminalist executed February 29, 2024
22 attaching Exhibits 16 A, B and C.

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24 25. Attached as Exhibit 16 A and incorporated by reference herein is a true and
25 correct copy of the LASD Scientific Services Firearm Manual 4.1 Firearm
26 Examinations as authenticated by the Declaration of Catherine L. Navetta,
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1 Los Angeles County Sheriff's Department Supervising Criminalist executed
2 February 29, 2024.

3 26. Attached as Exhibit 16 B and incorporated by reference herein is a true and
4 correct copy of the LASD Scientific Services Firearm Manual 4.3 NIBIN
5 Methods and Procedures as authenticated by the Declaration of Catherine L.
6 Navetta, Los Angeles County Sheriff's Department Supervising Criminalist
7 executed February 29, 2024.
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10 27. Attached as Exhibit 16 C and incorporated by reference herein is a true and
11 correct copy of the NIBIN Log for the Fernandez firearms as authenticated
12 by the Declaration of Catherine L. Navetta, Los Angeles County Sheriff's
13 Department Supervising Criminalist executed February 29, 2024.
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15 28. Attached as Exhibit 17 and incorporated by reference herein is a true and
16 correct copy of the Declaration of Anel Frederick, Los Angeles County
17 Sheriff's Department Administrative Services Manager, II, dated February
18 29, 2024, attaching Exhibit 17 A.
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20 29. Attached as Exhibit 17 A is the relevant wage and hour information for
21 LASD employees in June 2018 and December 2019 as authenticated by the
22 Declaration of Anel Frederick, Los Angeles County Sheriff's Department
23 Administrative Services Manager, II, dated February 29, 2024.
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1 30. Lodged concurrently with the filing of this declaration as Exhibit 18 is a true
2 and correct copy of the pre-search video footage of Caprock Lane search on
3 June 14, 2018, as authenticated by the Declaration of Wyatt Waldron.

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5 31. Lodged concurrently with the filing of this declaration as Exhibit 19 is a true
6 and correct copy of the pre-search video footage of the Sweetwater search
7 on June 14, 2018, as authenticated by the Declaration of Wyatt Waldron.

8 I declare under the penalty of perjury under the laws of the State of California
9
10 that the foregoing is true and correct.

11 Executed this 22nd day of March 2024 at Los Angeles, California.

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13 s / Amber A. Logan

14 AMBER A. LOGAN
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Exhibit No.	Description of Evidence	Bates Nos.
1	Plaintiff's First Amended Complaint	0001-0028
2	Plaintiff Ana Patricia Fernandez's deposition transcript	0029-0044
3	Defendant Wyatt Waldron's deposition transcript	0045-0078
4	Search Warrant and Affidavit for Caprock dated June 13, 2018 (Waldron Depo. Ex. 5)	0079-0085
5	Photos of Caprock Lane search June 14, 2018 (Waldron Depo. Ex. 6)	0086-0095
6	Search Warrant and Affidavit for Sweetwater dated June 14, 2018 (Waldron Depo. Ex. 7)	0096-0101
7	Defendant Wyat Waldron's Declaration	0102-0104
8	Incident Report for Caprock dated June 14, 2018	0105-0118
9	Incident Report for Sweetwater dated June 14, 2018	0119-0131
10	Defendant John Roth's Declaration	0132-0133
11	Defendant John Roth's deposition transcript	0134-0169
12	Search Warrant and Affidavit for Caprock dated June 15, 2018	0170-0172
13	Incident Report for Caprock dated June 20, 2018	0173-0174
14	Declaration of Susan Brown (attaching Exhibits A, B, C, D, E, and F)	0174-0183
14 A	Photograph of Firearms	0184-0185
14 B	Los Angeles County Sheriff's Department PRELIMS Chain of Custody Report	0186-0452
14 C	Susan O'Leary Brown E-Mails	0453-0470
14 D	Firearm Entry Forms	0471-4597

1	14 E	Evidence Transfer Receipts	4598-5577
2	14 F	December 19, 2019-email from Susan M. Oleary-Brown regarding the release of firearms.	5578-5579
3	15	Declaration of Cris Argonza, Los Angeles County Sheriff's Department Evidence & Property Custodian	5580-5584
4	16	Declaration of Catherine L. Navetta, Los Angeles County Sheriff's Department Supervising Criminalist (attaching Exhibits A, B, and C)	5585-5587
5	16 A	LASD Scientific Services Firearm Manual 4.1 Firearm Examination	5588-5604
6	16 B	LASD Scientific Services Firearm Manual 4.3 NIBIN Methods and Procedures	5605-5608
7	16 C	NIBIN Log for Fernandez Firearms	5609-5612
8	17	Declaration of Anel Frederick, Los Angeles County Sheriff's Department Administrative Services Manager, II (attaching Exhibit A)	5613-5614
9	17 A	LASD Wage and Hour Information	5615-5617
10	18	Pre-search video footage of Caprock Lane	5618
11	19	Pre-search video footage of Sweetwater	5619