

(ENDORSED)  
**FILED**  
SEP 12 2016

DAVID H. YAMASAKI  
Chief Executive Officer/Clerk  
Superior Court of California, County of Santa Clara  
*K. O'NEILL* DEPUTY

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,  
BROCK ALLEN TURNER,  
Defendant.

NO: B1577162

ORDER RE: REQUEST TO SEAL TRIAL EXHIBITS DEPICTING JANE DOE AND MEDICAL RECORDS TO PRESERVE ANONYMITY PURSUANT TO PENAL CODE SECTION 293.5 AND RIGHT TO PRIVACY

An ex parte application to seal certain trial exhibits in the above entitled case that involve the victim, Jane Doe, has been made by the prosecution. Counsel for the defense was consulted and has no objection to the sealing of the specified records. The Court after having considered the application, declaration of Deputy district Attorney Alaleh Kianerci, the memorandum of points and authorities in support of the application and the victim's request for anonymity, finds that pursuant to California Rule of Court 2.550 there is an overriding interest, i.e. the victim's right to privacy, that overcomes the public's interest in access to specific records that depict the victim face and other parts of her body as well as records that involve medical findings and records of the physical examination of the victim. This overriding interest supports sealing the specified records and there is a substantial probability

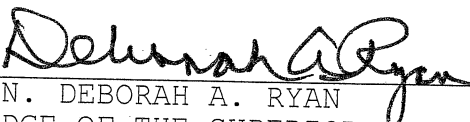
1 that the overriding interest will be prejudiced if these records are  
2 not sealed. The Court further finds that the proposed sealing of  
3 the specific records identified by the prosecution is narrowly  
4 tailored and there is no less restrictive means to achieve the  
5 overriding interest.

6 A victim has a right to privacy under Article 1, Section 1 of  
7 the California Constitution. Further, pursuant to Penal Code  
8 section 293.5, the victim of a sexual offense, such as the victim in  
9 the instant case, has the right to request to be referred to in  
10 court and in all records as Jane Doe so that her identity may be  
11 protected and her privacy honored. The victim in this case did  
12 request anonymity and the trial judge ordered that the victim's  
13 identity in court and in all records relating to her be in the name  
14 of Jane Doe to protect her privacy. Allowing the records specified  
15 below to remain unsealed would compromise the victim's identity and  
16 subject her to the unnecessary indignity of having her private body  
17 parts displayed and her medical records revealed.

18 According, the following trial exhibits are ordered sealed:  
19 10, 11, 12, 13, 14, 15, 16, 17, 38, 39, 40, 41, 42, 43, 44, 45, 46,  
20 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, and 62.

21 The Clerk's Office is to post notice of this ex parte  
22 application for sealing on the Court website by 5:00 p.m. on  
23 September 12, 2016.

24  
25 DATED: September 9, 2016

26   
27 HON. DEBORAH A. RYAN  
28 JUDGE OF THE SUPERIOR COURT



**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SANTA CLARA**

<p align="center">The People of the State of California, Plaintiff,</p> <p align="center">vs.</p> <p align="center">Brock Allen Turner Defendant,</p>	<p align="center"><b>(ENDORSED)</b> <b>F I L E D</b></p> <p align="center">SEP 12 2016</p>
<p align="center">PROOF OF SERVICE BY MAIL OF:</p>	<p align="center">DAVID H. YAMASAKI Chief Executive Officer/Clerk Superior Court of CA/County of Santa Clara BY <u>L. Ballesteros</u> DEPUTY</p>
<p align="center">ORDER RE: REQUEST TO SEAL TRIAL EXHIBITS DEPICTING JANE DOE AND MEDICAL RECORDS TO PRESERVE ANONYMITY PURSUANT TO PENAL CODE SECTION 293.5 AND RIGHT TO PRIVACY</p>	<p align="center">CASE NO.: B1577162</p>

CLERK'S CERTIFICATE OF SERVICE

I CERTIFY THAT I AM NOT A PARTY TO THIS CAUSE AND THAT A TRUE COPY OF THIS DOCUMENT, **ORDER RE: REQUEST TO SEAL TRIAL EXHIBITS DEPICTING JANE DOE AND MEDICAL RECORDS TO PRESERVE ANONYMITY PURSUANT TO PENAL CODE SECTION 293.5 AND RIGHT TO PRIVACY** WAS HAND-DELIVERED INTO THE BELOW-LISTED AGENCY'S INTER-OFFICE PICK-UP BOX, (WHERE APPLICABLE), OR MAILED WITH FIRST CLASS POSTAGE PREPAID IN A SEALED ENVELOPE ADDRESSED AS SHOWN BELOW, AND THESE DOCUMENTS WERE PLACED FOR PICK-UP OR MAILED AT SAN JOSE, CALIFORNIA ON DATE SHOWN BELOW.

DATED: **September 12, 2016**

DAVID YAMASAKI, CHIEF EXECUTIVE OFFICER/CLERK

BY: *LB*  
Ligaya Ballesteros, Deputy Courtroom Clerk

<p><b>Office of the District Attorney</b> <b>Attn: Alaleh Kianerci *</b></p>	<p>Michael Armstrong, Esq * 600 Allerton St., Suite 200 Redwood City, CA 94063</p>
<p>* via e-mail: <a href="mailto:AKianerci@da.sccgov.org">AKianerci@da.sccgov.org</a></p>	<p>* via e-mail: <a href="mailto:marmstrong@peninsulacrimlaw.com">marmstrong@peninsulacrimlaw.com</a></p>



SEP 08 2016

1                   **II.       MEMORANDUM OF AUTHORITIES**

2                   DAVID H. YAMASAKI  
3                   Chief Executive Officer/Clerk  
4                   Superior Court of California County of Santa Clara  
5                   BY L. Williams DEPUTY

6                   The state constitutional right of privacy is enshrined in article 1, section 1 of the  
7                   state Constitution. That section states: “All people are by nature free and independent and  
8                   have inalienable rights. Among these are enjoying and defending life and liberty,  
9                   acquiring, possessing, and protecting property, and pursuing and obtaining safety,  
10                  happiness, and **privacy**.” (Emphasis added.)

11                  California cases “establish that, in many contexts, the scope and application of the  
12                  state constitutional right of privacy is broader and more protective of privacy than the  
13                  federal constitutional right of privacy as interpreted by the federal courts.” (*American*  
14                  *Academy of Pediatrics v. Lungren* (1997) 16 Cal.4th 307, 336.) Since discovery requests by  
15                  parties to an action involve judicial orders compelling disclosure, they are treated as state  
16                  action. (See *Planned Parenthood Golden Gate v. Superior Court* (2000) 83 Cal.App.4th  
17                  347, 357.) But even if the defense request for the information is not viewed as state action,  
18                  the court would still have an obligation to protect the privacy interest of the person whose  
19                  records have been subpoenaed since the state constitutional right of privacy applies to  
20                  private, as well as to state, action. (See *Hill v. National Collegiate Athletic Assn.* (1994) 7  
21                  Cal.4th 1, 15-20.) Indeed, the 2004 legislation that amended Penal Code section 1326 to  
22                  allowed for in camera hearings on whether subpoenaed records may be disclosed to the  
23                  defense but not the prosecution was “designed to better protect the *privacy rights* of third-  
24                  party citizens and litigants alike when subpoenas are issued and served in criminal cases.”  
25                  (*Kling v. Superior Court* (2010) 50 Cal.4th 1068, 1076, emphasis added.)

Information is considered “private” under the state constitutional right of privacy  
“when well-established social norms recognize the need to maximize individual control  
over its dissemination and use to prevent unjustified embarrassment or indignity.”

1 (*International Federation of Professional and Technical Engineers, Local 21, AFL-CIO v.*  
2 *Superior Court* (2007) 42 Cal.4th 319, 330; *Hill v. National Collegiate Athletic Assn.*  
3 (1994) 7 Cal.4th 1, 30.) Among other information protected by the state constitutional  
4 right to privacy: arrest records (see *International Federation of Professional and*  
5 *Technical Engineers, Local 21, AFL-CIO v. Superior Court* (2007) 42 Cal.4th 319, 340;  
6 *People v. Jenkins* (2000) 22 Cal.4th 900, 957; *Reyes v. Municipal Court* (1981) 117  
7 Cal.App.3d 771, 775; *Craig v. Municipal Court* (1979) 100 Cal.App.3d 69, 72); records of  
8 personal financial affairs (see *City of Carmel-by-the-Sea v. Young* (1970) 2 Cal.3d 259,  
9 268); a patient's medical records and psychiatric history (see *Manela v. Superior Court*  
10 (2009) 177 Cal.App.4th 1139, 1150; *Pettus v. Cole* (1996) 49 Cal.App.4th 402, 440);  
11 personnel files (see *In re Clergy Cases I* (2010) 188 Cal.App.4th 1224, 1235); school  
12 records by virtue of Education Code section 49076 (see *BRV, Inc. v. Superior Court*  
13 (2006) 143 Cal.App.4th 742, 751-754); and information concerning a person's sexual  
14 conduct (see *Roman Catholic Bishop v. Superior Court* (1996) 42 Cal.App.4th 1556, 1567;  
15 *Barrenda L. v. Superior Court* (1998) 65 Cal.App.4th 794, 800). If the records contain  
16 information such as witness' social security number or other identifying information that,  
17 if made public, would make the witness vulnerable to identity theft, this should also be  
taken into account.

18 A court reviewing records pertaining to the victim of a crime that would disclose  
19 "confidential information or records to the defendant, the defendant's attorney, or any  
20 other person acting on behalf of the defendant, which could be used to locate or harass the  
21 victim or the victim's family or which disclose confidential communications made in the  
22 course of medical or counseling treatment, or which are otherwise privileged or  
23 confidential by law" must take into account the victim's state constitutional *right* not to  
24 have that information disclosed. (See Cal. Const., art. I, § 28 (b)(4) [enacted by Marsy's

1 Law]; see also (*Kling v. Superior Court* (2010) 50 Cal.4th 1068, 1080.)

2 While the privacy interest of a third party in the records subpoenaed by the defense  
3 is not absolute (see *Hill v. National Collegiate Athletic Assn.* (1994) 7 Cal.4th 1, 37),  
4 release of the records “must be justified by a compelling interest.” (*White v. Davis* (1975)  
5 13 Cal.3d 757, 775.) Before information subpoenaed by the defense can be disclosed, the  
6 judge must determine (i) if there is a protected privacy interest; (ii) whether there is a  
7 reasonable expectation of privacy in the circumstances; (iii) how serious is the invasion of  
8 privacy, and (iv) whether the invasion is outweighed by legitimate and competing  
9 interests. (*Hill v. National Collegiate Athletic Assn.* (1994) 7 Cal.4th 1, 39-40.) “The key  
10 element in this process is the weighing and balancing of the justification for the conduct in  
11 question against the intrusion on privacy resulting from the conduct whenever a genuine,  
12 nontrivial invasion of privacy is shown.” (*Alfaro v. Terhune* (2002) 98 Cal.App.4th 492,  
13 509.)

14 The United States Supreme Court has specifically identified the interest “in inhibiting  
15 disclosure of sensitive information” as an interest that can override the right to a public trial.  
16 (*Presley v. Georgia* (2010) 130 S.Ct. 721, 724; *Waller v. Georgia* (1984) 467 U.S. 39, 45.)  
17 “[B]efore substantive courtroom proceedings are closed or transcripts are ordered sealed, a trial  
18 court must hold a hearing and expressly find that (i) there exists an overriding interest  
19 supporting closure and/or sealing; (ii) there is a substantial probability that the interest will be  
20 prejudiced absent closure and/or sealing; (iii) the proposed closure and/or sealing is narrowly  
21 tailored to serve the overriding interest; and (iv) there is no less restrictive means of achieving  
22 the overriding interest.” (*Id.* at pp. 1217–1218, 86 Cal.Rptr.2d 778, 980 P.2d 337, original  
23 italics & fns. omitted.) These five requirements have been outlined in California Rule of Court  
24 2.550(d).

1 Rules 243.1 and 243.2 were adopted to comply with the Supreme Court's decision. Rule  
2 243.1 requires the express findings enumerated in *NBC Subsidiary* and also directs that they  
3 must be incorporated in the order sealing any part of a record. Rule 243.2 sets out the  
4 procedures to be followed in sealing or unsealing a record. *In re Providian Credit Card Cases*  
5 (2002) 96 Cal.App.4th 292, 297–98 [116 Cal.Rptr.2d 833, 837]

6 Pursuant to P.C. Section 293.5, Identity of Sex Offense Victim, the court, at the request  
7 of the victim, may order the identity of the victim in all records to be identified as Jane Doe.  
8 Additionally, a victim has a right of privacy that is protected by California law

9 In this matter, Jane Doe's right to privacy is an overriding interest which supports  
10 the sealing of the exhibits that include degrading photographs depicting her in a state of  
11 undress, photographs depicting her genitalia, and medical records outlining her sexual  
12 assault response exam. The People's proposed order is narrowly tailored to only those  
13 exhibits that directly relate to Jane Doe's right of privacy and dignity as those photographs  
14 depict her physical state and medical reports. This order is narrowly tailored as there are  
15 many other exhibits that will remain unsealed and are not affected by this order.  
16 Furthermore, as referenced below in the People's declaration, there have been attempts by  
17 members of the public to reveal the victim's true identity and there have been attempts by  
18 members of the media to contact the victim. Therefore, there is an interest in sealing the  
19 exhibits to further protect the victim's privacy and anonymity. Finally, there is no less  
20 restrictive means of protecting Jane Doe's privacy from repeated attempts to disclose her  
21 identity.

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**F** **(ENDORSED)** **FILED** **D**

SEP 08 2016

DAVID H. YAMASAKI  
Chief Executive Officer/Clerk  
Superior Court of CA County of Santa Clara  
BY *[Signature]* DEPUTY

1 **III. DECLARATION FROM THE PEOPLE**

2 I, Alaleh Kianerci, declare the following:

3 I am the prosecutor assigned to the above case.

4 During the trial photographs of the victim at the scene, in the hospital and during her  
5 SART exam were placed into evidence. Additionally, medical records pertaining to her medical  
6 treatment during the SART exam were placed into evidence. These exhibits specifically  
7 include: Exhibits 10-17, Exhibits 38-62. (See Attachment One for exhibit titles that are  
8 highlighted)

9 I have been in regular contact with the victim in the case from the inception of the  
10 charges, through trial, sentencing and post-sentencing. The victim personally expressed to me  
11 her strong desire to remain anonymous. The case has garnered intense media coverage and  
12 there have been several attempts to divulge the victim's identity since the sentencing hearing  
13 that was held on June 2, 2016. Honorable Judge Aaron Persky previously signed an order  
14 redacting any and all reference to the victim's name from her true identity to Jane Doe and her  
15 sister to Jane Doe II. Despite this order my office has encountered many attempts to post the  
16 victim's name and identity online by members of the public who wish to "out" her. Moreover,  
17 some members of the media have attempted to contact the victim through various direct and  
18 indirect means.

19 It has previously come to my attention that a court clerk inadvertently missed some of  
20 the redactions and references to the victim's name, and some documents in the court file made  
21 reference to the victim's true identity. These documents were accessed by members of the  
22 media and members of the public. This was previously brought to Court Information Officer  
23 Joe Macaluso's attention. It has recently come to my attention that there was yet another breach  
24 of the court protocol and an unidentified court clerk allowed access of the court exhibits to



1 members of the media, namely an NBC news organization, and they were able to improperly  
2 take video and photographs of courts exhibits without any media request or authorization from  
3 the court. These exhibits include graphic photos of the victim at the scene and at the hospital  
4 during her sexual assault medical exam. The exhibits also include her medical records, i.e.  
5 SART exam report.

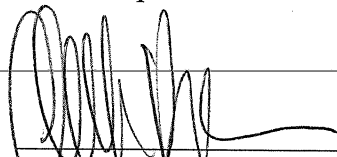
6 During a phone conference on September 6, 2016 with Honorable Judge Deborah Ryan  
7 and attorney Mike Armstrong the sealing of the items referenced above, namely photographs of  
8 the victim, were discussed and counsel for Defendant indicated he did not object to the sealing  
9 of exhibits depicting the victim.

10 In order to protect the victim's privacy and anonymity pursuant to California law, I  
11 request the court to order that the exhibits that include any and all photographs of the victim,  
12 medical records and reports referenced above and specified in Attachment One be sealed. I am  
13 further requesting that any and all court documents referencing the victim's true identity be  
14 redacted from the victim's true identity to Jane Doe as previously ordered.

15 According to P.C. Section 293.5, Identity of Sex Offense Victim, the court, at the  
16 request of the victim, may order the identity of the victim in all records to be identified as Jane  
17 Doe. Additionally, a victim has a right of privacy that is protected by California law.

18 Accordingly, the People request that the Court seal exhibits that are photographs of the  
19 victim, her private parts, medical exams and reports of medical exams.

20  
21 Dated: September 8, 2016

  
Alalen Kianerci  
Deputy District Attorney

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**ATTACHMENT ONE: Exhibit List**

IN THE SUPERIOR COURT CALIFORNIA

COUNTY OF SANTA CLARA

People of the State of California

PLAINTIFF

Brock Allen Turner

DEFENDANT

(ENDORSED)  
**FILED**  
APR 12 2016

DAVID H. YAMASAKI  
Chief Executive Officer/Clerk  
Superior Court of California  
BY Shante Perry DEPUTY

PLAINTIFF'S EXHIBIT LIST

Case No.

Honorable: Aaron Persky  
Clerk: J. Paura / J. Nashed

Dept:89

B1577162

Exh #	DESCRIPTION	ID	Adm
1.	Oversized diagram of crime scene	3/17/16	3/23/16
2.	Night time photograph of trees, shed and portion of a basketball court taped off	3/17/16	3/18/16
3.	Night time photograph of tree, golf cart and shed	3/17/16	3/18/16
4.	Night time photograph of basketball court	3/17/16	3/18/16
5.	Photograph of shed and golf cart and tree	3/17/16	3/18/16
6.	Photograph of panties with a ruler next to them on the ground	3/17/16	3/18/16
7.	Night time photograph of the bottom of the access driveway with a black garbage can, blue garbage bin and 3 trees in the background	3/17/16	3/18/16
8.	Photograph of a cell phone on top of a blue case with a ruler on the ground	3/17/16	3/18/16
9.	Photograph of crime scene with cell phone and panties on the ground	3/17/16	3/18/16
10.	Night time photograph of 3 emergency medical response personnel around the victim	3/17/16	3/18/16
11.	Night time photograph of 1 emergency medical response person leaning over victim	3/17/16	3/18/16
12.	Night time photograph of victim on ground 2 emergency medical response personnel around the victim	3/17/16	3/18/16
13.	Night time photograph of victim on her back	3/17/16	3/18/16
14.	Night time photograph of victim in the fetal position on ground	3/17/16	3/18/16
15.	Photograph of the top of the victim's head while on a gurney	3/17/16	3/18/16
16.	Photograph of the victim's right side of head while on a gurney	3/17/16	3/18/16
17.	Photograph of victim on hospital gurney	3/17/16	3/18/16
18.	Timeline	3/17/16	3/23/16
19.	Photograph of crime scene in daytime	3/17/16	3/18/16
20.	Photograph of crime scene in daytime with dumpster and golf cart beyond the taped off area	3/17/16	3/18/16
21.	Photograph of crime scene in daytime taken from basketball court	3/17/16	3/18/16
22.	Photograph of crime scene in daytime with the golf cart to the left, shed, and building beyond 3 trees	3/17/16	3/18/16

23.	Photograph of taped off scene in daytime taken from the la with a portion of the basketball court on left	3/17/16	3/18/16
24.	Photograph of basketball court with 2 kids on skateboards / labeled #1 with black X and initials on it	3/17/16	3/18/16
25.	Photograph of partial basketball court and trees beyond it / labeled #2 with a black circle on it	3/17/16	3/18/16
26.	Photograph of corn of a basketball court, fence with a white building beyond it / labeled #3 with circled black X and initials on it	3/17/16	3/18/16
27.	Photograph of close up picture of wooden shed / labeled #4 with a black stick person and initials on it	3/17/16	3/18/16
28.	Photograph of bushes, a portion of a basketball court off to the right beyond some trees / labeled #5 w/ a circled black X & initials on it	3/17/16	3/18/16
29.	C.D. of voicemail message	3/17/16	3/21/16
29A.	Transcript of C.D. voicemail message	3/18/16	DEMONSTRATIVE
30.	Screen shot of text messages labeled Lucas Moose phone # ending in 0389	3/17/16	3/21/16
31.	Photograph of basketball court with 2 kids on skateboards / labeled #1 with red X and initials on it	3/18/16	3/21/16
32.	Photograph of partial basketball court and trees beyond it / labeled #2 with a red X on it	3/18/16	3/21/16
33.	Photograph of corn of a basketball court, fence with a white building beyond it / labeled #3 with red & black X and initials on it	3/18/16	3/21/16
34.	Photograph of close up picture of wooden shed / labeled #4 with a red stick person and initials on it	3/18/16	3/21/16
35.	Photograph of bushes, a portion of a basketball court off to the right beyond some trees / labeled #5 with red X and initials on it	3/18/16	3/21/16
36.	Photograph of Mr. Brock Turner	3/18/16	3/21/16
37.	Uber Receipts	3/18/16	3/21/16
38.	Photograph of the left side of Ms. Doe's head with vegetation in her hair	3/18/16	3/21/16
39.	Photograph of the right side of Ms. Doe's head with vegetation in her hair	3/18/16	3/21/16
40.	Photograph of back of Ms. Doe's head with vegetation & a clip in her hair	3/18/16	3/21/16
41.	Photograph of close up buttocks with multiple abrasions	3/18/16	3/21/16
42.	Photograph of ruler to show measurements of abrasions on the right buttock cheek	3/18/16	3/21/16
43.	Photograph of close up of ruler to show measurements of abrasions on the left buttock cheek	3/18/16	3/21/16
44.	Photograph of ruler to show measurements of abrasions on skin next to hospital gown	3/18/16	3/21/16
45.	Photograph of close up of ruler to show measurements of abrasions on skin next to hospital gown (numbers on ruler are unclear and blurry).	3/18/16	3/21/16
46.	Photograph of right side of neck	3/18/16	3/21/16
47.	Photograph of abrasions below right clavicle	3/18/16	3/21/16
48.	Photograph of abrasions at the base of neck & upper back	3/18/16	3/21/16
49.	Photograph of buttocks with multiple abrasions	3/18/16	3/21/16
50.	Photograph of buttocks with multiple abrasions with a ruler to take measurements	3/18/16	3/21/16
51.	Photograph of ruler to show measurements of abrasions on right buttock (repeat of exhibit #42)	3/18/16	3/21/16

52.	Close up photograph of _____ to show measurements of abrasions on the left buttock cheek (repeat of exhibit #43)	3/18/16	3/21/16
53.	Photograph of ruler to show measurements of abrasions on skin next to hospital gown (repeat of exhibit #44)	3/18/16	3/21/16
54.	Photograph of right side of neck	3/18/16	3/21/16
55.	Photograph of abrasions below right clavicle	3/18/16	3/21/16
56.	Diagram of female genitalia	3/18/16	3/21/16
57.	Photograph of female genitalia	3/18/16	3/21/16
58.	Photograph of female genitalia	3/18/16	3/21/16
59.	Photograph of female genitalia with debris inside labia minora	3/18/16	3/21/16
60.	Photograph of diagram body and of findings	3/18/16	3/21/16
61.	Photograph of diagram head/neck and of findings	3/18/16	3/21/16
62.	Photograph of diagram genital and of findings	3/18/16	3/21/16
63.	Screen shot of phone labeled <u>Jane Doe II</u> dated 1/18/15 phone # ending in 2151	3/18/16	3/21/16
64.	Screen shot of text messages to <u>Jane Doe II</u> & Julia	3/18/16	3/21/16
65.	Screen shot of phone labeled <u>Jane Doe II</u> outgoing call phone # ending in 2151	3/21/16	3/23/16
66.	Screen shot of phone labeled Julia Maggioncalda phone # ending in 0678	3/21/16	3/23/16
67.	DNA Chart dated 3/20/15	3/21/16	3/25/16
68.	Large alcohol chart	3/21/16	3/23/16
69.	Uber receipt dated 1/18/15 in the amount of \$16.98	3/22/16	3/23/16
70.	Photograph of a black wallet with a condom	3/22/16	3/23/16
71.	Photograph of shed and trees with a person in a red shirt beyond the trees labeled #6	3/23/16	3/23/16
72.	Stanford Department of Public Safety photo line-up procedure & checklist	3/23/16	3/23/16
73.	CD (Video) of Brock Turner's interview	3/25/16	3/28/16
73A.	Transcript of Brock Turner's video interview	3/25/16	Demonstrative
74.	CD (Audio) of Brock Turner's interview	3/25/16	3/28/16
74A.	Transcript of Brock Turner's audio interview	3/25/16	Demonstrative
75.	Photograph of Mr. Turner holding both hands out	3/28/16	3/28/16
76.	Photograph of the top of Mr. Turner's right hand	3/28/16	3/28/16
77.	Photograph of the top of Mr. Turner's left hand	3/28/16	3/28/16
78.	Photograph of a close up shot of the top of Mr. Turner's right hand	3/28/16	3/28/16
79.	Photograph of the top of Mr. Turner's left hand with a pen held above it	3/28/16	3/28/16
80.	Photograph of Mr. Turner's right palm	3/28/16	3/28/16
81.	Photograph of Mr. Turner's left palm	3/28/16	3/28/16
82.	Photograph of Mr. Turner's lower abdomen with his shirt held up	3/28/16	3/28/16
83.	Photograph of the back of Mr. Turner full body while facing wall & door	3/28/16	3/28/16
84.	Photograph of Mr. Turner's lower back while holding his shirt up	3/28/16	3/28/16
85.	Photograph of the left side of Mr. Turner's face	3/28/16	3/28/16

Above exhibits received by Exhibit Control as correct.

DATE: 4-12-16 Deputy Clerk Shantel Hernandez

IN THE SUPERIOR COURT CALIFORNIA  
COUNTY OF SANTA CLARA

(ENDORSED)  
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People of the State of California

PLAINTIFF

Brock Allen Turner

DEFENDANT

DEFENDANT'S EXHIBIT LIST

Case No.

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Honorable: Aaron Persky  
Clerk: J. Nashed

Dept:89

Exh #	DESCRIPTION	ID	Adm
A.	Photograph of lawn and trees with picnic tables and a basketball court off to the far left and a building off to the right.	03/18/16	3/28/16
B.	Kim Fromme, Ph.D / Curriculum Vita	03/22/16	03/22/16
C.	Photograph of shed and trees with a person in a red shirt beyond the trees	03/22/16	03/22/16
D.	Photograph of close up picture of wooden shed	03/23/16	3/28/16
E.	Photograph of trees with a shed off to the left and a group of 4 people to the right	03/25/16	3/28/16
F.	Photograph of a trail with a picnic table in the right corner and a basketball court beyond lawn chairs and trees	03/25/16	3/28/16

Above exhibits received by Exhibit Control as correct.

DATE: APR 12 2016 Deputy Clerk SH



IN THE SUPERIOR COURT CALIFORNIA  
COUNTY OF SANTA CLARA

(ENDORSED)  
**FILED**  
APR 12 2016  
DAVID H. YAMASAKI  
Chief Executive Officer/Clerk  
Superior Court of SA County of Santa Clara  
BY *[Signature]* DEPUTY

People of the State of California

PLAINTIFF

Brock Allen Turner

DEFENDANT

**COURT EXHIBIT LIST**

Honorable: Aaron Persky  
Clerk: J. Nashed

Dept:89

Case No.

B1577162

Exh #	DESCRIPTION	ID	Adm
1	Santa Clara County Crime Lab Blood & Urine Drug Worksheet	03/21/16	

Above exhibits received by Exhibit Control as correct.

DATE: 4-12-16 Deputy Clerk *[Signature]*

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**PROOF OF SERVICE**

STATE OF CALIFORNIA                    ) People v. BROCK ALLEN TURNER  
  ) ss.  
COUNTY OF SANTA CLARA            ) Docket No. B1577162

I am employed in the County of Santa Clara, State of California. I am over the age of eighteen years, and not a party to the above-entitled action. My business address is: Office of the District Attorney, 70 West Hedding Street, West Wing, San Jose, CA 95110

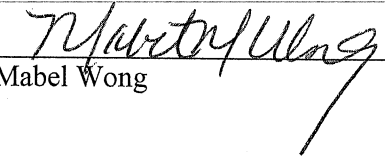
On September 8, 2016, I served the following documents upon the interested parties in this action by the method(s) indicated below:

**ORDER, DECLARATION & MEMORANDUM TO SEAL TRIAL EXHIBITS  
DEPICTING JANE DOE & MEDICAL REDORDS TO PRESERVE ANONYMITY,  
PURSUANT TO PENAL CODE SECTION 293.5 & RIGHT TO PRIVACY**

[X] BY FACSIMILE TRANSMISSION: by faxing a true copy thereof to the recipient at the facsimile number indicated:

Michael Armstrong, ESq.  
(650) 362-4198

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on September 8, 2016, at San Jose, California.

  
\_\_\_\_\_  
Mabel Wong