

HOW DID YOU
WIN THAT CASE?

\$11.75 MILLION

THE CASE OF THE
TEXTING SHERIFF'S DEPUTY

*Olin vs. County of Los Angeles,
Los Angeles County Sheriff's Dept.*

Holding a Public Entity Accountable
For Death of Cyclist
Struck and Killed by a Distracted Deputy







THE STORY
TOLD BY
DEPUTY WOOD

Mulholland Highway, Los Angeles County, California



Area Of Collision

Calabasas High School

Mulholland Highway



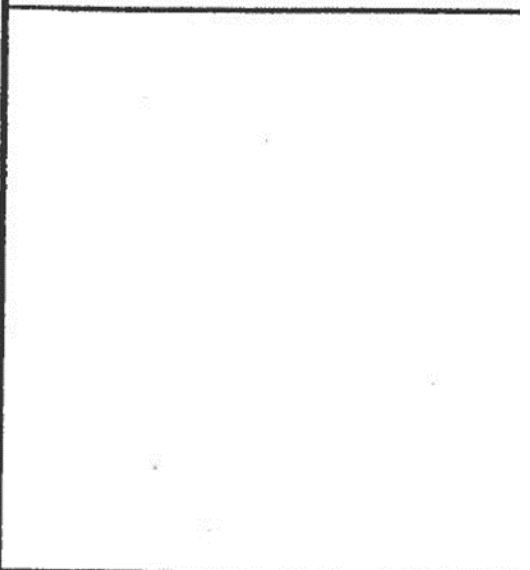


- “He swerved out in front of me.”
- “He pulled out in front of me. So I kind of went right to avoid him.”
- “Suddenly a bicyclist entered his lane of travel from the bicycle lane and rode into the path of the vehicle.”
- **Defendant’s Written Statement – Driven Into The Path of My Patrol Vehicle**

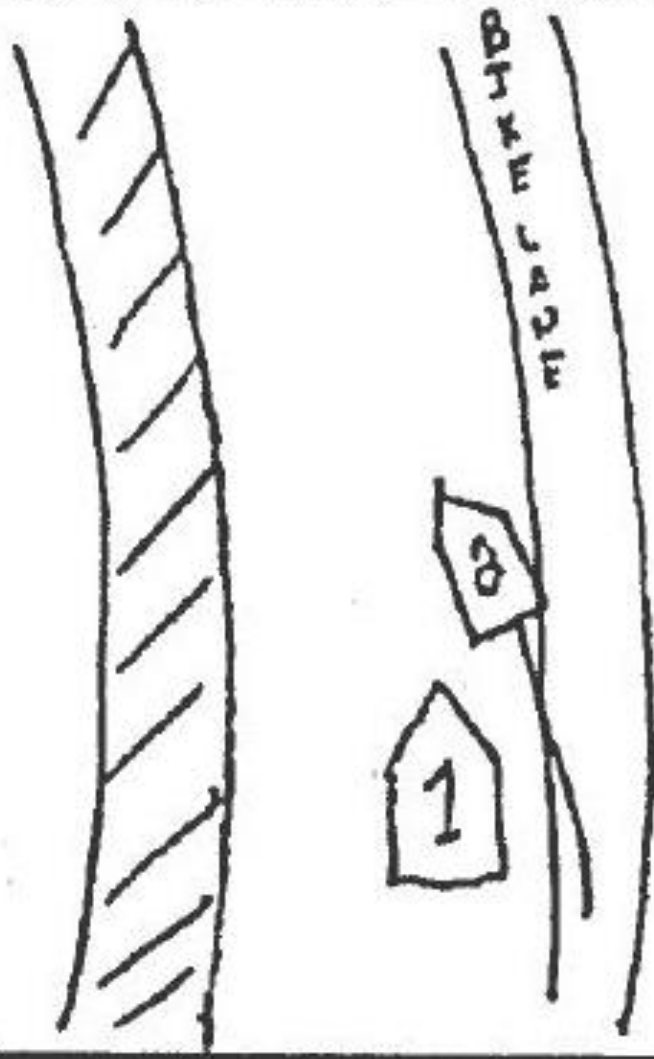
013-07095-2248-470

INSTRUCTIONS: Complete form w
more space is needed to complete

DRAW A DIAGRAM AND SHOW HOW ACCID
Show your Vehicle as 1 the other Vehicles as



EXPLAIN CLEARLY HOW ACCIDENT OCCUR
MULTI-LANE HIGHWAY AFTER
MY WAY BACK TO MY PATR
LANS OF TRAVEL FROM THE BI
PATH OF MY PATROL VEHICL



r supervisor. If
ional sheet.

INDICATE
NORTH

if point of impact.
if stop signs, signals
ks



ELING EASTBOUND ON
A SCHOOL. I WAS MAKING
BICYCLIST ENTERED MY
HAVE DRIVEN IN THE



OLIN WAS STRUCK IN THE BIKE LANE



Travel Lane

Bike Lane

Merge Lane

Merge Area For Traffic
That Has Turned Right
From Daguerre Ave



Area Of Impact

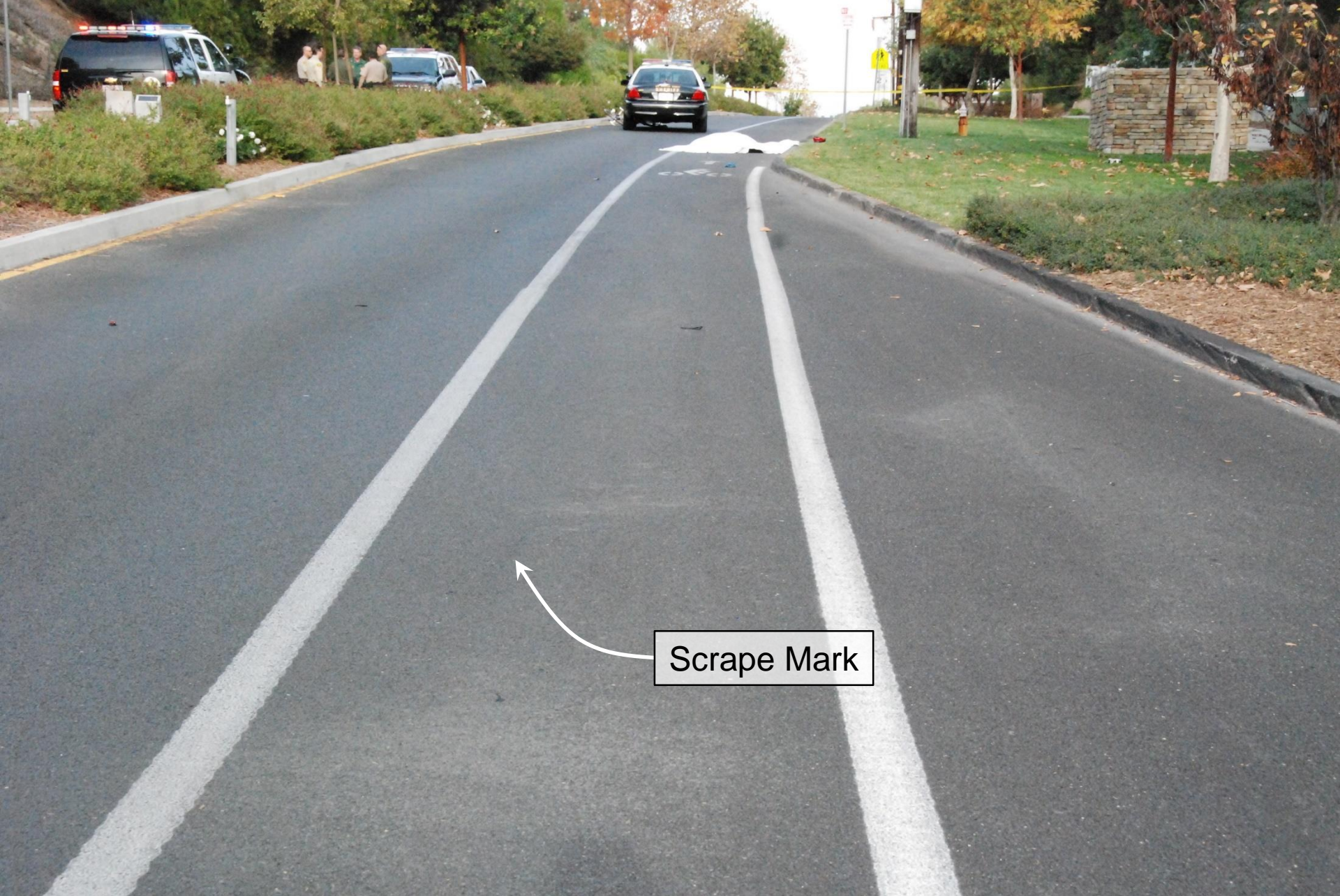
Alignment Change



Area Of Impact



Eastbound Mulholland Highway



Scrape Mark Located In Designated Bike Travel Lane

Scrape Mark

Point A: AOI, Paint Chip, Scrape Mark







GATHERING THE DATA TO SHOW DRIVER DISTRACTION

DATA TO WORK WITH

- **Sheriff's Vehicle**

Mobile Digital Computer (MDC)

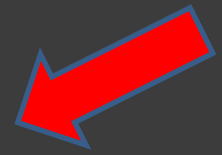
Global Positioning Satellite (GPS) data

Vehicle Speed Data

Messaging Data

- **Bicycle - Garmin GPS Data**

Lat	Long	Speed	Direction	Time
34.13798	-118.627	0	-	13:03:22
34.13804	-118.627	3	NW	13:03:32
34.13811	-118.628	10	W	13:03:42
34.13801	-118.628	13	S	13:03:52
34.13766	-118.628	0	-	13:04:02
34.13754	-118.628	19	E	13:04:12
34.13754	-118.627	41	E	13:04:22
34.13785	-118.624	44	E	13:04:33
34.13854	-118.622	44	NE	13:04:43
34.1395	-118.62	40	NE	13:04:53
34.14061	-118.619	48	NE	13:05:03
34.14172	-118.617	8	NE	13:05:13
34.14173	-118.617	0	-	13:05:23





1:05:23 – 0 mph

1:05:13 – 8 mph

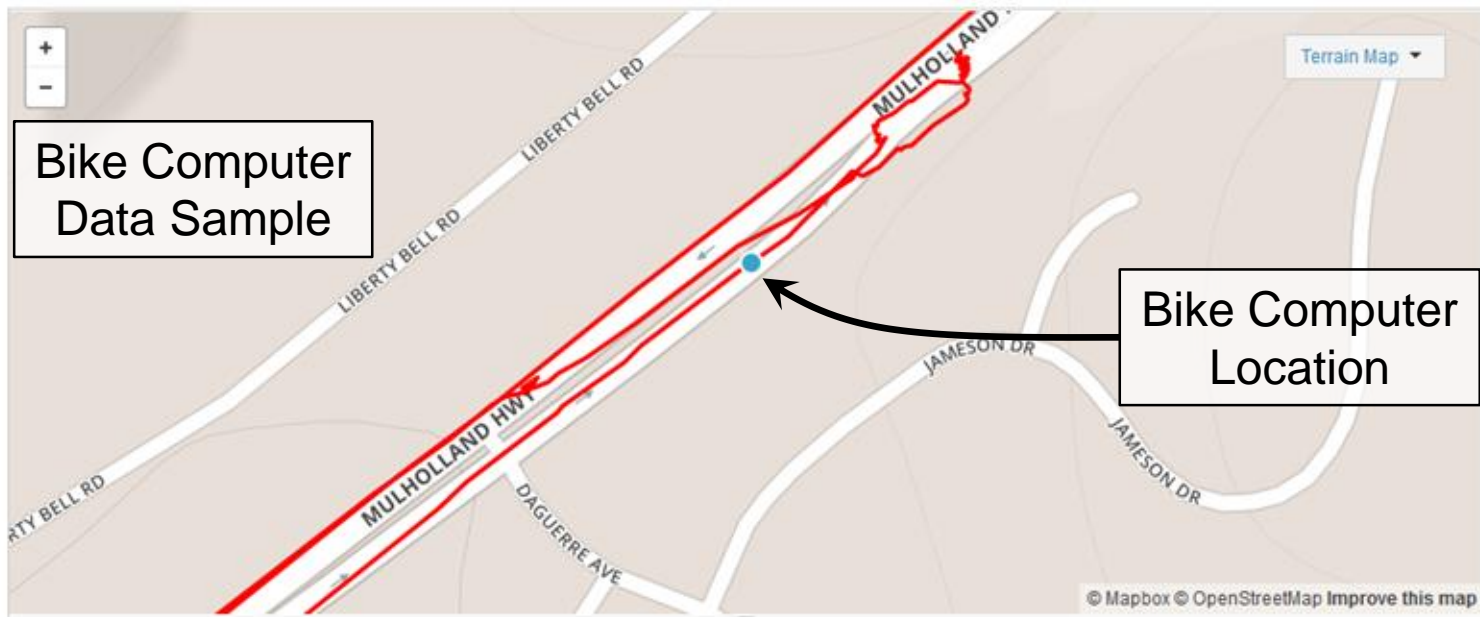
1:05:03 – 48 mph

Area Of Collision At Alignment Change

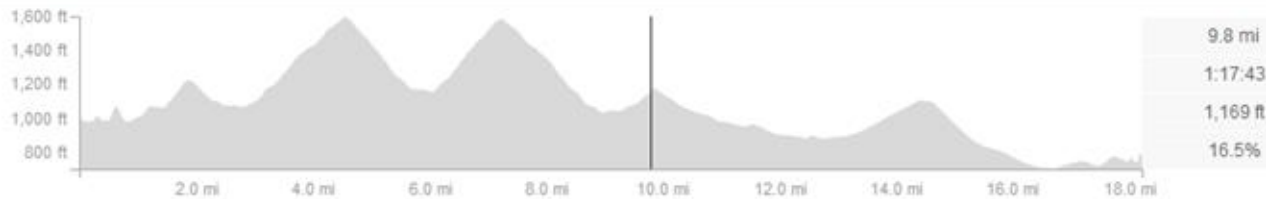


Garmin Edge 800 GPS-Enabled Bike Computer

Bike Computer Data Sample



Bike Computer Location



Segments





DEPUTY WOOD'S PERSONAL CELL PHONE

TEXT RECORDS ORIGINALLY PRODUCED TO COUNTY BY VERIZON

Marina	M	8059148329	12/8/2013 13:01
Marina	M	8059148329	12/8/2013 13:04

**Last text over 1 minute prior to crash
County and D.A. assume texting not a factor**

GETTING THE
CELL
RECORDS

GET A
RELEASE

Code of Civil Procedure § 1985.3(f).
“A subpoena duces tecum for personal records maintained by a telephone corporation which is a public utility, as defined in Section 216 of the Public Utilities Code, shall not be valid or effective unless it includes a consent to release, signed by the consumer whose records are requested, as required by Section 2891 of the *Public Utilities Code.*”

- **CONSENT FOR RELEASE OF PHONE RECORDS BY JOHN SMITH**

- I am John Smith . I am a Defendant in the matter of Peter Plaintiff v. *Danny Defendant* (Case No. 1234567, Los Angeles Superior Court). On October 1, 2020 I had the following cell phone/wireless number: 310-555-1234. My wireless/cellphone carrier was AT&T. The Plaintiffs in this matter are issuing a subpoena for my cellphone/wireless records from my cellphone/wireless carrier AT&T from October 1, 2020. The items sought by Plaintiffs' subpoena are the following:
 - 1. All documents and records that refer to, describe, detail, concern, summarize, and/or reflect all calls sent or received by any cellular phone, mobile phone, wireless phone, smart phone, tablet, and/or any electronic device associated with the phone number 310-555-1234 for the date of October 1, 2020. This request includes but is not limited to all call logs and/or billing statements, and any other documents and records that reflect the time of the call, the length of the call, the location of where the call originated from, the location where the call was received, cell tower information, the phone number of the person making the call, the phone number of the person receiving the call, and the number of any other participants in the call.

- **2. All documents and records that refer to, describe, detail, concern, summarize, and/or reflect all messages (including text messages) sent or received by any cellular phone, mobile phone, smart phone, tablet, and/or any electronic device associated with the phone number 310-555-1234 for the date of October 1, 2020. This request includes but is not limited to the actual message itself, as well as all logs and/or billing statements, and any other documents and records that reflect the time of the message, the numbers that sent the message, the number that received the message, the location of where the message originated from, cell tower information, switcher information, routing information, the location of where the message received, and the actual contents of message.**

- **3. Any documents and records that refer to and/or reflect the data usage for any cellular phone, mobile phone, smart phone, tablet and/or any electronic device associated with the phone number 310-555-1234 for the date of October 1, 2020. This request includes but is not limited to billing statements as well as the amount of data used, the date of the data used, and the time the data was used.**

I hereby provide consent and authorize AT&T to release and produce the records and documents requested in items 1, 2, and 3 listed above to all parties in the Peter Plaintiff v. *Danny Defendant et al.* matter, including the service responsible for acting as deposition officer and/or serving the subpoena and obtaining documents under the terms of the subpoena.

Motion to Compel to Sign the Release

**GETTING THE
CELL
RECORDS**

**WHAT IF
THEY WON'T
SIGN THE
RELEASE?**

CCP § 2031.010 states that Plaintiffs have the right to request documents that are within, “the possession, custody, or control,” of the Defendant. Danny Defendant literally has control over the phone records at AT&T because it is his release that controls whether AT&T can release the records.

GETTING THE
CELL
RECORDS

***Negro v. Superior Court* (2014) 230 Cal.App.4th 879, 897-98: Court coerced consent to sign a release is neither new nor novel. [State Court ordered release prevented Google from using Federal law to block production of emails.]**

WHAT IF
THEY WON'T
SIGN THE
RELEASE?

***Miranda v. 21st Century Insurance Co.* (2004) 117 Ca1.App.4th 913, 929-30 [affirming dismissal of action for failure to comply with court order compelling Plaintiff to sign authorization and release of medical records]**

**GETTING THE
CELL
RECORDS**

**SCOPE OF
THE RELEASE**

PRIVACY

COMPELLING NEED

OFFERS OF PROOF

PRE-CRASH

POST-CRASH

CUSTOM/HABIT

MALICIOUS CONDUCT



WHAT VERIZON PRODUCED AT THE PMK DEPOSITION



TYING
IT ALL
TOGETHER

Mulholland Highway, Los Angeles County, California



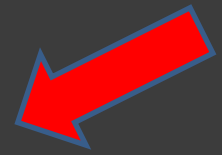
Area Of Collision

Calabasas High School

Mulholland Highway



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34.14061	-118.619	48	NE	13:05:03
34.14172	-118.617	8	NE	13:05:13
34.14173	-118.617	0	-	13:05:23



Network Element Name	Switch Type Indicator	MDN	Msg Send Date	Msg Deliver Date	Message Completion Status
Marina_SMSC89	M	(805) 914	12/8/2013 12:10:24	12/8/2013 12:10:29	1
Marina_SMSC89	M	(805) 914	12/8/2013 12:23:11	12/8/2013 12:23:17	1
Marina_SMSC89	M	(805) 914	12/8/2013 12:24:22	12/8/2013 12:24:28	1
Marina_SMSC89	M	(805) 914	12/8/2013 12:24:22	12/8/2013 12:24:28	1
Marina_SMSC89	M	(805) 914-	12/8/2013 13:04:54	12/8/2013 13:04:54	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:01:07	12/8/2013 13:01:15	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:01:40	12/8/2013 13:01:46	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:01:57	12/8/2013 13:02:01	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:04:54	12/8/2013 13:05:00	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:08:19	12/8/2013 13:08:20	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:08:36	12/8/2013 13:08:36	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:43:17	12/8/2013 13:43:18	1
Marina_SMSC89	M	(805) 914	12/8/2013 13:45:03	12/8/2013 13:45:04	1



1:05:03 – 48 mph

1:04:54 Verizon Data Point
Greater Mulwood

1:04:53 – 40 mph



DO NOT REMOVE
VEHICLE FROM
WITHOUT GETTING
PERMISSION FROM
CAPTAIN WILLIAM
LIEUTENANT STUV
AT RISK
MANAGEMENT
BUREAU 323 890 540

MDC Transmission Data

```
RBA - 114768188      Transid - 001002 001237 063612 000003      Message type = 0  
Message date/time = 12/08/13 (13342) 13:04:40  
Program name = ADMN      Destination terminal = MDC12161  
Message body (78 bytes per line):  
12/08/13 1304 TO: 222 .FROM: 224T2/D. U C4 BRO..
```



ACR EMRT 10-88 10-88 OBS STATUS TXT CODE # NEW MESSAGE CLEAR DEF WINDOW

DISPATCH INDEX
HS0121 927C
LHS0126 904I

MESSAGE DETAIL/DEFAULT WINDOW
REPLY TO MESSAGE OR SEND NEW MESSAGE
TO: 222
TEXT: YES 11/UNRESO.

DISPATCH DETAIL
904I
222 220S
MULHOLLAND HWY, CAL "CAL
R:1 H:2
BLK SMOKE SEEN FROM BEHIND
CALL FIELD, UNK WHAT IS
HUNG

MESSAGE INDEX
15:02 12/08/13 1502 TO: 222
19:31 12/08/13 1331 TO: MOTAL
19:31 12/08/13 1338 TO: MOTAL
19:31 12/08/13 1325 TO: 222
13:25 12/08/13 1304 TO: 222
3:04 12/08/13 1239 TO: 222T
2:39 12/08/13 1239 TO: 222T
2:38 #527438 TIMOTHY T METCAL

MDC-AAA-39006

222

REPLY TO MESSAGE OR SEND NEW MESSAGE

TO:

224T2

TEXT:

YES I][\NOKKO.

TO: UNIT 224T2
TEXT: YES I][\ NOKKO



Greater Mul

1:04:40 Message To Wood "U C4 BRO"

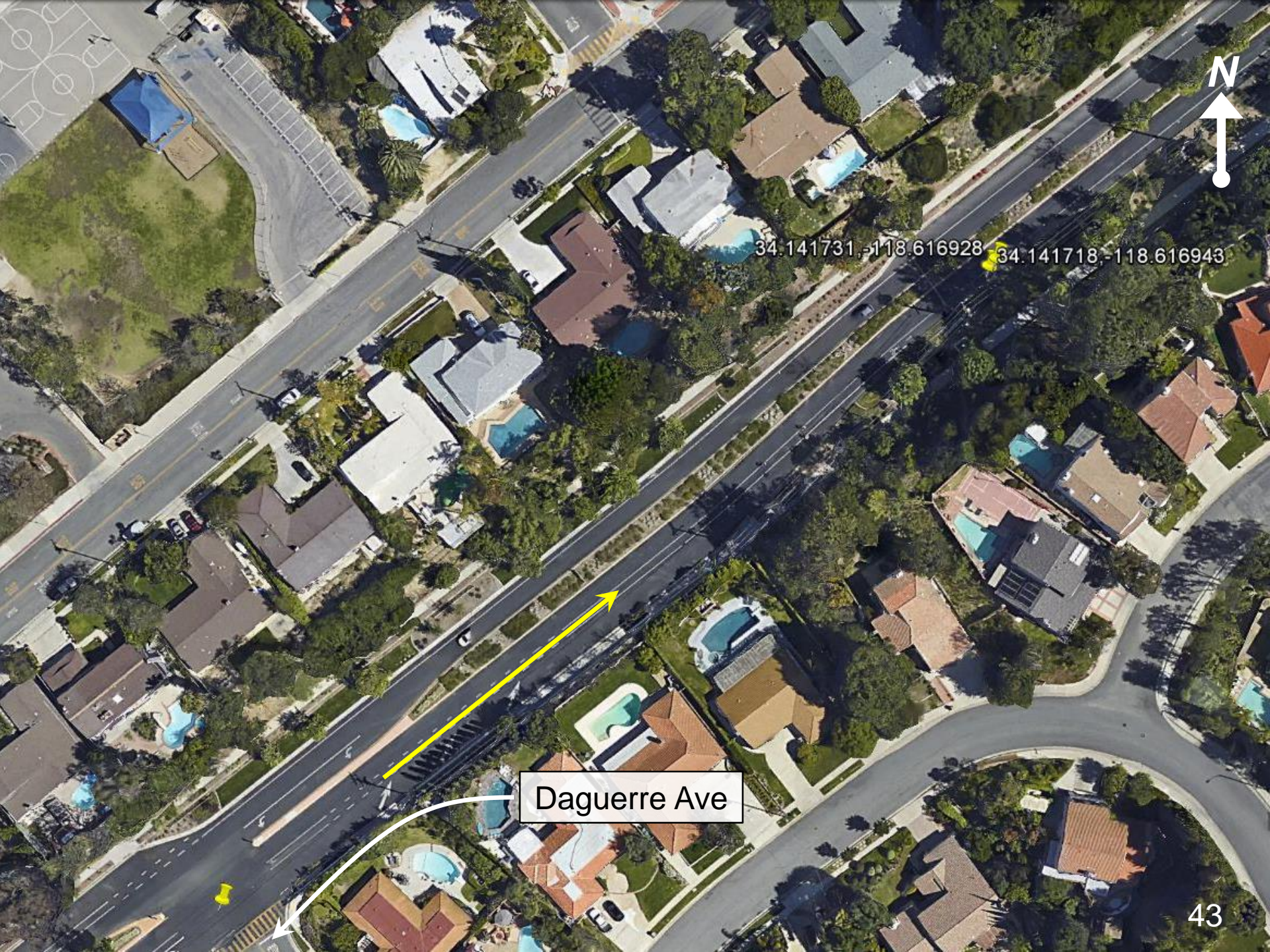
1:04:33 - 44 mph

1:04:02 - 0 mph

1:04:43 - 44 mph

1:04:22 - 41 mph

1:04:12 - 19 mph



34.141731, -118.616928 34.141718, -118.616943

Daguerre Ave



HUMAN FACTORS AND DISTRACTED DRIVING



SINGLE CHANNEL Vs Multi-Channel PROCESSING



APPLIED
COGNITIVE PSYCHOLOGY 

Research Article

Did you see the unicycling clown? Inattention blindness while walking and talking on a cell phone

Ira E. Hyman Jr , S. Matthew Boss, Breanne M. Wise, Kira E. McKenzie, Jenna M. Caggiano

First published: 23 June 2010 | <https://doi.org/10.1002/acp.1638> | Citations: 172





Los Angeles County
Sheriff's Department

April 24, 2013

INDUSTRY STATION

150 North Hudson Ave. City of Industry, CA 91744 - Phone (626) 330-3322

Distracted Driving Awareness Month

Classification

Author/Date/

(Los Angeles

actively ticketing those texting

Los Angeles County Sheriff's Department's Traffic Services Detail will be actively ticketing those texting or operating hand-held cell phones on April 24, 2013, in the City of Industry.

Drivers who break the law and place themselves and others in danger will be cited with no warnings. The current minimum ticket cost is \$159, with subsequent tickets costing at least \$279. Last April, over 57,000 tickets were written statewide for texting and hand-held cell use. There were nearly 450,000 convictions in 2012. Whether it's a ticket or a crash, as the campaign theme states, "It's Not Worth It!"



Los Angeles County
Sheriff's Department

30

INDUSTRY STATION

150 North Hudson Ave. City of Industry, CA 91744 - Phone (626) 330-3322

www.lasd.org

News Release

Leroy D. Baca, Sheriff

Distracted driving is a serious traffic safety concern that puts everyone on the road at risk. In recent years, hundreds have been killed and thousands seriously injured in California as a result of collisions that involved at least one driver who was distracted. Nationally, an estimated 3,331 died in 2011. As a result, law enforcement across the state, including Traffic Services Detail Deputies are increasingly cracking down on cell phone use and texting. This April will see over 225 local agencies plus the CHP conducting zero tolerance enforcements.



Los Angeles County
Sheriff's Department

30

INDUSTRY STATION

150 North Hudson Ave. City of Industry, CA 91744 - Phone (626) 330-3322

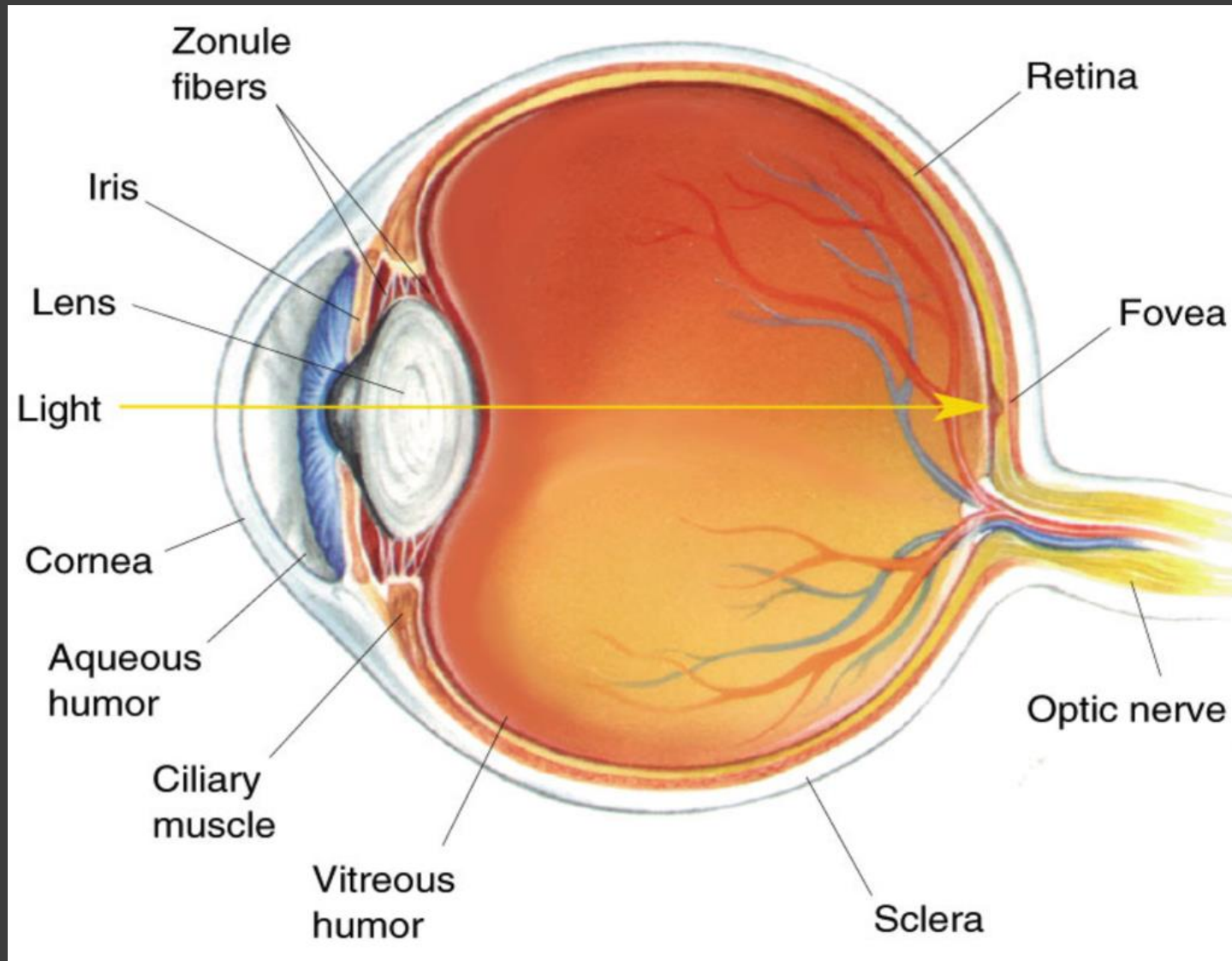
www.lasd.org

Drivers who use hand-held devices are four times as likely to get into crashes serious enough to injure themselves. Younger, inexperienced drivers under 20 years old have the highest proportion of distraction-related fatal crashes. In addition, studies show that texting while driving can delay a driver's reaction time just as severely as having a blood alcohol content of a legally drunk driver.



DISTRACTION AND VISION

FOVEAL VISION





DEFENSES TO TEXTING WHILE DRIVING





**MY ESTABLISHED CUSTOM AND
HABIT IS *NOT* TO USE MY CELL
PHONE FOR ANY REASON
(NEITHER A TEXT NOR CALL)
WHILE I AM DRIVING IN MY
PATROL VEHICLE.**

**I ACTED IN CONFORMANCE WITH
MY CUSTOM AND HABIT OF *NOT*
USING MY CELL PHONE WHILE
DRIVING ON DECEMBER 8, 2013.**

Network Element Name	Switch Type Indicator	MDN	Msg Send Date	Msg Deliver Date	Message Completion Status	Originating Address	Destination Address	Message Direction Indicator	MIN
Marina_SMSC89	M	(805) 914-	12/8/2013 12:10:24	12/8/2013 12:10:29	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 12:23:11	12/8/2013 12:23:17	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 12:34:32	12/8/2013 12:34:38	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 12:51:27	12/8/2013 12:51:28	1	(805) 914-4027	(805) 914-8329	1	0
Marina_SMSC89	M	(805) 914-	12/8/2013 12:55:39	12/8/2013 12:55:41	1	(805) 914-4027	(805) 914-8329	1	0
Marina_SMSC89	M	(805) 914-	12/8/2013 12:55:58	12/8/2013 12:55:59	1	(805) 914-4027	(805) 914-8329	1	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:00:50	12/8/2013 13:00:55	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:00:58	12/8/2013 13:01:05	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:01:07	12/8/2013 13:01:15	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:01:40	12/8/2013 13:01:46	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:01:57	12/8/2013 13:02:01	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:04:54	12/8/2013 13:05:00	1	(805) 914-8329	(805) 914-4027	2	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:08:19	12/8/2013 13:08:20	1	(805) 914-4027	(805) 914-8329	1	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:08:36	12/8/2013 13:08:36	1	(805) 914-4027	(805) 914-8329	1	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:43:17	12/8/2013 13:43:18	1	(805) 914-4027	(805) 914-8329	1	0
Marina_SMSC89	M	(805) 914-	12/8/2013 13:45:03	12/8/2013 13:45:03	1	(310) 780-0478	(805) 914-8329	1	0

(805) 914- 12/8/2013 12:34:32

Legend

-  34.150188,-118.676673
-  Feature 1

12:34:32 – 66 MPH

101

Mureau Rd

34.150188,-118.676673

Calabasas Rd



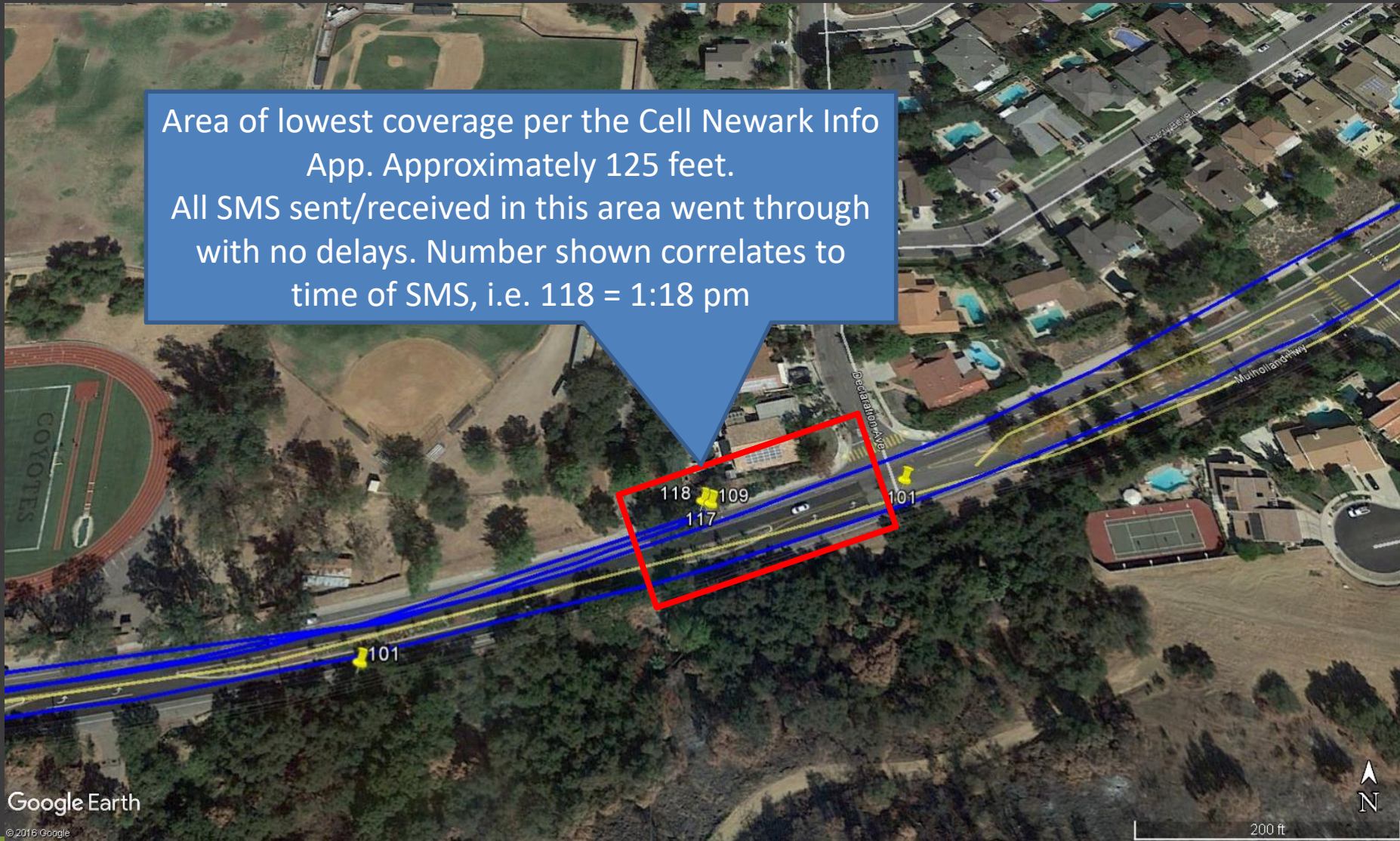
WEAK
SIGNAL

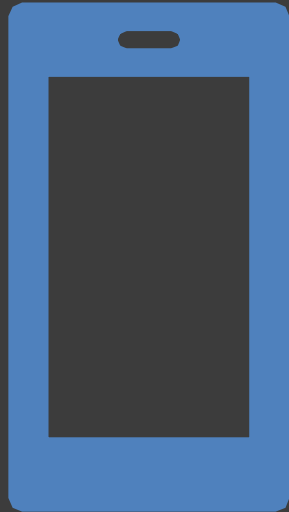
Verizon Cell Towers Around High School



Sample SMS/Voice on Samsung Galaxy SIII CTF DataPro Test at Calabasas High School

Area of lowest coverage per the Cell Newark Info App. Approximately 125 feet.
All SMS sent/received in this area went through with no delays. Number shown correlates to time of SMS, i.e. 118 = 1:18 pm





WHAT HAPPENED TO DEPUTY WOOD'S CELL PHONE?

December 11, 2013

VIA FACSIMILE & CERTIFIED MAIL

Los Angeles County Sheriff's Department
4700 Ramona Boulevard
Monterey Park, CA 91754-2169
Fax: (323) 267-6600

VIA FACSIMILE & CERTIFIED MAIL

Los Angeles County Sheriff
Malibu/Lost Hills Station
27050 Agoura Road, CA 91301-5336
Fax: (818) 880-5209

Re: Our Clients: Louise Olin, Christopher Olin, and Geoffrey Olin
Date of Incident: December 8, 2013
Location: 22000 block of Mulholland Highway in Calabasas
Case No.: 013-07095-2248-470

Dear Sir or Madam:

Please be advised that this firm represents Louise Olin with respect to the following incident (the "Incident"): Everett Olin, Jr. Mr. Olin while riding his bicycle (the "Bicycle") in a Los Angeles County Sheriff's Department vehicle (the "Sheriff's Vehicle") while on duty as a Los Angeles County deputy sheriff (the "Deputy Sheriff"). Mrs. Olin is the widow of Mr. Olin and Christopher Olin and Geoffrey Olin are his surviving sons.

Accordingly, we inform you of our representation and request that all further correspondence and communications be forwarded to this firm and that no contact be made with our clients.

I. Request for Preservation of Evidence

This letter will confirm your obligation to preserve and our demand that you preserve any and all evidentiary items relating to the Incident, including, but not limited to:

**Request for preservation of Evidence:
Including all cell phones and mobile devices**

**The Preservation Letter is 9
Pages Long.**

**Provides 8 Pages of Instructions and Descriptions
How to Preserve Electronic Data**

What Happened to the Cell Phone?

- Dec 8th: Bicyclist is killed
- Dec 12th: Preservation Letter #1
- Dec 16th: Preservation Letter #2
- Dec 18th: Deputy interviewed by County Investigators.
- Dec 23rd : County acknowledges receipt of preservation letters
- February: Phone is gone
- Wife's phone is also gone





WHAT DEPUTY
WOOD'S PHONE
WOULD HAVE
SHOWN

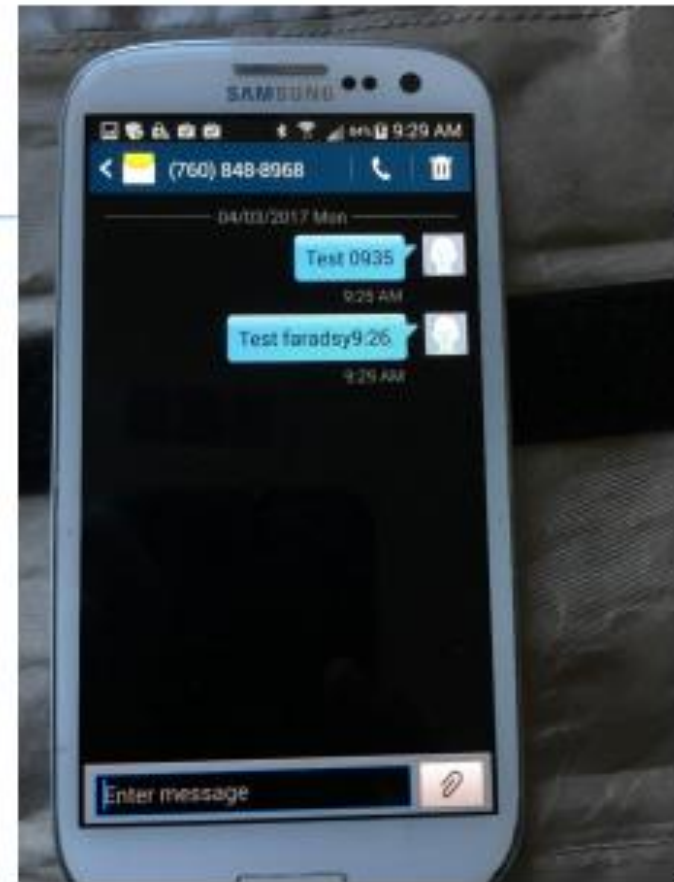


Sample phones used in tests:

1. Samsung Galaxy SIII – SCH-i535
2. Samsung SM-B311V



Sample SMS “Test faraday 9:26” sent at 9:26 a.m. with the phone inside a faraday bag. No connection to the network and status shown as “pending”.



Phone removed from faraday bag and regains connection. SMS sent at 9:29 a.m.

Contents

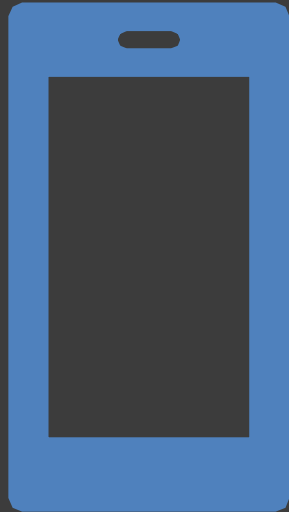
Type	Included in report	Total
 SMS Messages	3 (2 Deleted)	47 (11 Deleted)

SMS Messages (3)

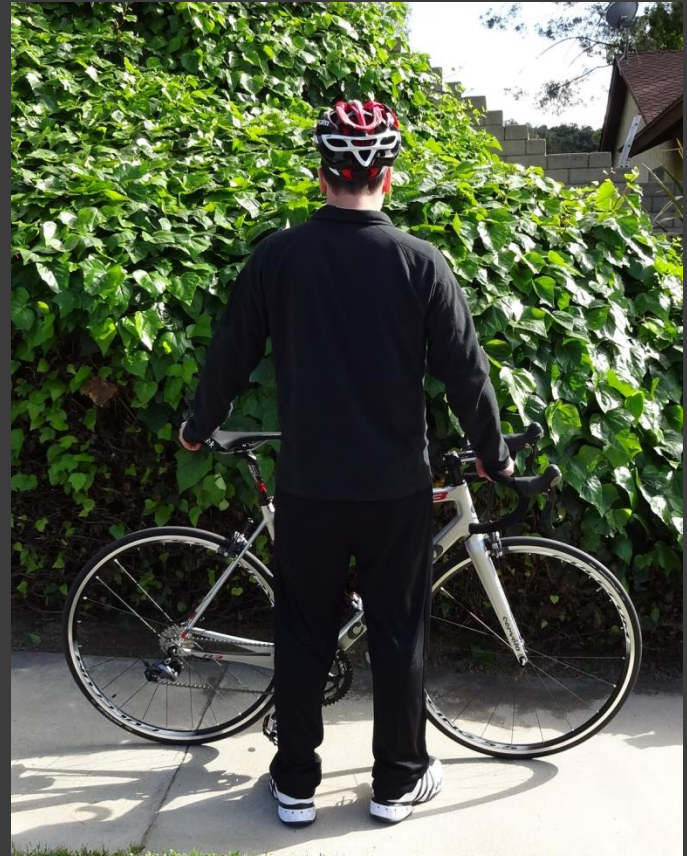
#	Folder	Party	Time	All timestamps	Status	Message	Deleted
1	Sent	To 7608488968	4/3/2017 9:29:32 AM(UTC-7)		Sent	Test faradsy9.26.	
2	Sent	To 7608488968	4/3/2017 9:28:18 AM(UTC-7)		Sent	Test faradsy9.26.	Yes
3	Drafts		4/3/2017 9:28:40 AM(UTC-7)		Unsent	Test faradsy9.26.	Yes

A Cellebrite forensic extraction of the Samsung Galaxy SIII shows the retrieval of the SMS stored in the phone:

- 9:29:40 a.m. – Original message was written and in draft mode and deleted/recovered.
- 9:28:18 a.m. – Message is shown as “sent” and deleted/recovered. This is the time the phone was in the faraday bag with no network reception.
- 9:29:32 a.m. – Message is sent when phone is removed from faraday bag and network connection is restored



DEFENSE ATTACK ON CAUSATION WITH TEXTING



16 Seconds Before Impact



8 Seconds Before Impact



Zoom: 8 Seconds Before Impact



4 Seconds Before Impact



Zoom: 4 Seconds Before Impact



2 Seconds Before Impact



PUNITIVE DAMAGES AND DISTRACTED DRIVING

OPPRESSION
FRAUD
MALICE

CIVIL CODE
3294(a)

- Defendant has consciously disregarded the safety of others and that punitive damages may be awarded where a plaintiff establishes that **“the defendant was aware of the probable dangerous consequences of his conduct,** and that he willfully and deliberately failed to avoid those consequences.” *Taylor v. Sup. Ct.* (1979) 24 Cal.3d 890, 895-96

OPPRESSION
FRAUD
MALICE

- “We suggest conscious disregard of safety as an appropriate description of the animus malus which may justify an exemplary damage award when nondeliberate injury is alleged.” *Taylor supra* at 895.
- One who voluntarily commences, and thereafter continues, to consume alcoholic beverages to the point of intoxication, knowing from the outset that he must thereafter operate a motor vehicle demonstrates ... “such a conscious and deliberate disregard of the interests of others that his conduct may be called willful or wanton.” *Id.* at 899.

***Pfeifer v. John Crane, Inc.* (2013) 220 Cal.App.4th 1270, 1300-01**

We conclude that the evidence was sufficient to show malice, that is, despicable conduct coupled with a conscious disregard for the safety of others.

JCI's compliance with OSHA regulations

JCI knew asbestos dust endangered its workers

No warnings until 1983

Knew they generated considerable asbestos dust.

Only warned customers when they asked for safety data.

The evidence thus established that JCI carried on despicable conduct with an awareness of the “probable dangerous consequences,” and “willfully fail[ed] to avoid such consequences.”

Dawes v. Superior Court (1980) 111 Cal.App.3d 82, 89:

Drinking and driving without more facts might not automatically create a probable risk of harm. Need more context.

Example: Risk created by an intoxicated driver's decision to zigzag in and out of traffic at 65 miles per hour in a crowded beach recreation area at 1:30 in the afternoon on a Sunday in June. The risk of injury to others from Mardian's conduct under the circumstances alleged was probable.

**DEPUTY WOOD'S
CONDUCT
WAS MALICIOUS**

- **KNEW HE WAS DRIVING NEAR FREEWAY
SPEED IN A SINGLE LANE**
- **KNEW HE WAS DRIVING NEXT TO A BICYCLE
LANE**
- **KNEW DISTRACTED DRIVING MADE HIM AS
DANGEROUS AS A DRUNK DRIVER**
- **THE LONGER HE WAS DISTRACTED THE
LONGER HE KNEW HE WAS INCREASING THE
RISK OF A PROBABLE CRASH**
- **NO EMERGENCY REQUIRED FOR
TEXTING/MESSAGING**
- **HE LIED ABOUT OLIN**
- **HE DESTROYED HIS PHONE**
- **CUSTOM AND HABIT OF DISTRACTED DRIVING**



PUNITIVE DAMAGES AND SURVIVAL

Need Estate as Plaintiff

An interval of time, however brief, elapses between injury to victim or to his or her property and death.

Stencel Aero Engineering Corp v. Superior Court (1976) 56 Cal.App.3d 978, 988

Grimshaw v. Ford Motor Company (1981) 119 Cal.App.3d 757, 833

May not be such thing as instantaneous death

Damage to bicycle prior to death

Blood in lungs

SURVIVAL

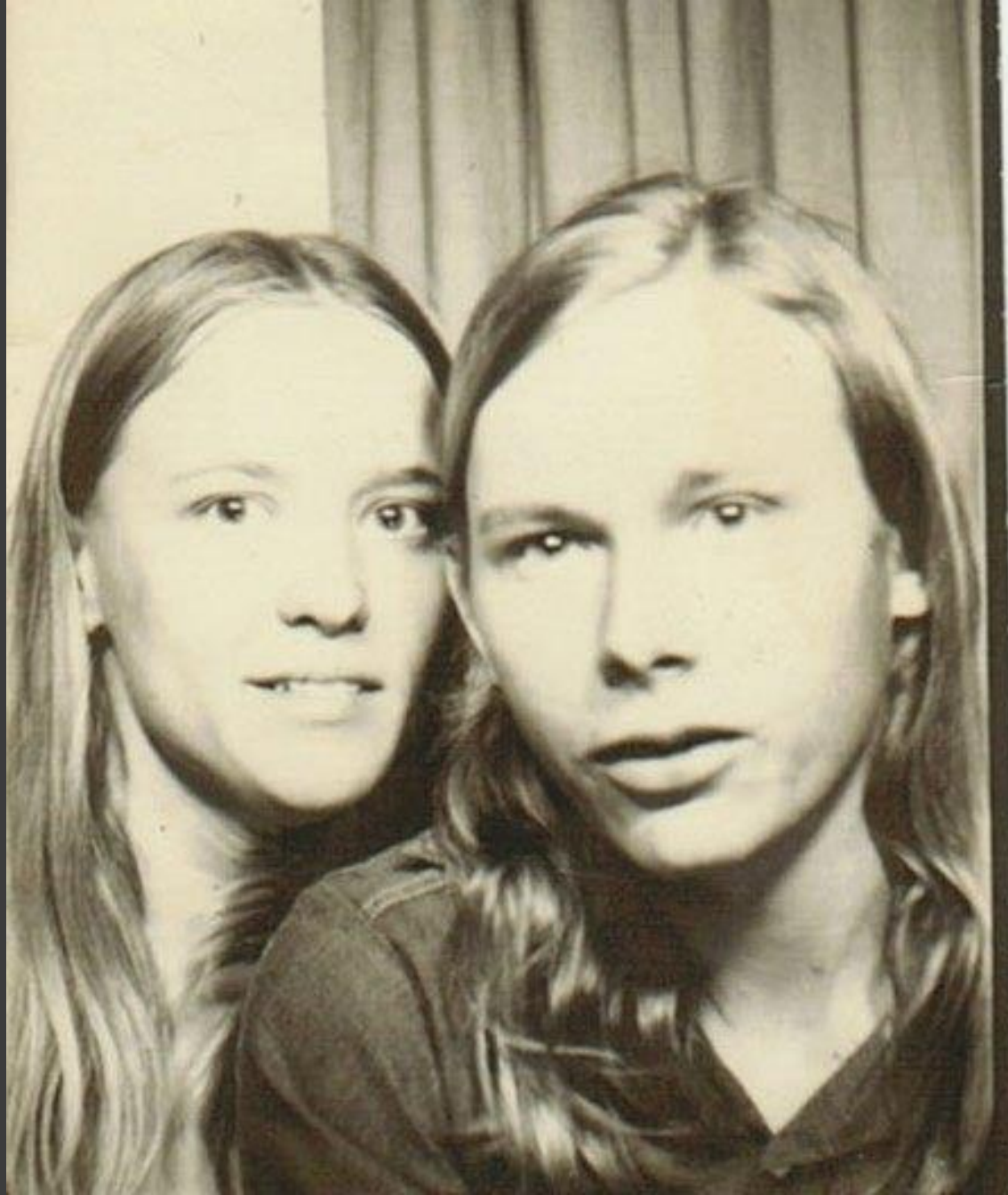


DAMAGES

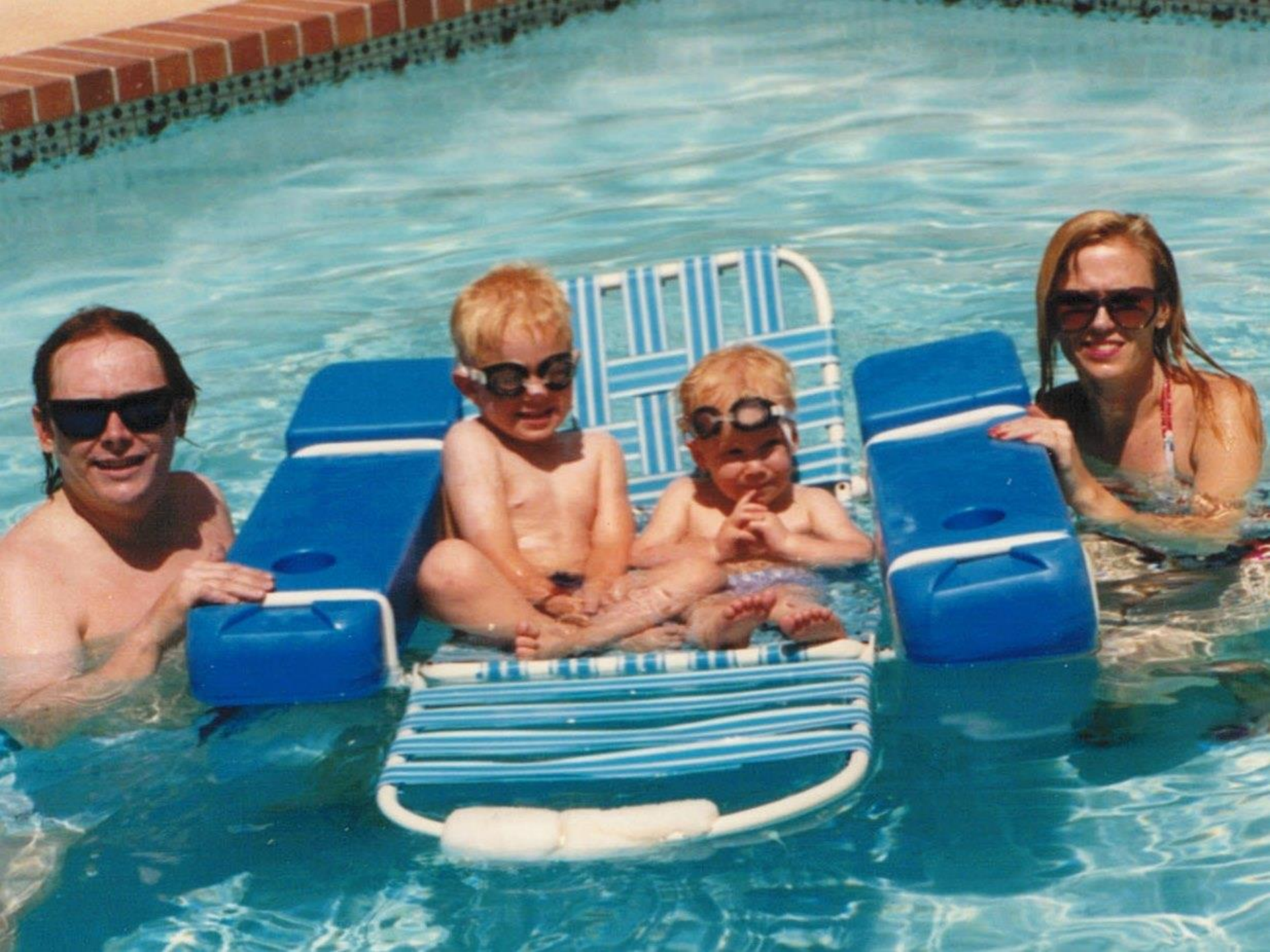


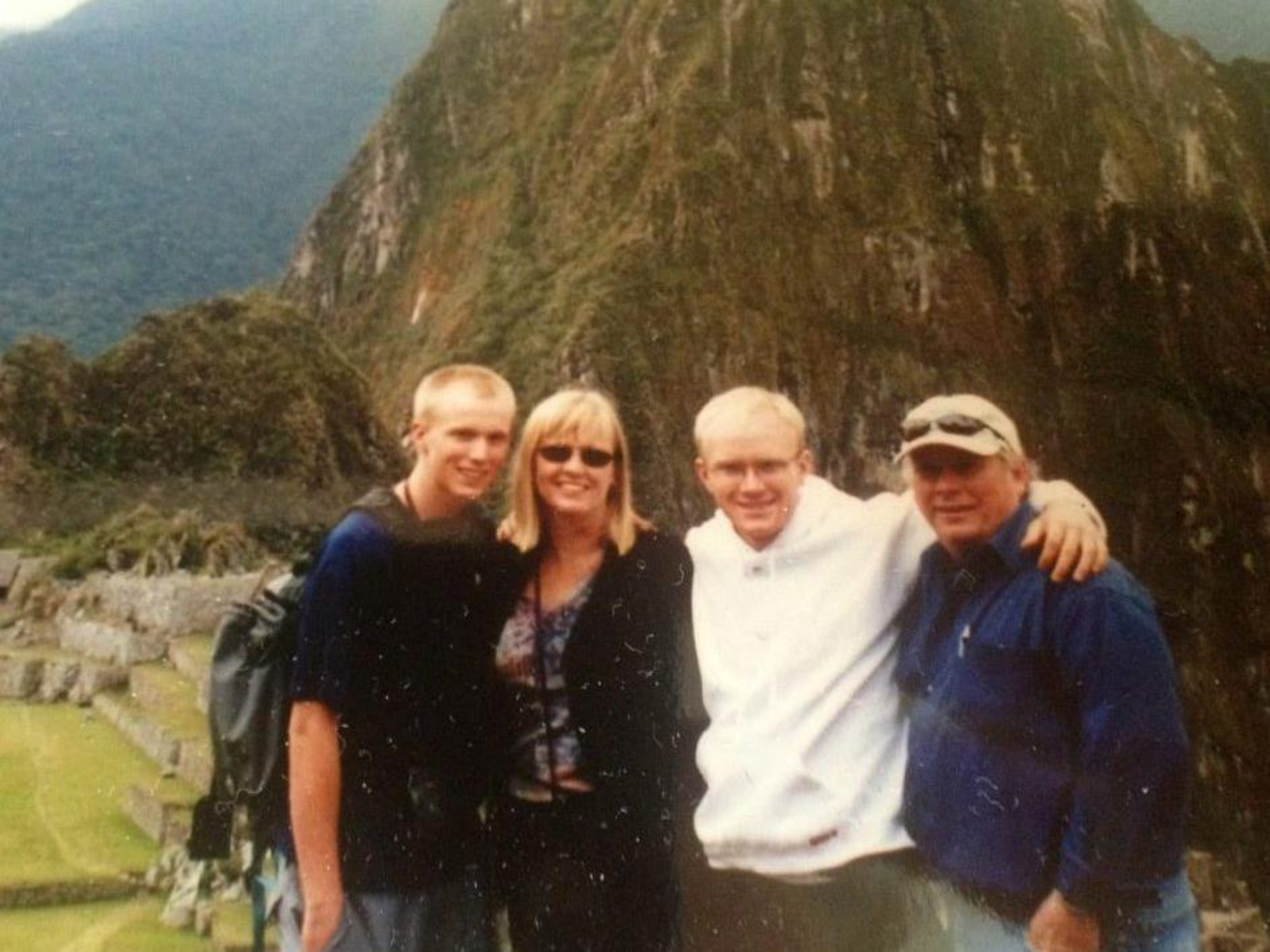














04/23/2010





Milt Olin

Joe Zaccaro

Michelle...







Vuelta a Miltoña
España 2012

Vuelta a Miltoña
España 2012

Vuelta a Miltoña
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BIKE Spain
www.Bike Spain info

10/05/2012



Milt Olin

Elizabeth



Milt Olin Foundation

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The Milt Olin Foundation is making a difference through collaboration and awareness...

The Milt Olin Foundation was founded after the death of Milt Olin a prominent Music Entertainment Attorney who in a split second lost his life due to the thoughtless distraction of an LA County Sheriff Deputy in December, 2013. The Milt Olin Foundation team, along with Milt's widow Louise Olin, is committed to making our roads safe for everyone.

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