

MILLER BARONDESS, LLP
ATTORNEYS AT LAW
1999 AVENUE OF THE STARS, SUITE 1000 LOS ANGELES, CALIFORNIA 90067
TEL: (310) 552-4400 FAX: (310) 552-8400

1 LOUIS R. MILLER (State Bar No. 54141)
smiller@millerbarondess.com
2 DANIEL S. MILLER (State Bar No. 218214)
dmiller@millerbarondess.com
3 SCOTT J. STREET (State Bar No. 258962)
sstreet@millerbarondess.com
4 MILLER BARONDESS, LLP
1999 Avenue of the Stars, Suite 1000
5 Los Angeles, California 90067
Telephone: (310) 552-4400
6 Facsimile: (310) 552-8400

7 BRIAN E. WATKINS (State Bar No. 190599)
bwatkins@brianwatkinslaw.com
8 BRIAN E. WATKINS & ASSOCIATES
925 B Street, Suite 402
9 San Diego, California 92101
Telephone: (619) 255-5930
10 Facsimile: (619) 255-5639

11 Attorneys for Plaintiffs S.R. NEHAD, K.R.
NEHAD, and ESTATE OF FRIDOOON
12 RAWSHAN NEHAD

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15
16 S.R. NEHAD, an individual, K.R.
17 NEHAD, an individual, ESTATE OF
FRIDOOON RAWSHAN NEHAD, an
18 entity,

19 Plaintiffs,

20 v.

21 SHELLEY ZIMMERMAN, in her
personal and official capacity as Chief
22 of Police, NEAL N. BROWDER, an
individual, CITY OF SAN DIEGO, a
23 municipality, and DOES 1 through 10,
inclusive,

24 Defendants.

CASE NO. 15-cv-1386-WQH-NLS

[Assigned to the Hon. William Q.
Hayes]

**PLAINTIFFS' NOTICE OF NON-
OPPOSITION TO MEDIA'S
MOTION TO INTERVENE AND
UNSEAL VIDEO OF THE
SHOOTING**

Date: December 15, 2015
Time: 9:00 a.m.
Dept.: 14B, Annex

25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NOTICE OF NON-OPPOSITION

Plaintiffs S.R. Nehad, K.R. Nehad and the Estate of Fridoon Rawshan Nehad (collectively, “Plaintiffs”) do not oppose the media’s motion to intervene to obtain the video that shows San Diego police officer Neal Browder shooting Fridoon Nehad to death.

Plaintiffs believe the video should be released. The video is not confidential. It belongs to a private business. It recorded an encounter between a police officer and a citizen on a public street. Other people have seen the video. (Declaration of Wesley Doyle, dated June 25, 2015, Dkt. 3-4.)

Respectfully submitted,

DATED: November 30, 2015 MILLER BARONDESS, LLP

By: /s/ Scott J. Street
SCOTT J. STREET
Attorneys for Plaintiffs S.R. NEHAD,
K.R. NEHAD, and ESTATE OF
FRIDOON RAWSHAN NEHAD

MILLER BARONDESS, LLP
ATTORNEYS AT LAW
1999 AVENUE OF THE STARS, SUITE 1000 LOS ANGELES, CALIFORNIA 90067
TEL: (310) 552-4400 FAX: (310) 552-8400