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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

Coordination Proceeding Special Title (Rule 1550 (b)))	JUDICIAL COUNCIL COORDINATION PROCEEDING NO. 4095
FIREARMS CASE)	San Francisco Superior Court No. 303753
)	Los Angeles Superior Court No. BC210894
Including actions:)	Los Angeles Superior Court No. BC214794
People, et. al. v. Arcadia Machine & Tool, Inc., et. al.)	PROPOSED AGENDA ITEMS FOR STATUS CONFERENCE
People, et. al. v. Arcadia Machine & Tool, Inc., et. al.)	Date: October 13, 2000
)	Time: 1:30 p.m.
People, et. al. v. Arcadia Machine & Tool, Inc., et. al.)	Hon. Vincent P. DiFiglia
)	Dept: 65

Pursuant to the August 3, 2000 notice of hearing, the parties propose the following agenda items for the October 13, 2000 Status Conference:

1. Case Management Order. In connection with the July 14, 2000 Status Conference, the Plaintiffs and Defendant Manufacturers submitted alternative Proposed Case Management Orders. At the conference, the Court scheduled a hearing on the Defendants' demurrers and motions to strike, and a briefing schedule on the jurisdictional motions filed by the Trade Association Defendants. However, it did not schedule a trial date, nor dates for the exchange of experts, discovery cut-off, and other pretrial deadlines. The parties are discussing proposed deadlines and dates. By October 11, 2000 the parties will file either a joint Proposed Case

1 Management Order or alternative proposals.

2 2. Written Discovery. The parties have been meeting and conferring regarding written
3 discovery previously propounded. They are attempting to reach agreement on "core" discovery
4 that will be given priority, while other discovery is deferred.

5 3. Protective Order. The parties previously filed alternative Proposed Protective
6 Orders as well as separate briefs regarding areas of disagreement. The Court has not yet issued its
7 ruling on these matters.

8 4. Depository. The parties are engaged in continuing discussions regarding where and
9 how the documents should be produced.

10 5. Motion to Compel Jurisdictional Discovery. The Plaintiffs have filed a motion to
11 compel regarding jurisdictional discovery directed toward Sporting Arms and Ammunition
12 Manufacturers' Institute, Inc. (SAAMI). The motion is scheduled to be heard on October 13, 2000
13 at 1:30 p.m.

14 6. JusticeLink. The Court sent out a Proposed Order regarding the use of the
15 JusticeLink in this case. By letter dated, September 29, 2000, Attorney Robert Wright proposed
16 some modifications to the Order. The parties would like to discuss them at the Status Conference.

18 Respectfully Submitted,
19 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

20 Dated: October 6, 2000
21 By: Lawrence J. Koufs
22 Lawrence J. Koufs
23 Liaison Counsel for Defendant Manufacturers

24 Dated: October 6, 2000
25 By: James B. Vogts
26 James B. Vogts
27 Liaison Counsel for Defendant Manufacturers

28 [SIGNATURES CONTINUED ON NEXT PAGE]

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SEDGWICK, DETERT, MORAN & ARNOLD

Dated: October 6, 2000

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KOLETSKY, MANCINI, FELDMAN & MORROW

Dated: October 6, 2000

By: Lawrence J. Kaurer for
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MILBERG WEISS BERSHAD HYNES & LERACH LLP

DATED: 10/6, 2000

By: [Signature]
Michael J. Dowd
Liaison Counsel for Plaintiffs

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

DATED: 10/6, 2000

By: [Signature]
Robert J. Nelson
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1 PEOPLE OF THE STATE OF CALIFORNIA, et. al. v. ARCADIA MACHINE & TOOL, et. al.
Judicial Council Coordination Proceeding No. 4095
2 San Francisco Superior Court Case No. 303753
Los Angeles Superior Court Case No.: BC 210894
3 Los Angeles Superior Court Case No.: BC214794
Judge: Honorable Vincent P. DiFiglia
4 Dept.: 65

5 **PROOF OF SERVICE**

6 I declare under penalty of perjury that I am, and was at the time of service of the papers herein
referred to, over the age of eighteen years, and not a party to the action, and I am employed in the
7 County of San Diego, State of California, in which county the within-mentioned service occurred.
My business address is Luce, Forward, Hamilton & Scripps LLP, 600 West Broadway, Suite 2600,
8 San Diego, California 92101; telephone number (619) 236-1414; facsimile number (619) 645-5389.

9 On October 6, 2000, I served the foregoing document(s), bearing the title:

10 **PROPOSED AGENDA ITEMS FOR STATUS CONFERENCE**

11 on the interested parties in this action as follows:

12 by placing true copies thereof enclosed in sealed envelopes addressed as stated on the attached
mailing list.

13 by placing the original a true copy thereof enclosed in sealed envelope(s) addressed as
14 follows:

15 **SEE ATTACHED SERVICE LIST**

16 (BY MAIL SERVICE) I placed such envelope(s) for collection and to be mailed on this date
following ordinary business practices. **[AS TO ALL OTHER PARTIES]**

17 (BY PERSONAL SERVICE) I caused to be delivered such envelope by hand to the office
18 of the addressee.

19 (BY FACSIMILE) The document stated herein was transmitted by facsimile transmission
and the transmission was reported as complete and without error. A transmission report was
20 properly issued by the transmitting facsimile machine. **[AS TO LIAISON COUNSEL,
ONLY.]**

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22 envelope by hand to the office of the addressee.

23 (State) I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

24 (Federal) I declare that I am employed in the office of a member of the bar of this court at
25 whose direction the service was made.

26 Executed on October 6, 2000 at San Diego, California.

27 
Renee M. Evans

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1 PEOPLE OF THE STATE OF CALIFORNIA, et. al. v. ARCADIA MACHINE & TOOL, et. al.
Judicial Council Coordination Proceeding No. 4095
2 San Francisco Superior Court Case No. 303753
Los Angeles Superior Court Case No. BC 210894
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