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8 Counsel for MAYOR EDWIN M. LEE

9  
 10 ETHICS COMMISSION  
 11 CITY AND COUNTY OF SAN FRANCISCO

12  
 13 In the Matter of Charges Against  
 14 ROSS MIRKARIMI,  
 15 Sheriff, City and County of San Francisco.

**MAYOR’S EVIDENTIARY  
 OBJECTIONS TO DECLARATION OF  
 ELIANA LOPEZ & REQUEST FOR  
 CROSS-EXAMINATION**

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 20 The Mayor hereby requests cross-examination of Eliana Lopez.

21 Objections:

Testimony	Objection
Paragraph 5, p. 1:22-2:3 (“I believed ... were privileged.”)	Relevance; legal conclusion.
Paragraph 6 (entire paragraph)	Relevance; waste of time. As to last sentence (“Ivory advertises...social networking sites.”): relevance; waste of time; foundation.

Testimony	Objection
Paragraph 7, p. 2:10-11 (“Ivory dispensed legal advice to me.”)	Relevance; legal conclusion; waste of time.
Paragraph 10 (entire paragraph)	Relevance; argumentative; hearsay; waste of time.
Paragraph 12, p. 12:7-19 (“Ivory told me... ‘Screw him!’”)	Relevance; argumentative; hearsay; waste of time.
Paragraph 13, p. 3:22-23 (“because this had never happened before”)	Hearsay.
Paragraph 13, p. 3:23-24 (“Ross does not drink...right woman for him.”)	Relevance; argumentative.
Paragraph 13, p. 3:25 (“Ivory ignored me.”); 3:28-4:1 (“Ivory did not listen to me.”); 4:1-2 (“That was the only statement that stopped her”).	Lacks foundation; argumentative.
Paragraph 13, p. 3:25-26 (“as my attorney”).	Relevance; legal conclusion.
Paragraph 14, p. 4:11-13 (“Perhaps Callie misunderstood...about custody.”)	Foundation.
Paragraph 15, p. 4:14-17 (“Callie Williams declared in her Declaration...December 31, 2011.”); p. 4:18-23 (“Finally, contrary to...Callie.”)	Argumentative.
Paragraph 16, p. 4:25-5:1 (“I believed, and still believe, that Ross ... change and development.”)	Relevance; argumentative; foundation.
Paragraph 17 (entire paragraph)	Relevance; argumentative.
Paragraph 19, p. 5:12-13 (“Ms. Haynes is a domestic violence counselor”)	Foundation.
Paragraph 21, p. 5:20-21 (“as that is the way the law is in Venezuela”)	Foundation; legal conclusion.
Paragraph 24, p. 6:1-3 (“Ross was not ever involved...control the dissemination of the video.”)	Foundation.

Testimony	Objection
Paragraph 25 (entire paragraph) & Exhibits 1-4	Relevance; argumentative; foundation; legal conclusion; waste of time.
Paragraph 26 (entire paragraph)	Relevance; argumentative; unfairly prejudicial.
Paragraph 28, p. 6:25-28 (“However, Ross has consistently tried...demonstrates his growth.”)	Relevance, argumentative, foundation.

DATED: July 10, 2012

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