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FILED
SAN MATEO COUNTY
OCT 09 2019

Clerk of the Superior Court
By M. P. [Signature]
DEPUTY CLERK

5 Attorneys for Petitioner
COUNTY OF SAN MATEO SHERIFF CARLOS
6 BOLANOS

7 *Exempt from Filing Fees per Government Code § 6103*

8
9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF SAN MATEO

11 COUNTY OF SAN MATEO SHERIFF
12 CARLOS BOLANOS,

13 Petitioner,

14 vs.

15 DOUGLAS LLOYD RAINSFORD,

16 Respondent.

Case No. **19CV05964**

**DECLARATION OF DAVID A. SILBERMAN IN
SUPPORT OF PETITION RE CONFISCATED
FIREARMS AND AMMUNITION AND MOTION
TO FILE UNDER SEAL**

[Welf. & Inst. Code § 8102]

17
18 I, DAVID A. SILBERMAN, declare as follows:

19 1. I am a Chief Deputy County Counsel for the County of San Mateo. I am assigned to
20 provide ongoing advice and legal assistance to the San Mateo County Sheriff's Office. The following is
21 within my personal knowledge and, if called as a witness, I could and would testify competently hereto.

22 2. A true and correct copy of a report regarding the incident that occurred on September 29,
23 2019 authored by Officer Michael Grogan (BADGE #25022) is attached hereto as Exhibit A.

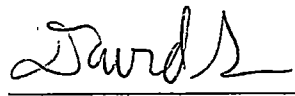
24 3. Reports like Exhibit A are routinely created by deputies and maintained by the Sheriff's
25 Office in the course and scope of Sheriff's Office operations. It is generally expected that the information
26 contained in such reports be memorialized at or near the time that the information is obtained.

27 4. Petitioner is moving to have Exhibit A filed under seal because it contains private and
28 personal information related to placement of Respondent on a hold pursuant to § 5150 of the Welfare &

1 Institutions Code. Other than asserting whatever privacy rights to the information that Respondent may
2 have, Petitioner has no interest in the confidentiality of the documents and asks that, in the event the
3 Court concludes that sealing is not appropriate, that Exhibit A be filed in the public Court file.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
5 and correct. Executed this 9th day of October, 2019 at Redwood City, California.

6
7 JOHN C. BEIERS, COUNTY COUNSEL

8
9 By: 
10 DAVID A. SILBERMAN