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CLERK OF THE SUPERIOR COURT  
COUNTY OF STANISLAUS

*Adriana*  
DEPUTY

10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF STANISLAUS

12 THE PEOPLE OF THE STATE OF CALIFORNIA,  
13 Plaintiff,

14 vs.

15 FRANK CLIFFORD CARSON,  
16 BALJIT ATWAL,  
17 DALJIT ATWAL,  
18 WALTER WESTLEY WELLS,  
19 GEORGIA DEFILIPPO,  
20 **CHRISTINA DEFILIPPO,**  
21 EDUARDO QUINTANAR AND  
22 SCOTT MCFARLANE,  
23 Defendants.

CASE NO.: 1490969

**REQUEST FOR PERMISSION TO  
EXCEED 15 PAGE LIMIT TO  
RESPOND TO DEFENDANTS'  
SUPPLEMENTAL AND  
ONGOING MOTIONS TO  
DISMISS RE: OUTRAGEOUS  
PROSECUTORIAL  
MISCONDUCT;  
SUPPLEMENTAL BRIEF POLICE  
MISCONDUCT; INTERFERENCE  
WITH RIGHT TO COUNSEL**

Date: May 10, 2016

Time: 9:30 a.m.

Dept. 26

The Honorable Barbara Zuñiga

24 Comes now the People of the State of California, by and through their attorney, BIRGIT  
25 FLADAGER, Stanislaus County District Attorney, MARLISA A. FERREIRA, Chief Deputy  
26 District Attorney, and respectfully requests permission to file a response, in excess of 15 pages, to  
27 defendants' supplemental and ongoing motions to dismiss re: outrageous prosecutorial misconduct,  
28 supplemental brief police misconduct, and interference with right to counsel.

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LAW AND ARGUMENT

I.

**THE PEOPLE REQUEST TO EXCEED 15 PAGES TO RESPOND TO  
DEFENDANTS' MOTION**

Stanislaus County Superior Court Local Rules, Rule 4.04(B) provides,

A memorandum of points and authorities shall not exceed **fifteen (15)** pages, excluding exhibits, declarations or attachments. Any party may request by written notice to the court scheduled to hear the motion, a request to exceed the **fifteen (15)** page limitation **two (2)** days before the motion is to be filed or response due. Such written request set forth good cause why the **fifteen (15)** page limit needs to be exceeded.

Defendants' motion raises a total of 20 claims of "alleged" misconduct within a 44-page motion. To adequately respond to defendant's lengthy motion, the People respectfully request the Court grant the People permission to exceed the 15 page limit.

Dated this 10th day of March 2016, at Modesto, California.

Respectfully submitted,

BIRGIT FLADAGER  
District Attorney



Marlisa A. Ferreira  
Chief Deputy District Attorney

MAF:BC/vav

**PROOF OF SERVICE BY ELECTRONIC MAIL**

STATE OF CALIFORNIA            )  
COUNTY OF STANISLAUS        )

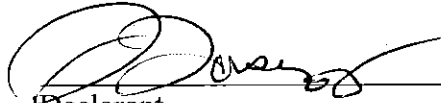
I, the undersigned, declare as follows:

That I am over the age of 18 years and am not a party to this action and I am employed by the Stanislaus County District Attorney's Office, 832 12th Street, Suite 300, Modesto, California.

That I served a copy of the **PEOPLE'S REQUEST FOR PERMISSION TO EXCEED 15 PAGE LIMIT TO RESPOND TO DEFENDANTS' SUPPLEMENTAL AND ONGOING MOTIONS TO DISMISS RE: OUTRAGEOUS PROSECUTORIAL MISCONDUCT; SUPPLEMENTAL BRIEF POLICE MISCONDUCT; INTERFERENCE WITH RIGHT TO COUNSEL** on March 11, 2016 pursuant to California Code of Civil Procedure section 1010.6(a)(6) by electronically sending a copy thereof to the offices of Jesse Garcia at [JesseJGARCIA@aol.com](mailto:JesseJGARCIA@aol.com), Timothy Rien at [rienlaw@sbcglobal.net](mailto:rienlaw@sbcglobal.net), Martha Carlton-Magana at [carltnm@hotmail.com](mailto:carltnm@hotmail.com), Preciliano Martinez at [attymartinezp@yahoo.com](mailto:attymartinezp@yahoo.com), Hans Hjertonsson at [Hans.hjertonsson@gmail.com](mailto:Hans.hjertonsson@gmail.com), Alonzo Gradford at [gradfordlaw@gmail.com](mailto:gradfordlaw@gmail.com), Lawrence Niermeyer at [lniermeyer@aol.com](mailto:lniermeyer@aol.com), Robert Lee Forkner at [RLFCrimLaw@aol.com](mailto:RLFCrimLaw@aol.com), Bruce Perry at [brucerperry@msn.com](mailto:brucerperry@msn.com) and Stephanie Mitchell at [stephanie.mitchell@stanct.org](mailto:stephanie.mitchell@stanct.org).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of March 2016, at Modesto, California.

  
\_\_\_\_\_  
Declarant

Case No. 1490969  
People v. Carson et al.  
Dept. 26