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FILED

15 AUG 19 AM 10:37

CLERK OF THE SUPERIOR COURT
COUNTY OF STANISLAUS

BY  DEPUTY

1 PRECILIANO MARTINEZ
2 ATTORNEY AT LAW
3 State Bar No. 93253
4 1120 14th St, Suite 5
5 Modesto, CA 95354
6 (209)579-2206/ (209)579-2211 Fax

7 Attorney for Defendant
8 FRANK C. CARSON

9
10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF STANISLAUS

12 PEOPLE OF THE STATE OF CALIFORNIA,)

13 Plaintiff,)

14 vs.)

15 FRANK C. CARSON,)
16 Defendant.)

CASE NO. 1490969

NOTICE OF JOINDER TO JOIN GEORGIA
DIFILIPPO'S MOTION AND [PROPOSED]
ORDER LIMITING USE OF SHACKLES
AND DECLARATION OF FRANK C.
CARSON

DATE: 08/25/2015

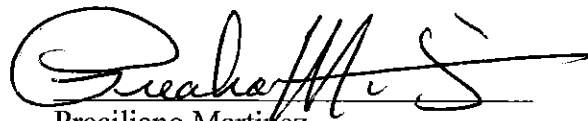
TIME: 9:00

DEPT.: TBA

17
18 TO BIRGIT FLADAGER, DISTRICT ATTORNEY, COUNTY OF STANISLAUS,
19 STATE OF CALIFORNIA AND HER REPRESENTATIVE:

20 Please take notice that defendant, FRANK C. CARSON, by and through his counsel,
21 PRECILIANO MARTINEZ, respectfully joins Georgia Difilippo's Motion and [Proposed]
22 Order Limiting Use of Shackles filed by co-counsel in this matter.

23 Respectfully Submitted,

24 

25 Preciliano Martinez
26 Attorney for Defendant,
27 FRANK C. CARSON

28 Dated: 08/19/15

AV

1 PRECILIANO MARTINEZ
2 ATTORNEY AT LAW
3 State Bar No. 93253
4 1120 14th St, Suite 5
5 Modesto, CA 95354
6 (209)579-2206/ (209)579-2211 Fax

7 ATTORNEY FOR DEFENDANT
8 FRANK C. CARSON

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF STANISLAUS

12 PEOPLE OF THE STATE OF
13 CALIFORNIA

14 Plaintiff,

15 vs.

16 FRANK C. CARSON,
17 Defendant.

18) CASE NO.

19) DECLARATION OF DEFENDANT FRANK
20) CARSON REGARDING SHACKLING

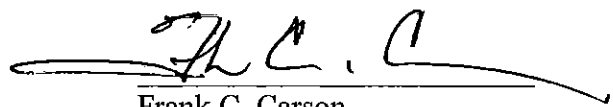
21
22 When visiting my attorney in custody I am being bound as follows: leg irons and
23 chains put on my ankles, a "belly" chain put around my waist, to which is attached a box and
24 handcuffs tightly clamped on my wrists. In the visiting room I am then chained behind my
25 back to a short metal stool. The handcuffs prevent my even turning a piece of paper and
26 writing is impossible. The cuffs cause great pain and cut into my wrists and have bruised
27 them. My hands swell up and go numb. After the visit my wrists hurt for hours. I am a large
28 man weighing approximately 265 pounds and have repeatedly asked for bigger cuffs which
has been ignored. I cannot sit up and discuss with my attorney my case. The least
uncomfortable position I can endure is to put my face down on the table and turn to face my
attorney. I find it necessary to cut short visits unless absolutely necessary to stop the pain and

1 discomfort that I cannot tolerate. I cannot effectively communicate with my attorney and
2 prepare my defense under these circumstances.

3
4 I am 61 years old, am diabetic, and have blood pressure issues. I am not a threat or
5 security risk. I have never before been arrested and have been a cooperative and compliant
6 prisoner. I have been an officer of the court for over 25 years.

7
8 I certify under penalty and perjury that the foregoing is true and correct.
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12 Date: *Aug 18, 2015*


13 Frank C. Carson

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PROOF OF SERVICE

I declare that I am over the age of eighteen (18), not a party to the above-referenced action, and my business address is 1120 Fourteenth Street, Suite 5, Modesto. California 95354.

On the date shown below, I

_____ deposited in the United States Mail, or

personally served the following:

**NOTICE OF JOINDER AND FRANK C. CARSON'S DECLARATION;
FRANK C. DECLARATION; CASE NO. 1490969**

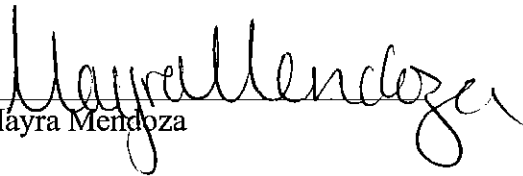
On the following parties:

STANISLAUS COUNTY SUPERIOR COURT
800 11th Street
Modesto, CA 95354

STANISLAUS COUNTY DISTRICT ATTORNEY
832 12th Street, Room 300
Modesto, CA 95354

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

Signed this 19TH of August, 2015, at Modesto, California.


Mayra Mendoza