EXHIBIT B

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1
                         UNITED STATES DISTRICT COURT
  2
                        CENTRAL DISTRICT OF CALIFORNIA
  3
                               WESTERN DIVISION
  4
       CORY SPENCER, an individual; DIANA )
  5
       MILENA REED, an individual; and
       COASTAL PROTECTION RANGERS, INC., a )
  6
       California non-profit public benefit)
  7
       corporation,
                                            ) Case No.
                                            ) 2:16-cv-02129-SJO-RAO
  8
                       Plaintiffs,
  9
                  vs.
10
      LUNADA BAY BOYS, et al.,
11
                       Defendants.
12
13
14
15
16
17
                VIDEOTAPED DEPOSITION OF DIANA MILENA REED
18
                          Santa Monica, California
19
                         Monday, October 24, 2016
20
21
22
23
24
       REPORTED BY:
       Jimmy S. Rodriguez
25
       CSR No. 13464
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Page 1

Case 2:16-cv-02129-SJO-RAO Document 274-3 Filed 07/21/17 Page 3 of 8 Page ID #:5949

1	sentence it says you wanted to paddle out to	11:49
2	experience the large waves found off Lunada Bay.	11:49
3	In this sentence in your complaint here,	11:49
4	did you mean that you wanted to go out and try to	11:49
5	surf or you just wanted to paddle off to paddle	11:49
6	out to see what the waves looked like?	11:49
7	MR. FRANKLIN: Vague and ambiguous.	11:49
8	THE WITNESS: I wanted to paddle out to	11:49
9	surf.	11:49
10	BY MS. HEWITT:	11:49
11	Q Did you intend to surf?	11:49
12	A I did intend to surf, yes.	11:49
13	Q Did you feel prepared that day to catch a	11:49
14	big wave, whatever you thought was a big wave that	11:49
15	day?	11:49
16	A I felt prepared that day to attempt to	11:49
17	catch some of the waves on the inside for the	11:49
18	conditions that were out that day.	11:49
19	Q How did you decide to go to Lunada Bay	11:49
20	that day?	11:49
21	A I don't remember specifically how I	11:49
22	decided to go to Lunada Bay that day. I would	11:50
23	assume that the swell there was a good swell and	11:50
24	it wasn't, you know, too big, you know, and it was a	11:50
25	size that was something that I could try and	11:50
	Page	103
4	· · · · · · · · · · · · · · · · · · ·	

1	\attempt. (\attempt.) \attempt.	
2		11:50
	Q I think earlier we decided that we weren't	
3	sure whether or not you'd been to Lunada Bay before	11:50
4	that day.	11:50
5	A I didn't say that.	11:50
6	Q My fault.	11:50
7	Had you been to Lunada Bay before	11:50
8	January 29, 2016?	11:50
9	A I had been to the top of the bluff.	11:50
10	Q Top of the bluff, okay.	11:50
11	Do you remember is it like towards the	11:50
12	beginning of January, middle of January?	11:50
13	A It was towards the beginning of January.	11:50
14	I think that it was around the 6th of January	11:50
15	approximately.	11:50
16	Q And before that time on approximately the	11:50
17	6th of January, had you ever been to the top of the	11:50
18	bluff at Lunada Bay before?	11:50
19	A I don't think so. I may have at one point	11:51
20	driven up the coast looking at the coast, but I	11:51
21	don't know if I stopped at Lunada Bay or not. And	11:51
22	that wasn't for surfing. It was for scenic reasons.	11:51
23	Q Okay. Just to be clear so I don't get it	11:51
24	wrong again: Before January 6, 2016, had you ever	11:51
25	been down to the beach at Lunada Bay?	11:51

Page 104

Case 2:16-cv-02129-SJO-RAO Document 274-3 Filed 07/21/17 Page 5 of 8 Page ID #:5951

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1	A I didn't go down to the beach on	11:51
2	January 6th.	11:51
3	Q I understand that, I'm just making sure	
4	before that date you had never gone to the beach	
5	there?	11:51
6	A No.	11:51
7	Q And had you ever stopped at Lunada Bay at	
8	all before January 6, 2016?	11:51
9	MR. FRANKLIN: Asked and answered.	11:52
10	THE WITNESS: Yeah, I may have when I was	
11	looking at the coast, I don't know.	11:52
12	BY MS. HEWITT:	11:52
13	Q Okay. So in January 6, 2016, where did	11:52
14	you stop on the bluff?	11:52
15	A I went there to watch my friend surf.	11:52
16	Q Who was that?	11:52
17	A It was a big day. Much too big for me.	11:52
18	So I just went there to watch.	11:52
19	Q Who was your friend?	11:52
20	A Well, my friend Jordan Wright, boyfriend,	11:52
21	and his friends.	11:52
22	Q Who was his friends that you went to	11:52
23	watch?	11:52
24	A One of them was my friend Preston, I don't	11:52
25	remember his last name. A friend of Jordan's called	11:52
	_	

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Page 105

Case 2:16-cv-02129-SJO-RAO Document 274-3 Filed 07/21/17 Page 6 of 8 Page ID #:5952

1	Q Okay. So in June, would you have been	12:57
2	about four and a half months pregnant or so?	12:57
3	A I don't know. I would have to calculate	12:57
4	it, I don't remember.	12:57
5	Q Do you remember being pregnant when you	12:57
6	were surfing in June, though?	12:57
7	A Yes, hmm-mm.	12:57
8	Q When was the last time you've been	12:57
9	surfing?	12:57
10	A That was about the last time.	12:57
11	Q All right. So, going back to February 5,	12:57
12	2016, I believe you told me that you went to	12:58
13	Lunada Bay to take photos of Jordan; is that	12:58
14	Correct?	12:58
15	Yes.	12:58
16	Q What made Jordan decide to go that day, to	
17	go surf?	12:58
18	A You know, I don't remember what his reason	
19	was to go that day. I just remember accompanying	
20	him to take photos.	12:58
21	Q Did you talk to anybody at the L.A. Times	12:58
22	before February 5, 2016?	12:58
23	A I don't think so, no.	12:58
24	Q Do you have any idea as you sit here today	
25	how the writer and photographer from the	
		12:58
	Page :	146

Case 2:16-cv-02129-SJO-RAO Document 274-3 Filed 07/21/17 Page 7 of 8 Page ID #:5953

	the second secon	
1	A So I can't say one way or the other.	13:10
2	Q I'm not asking you to say one way or the	13:10
3	other. I'm asking you to state if right now you	13:10
4	have a memory of being intimidated by someone on top	13:10
5	of the bluff.	13:10
6	MR. FRANKLIN: Vague and ambiguous.	13:10
7	THE WITNESS: I would have to think about	13:10
8	it more, I just don't know.	13:10
9	BY MS. HEWITT:	13:10
10	Q Do you remember that right now?	13:10
11	MR. FRANKLIN: Vague and ambiguous.	13:10
12	THE WITNESS: Right now, I don't remember	13:10
13	what happened on top of the bluff much, so it would	13:10
14	be hard for me to make that sorry.	13:10
15	BY MS. HEWITT:	13:10
16	Q Do you recall any vandalism that day?	13:10
17	A I don't recall vandalism on February 5th.	
18	Q Did the police escort you down the bluff	13:10
19	that day?	13:10
20	A I don't know.	13:10
21	Q You don't remember?	13:10
22	A I don't remember.	13:10
23	Okay Coing to February 12:	13:10
24	described in your complaint who did	13:11
25	go to Lunada Bay on February 12442	13:11
		- —

Page 156

1	A You know T don't many	
2	A You know, I don't remember the specific	A 4
	reasons, but I think that Jordan wanted to go surf	3.7
3	that day and I couldn't surf; so like I said, if I'	n 13:11
4	not surfing I like to take photos so it was my	13:11
5	reason for going.	13:11
6	Q Has Jordan as far as you know ever wanted	13:11
7	to go surf at Lunada Bay and has decided not to	13:11
8	because of any localism there?	13:11
9	MR. FRANKLIN: Vague and ambiguous, calls	13:11
10	for speculation.	13:11
11	THE WITNESS: Well, I was with him on	13:11
12	January 29, 2016, when we decided not to surf.	13:11
13	BY MS. HEWITT:	13:11
14	Q Prior to going on a particular day did you	
15	decide to stay home because of any localism issues?	
16	MR. FRANKLIN: Vague and ambiguous.	13:11
17	THE WITNESS: Well, I mean if there wasn't	
18	localism there I would have been surfing there all	
19	winter as often as I surf in Malibu and Ventura and	
20	other places, so yeah, I would be there as often as	
21	it was good.	13:12
22	BY MS. HEWITT:	13:12
23		13:12
24	Solly, that was my	13:12
25	fault for a vague question.	13:12
£ J	Do you have any recollection of instances	13:12
	Page	157
	the control of the co	