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9 Co-Liaison Counsel for Defendant Manufacturers

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

12

FOR THE COUNTY OF SAN DIEGO

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14 Coordination Proceeding
Special Title (Rule 1550 (b))

) JUDICIAL COUNCIL COORDINATION
) PROCEEDING NO. 4095

15

16 FIREARMS CASE

) San Francisco Superior Court No. 303753
) Los Angeles Superior Court No. BC210894
) Los Angeles Superior Court No. BC214794

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18

19 Including actions:

) **NOTICE OF LODGMENT IN SUPPORT
) OF EX PARTE MOTION FOR ORDER
) COMPELLING PLAINTIFFS TO
) DISCLOSE (1) ACCIDENTAL
) DISCHARGE AND SUICIDE INCIDENTS
) AND (2) PLAINTIFFS' APPROVAL AND
) USE OF SPECIFIC FIREARMS**

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21 *People, et al. v. Arcadia Machine & Tool, Inc.,
et al.*

22

23 *People, et al. v. Arcadia Machine & Tool, Inc.,
et al.*

) DATE: December 19, 2000
) TIME: 8:30

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25 *People, et al. v. Arcadia Machine & Tool, Inc.,
et al.*

) DEPT: 65
) JUDGE: Honorable Vincent P. DiFiglia

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12/12/00

1 Pursuant to California Rule of Court 319 and Local Rule of Court 6.15, Defendant
2 Manufacturers hereby lodge the following correspondence, discovery responses and documents in
3 support of their Motion to Compel Plaintiffs to Disclose (1) Accidental Discharge and Suicide
4 Incidents and (2) Plaintiffs' Approval and Use of Specific Firearms.

5 1. Letter dated October 25, 2000 from James Vogts to Robert Nelson and Michael
6 Dowd.

7 2. Letter dated October 27, 2000 from Michael Dowd to Lawrence Kouns.

8 3. Letter dated November 20, 2000 from James Vogts to Jennie Lee Anderson.

9 4. Letter dated December 5, 2000 from Lawrence Kouns to Michael Dowd and Robert
10 Nelson.

11 5. Letter dated December 8, 2000 from Lawrence Kouns to Michael Dowd and Robert
12 Nelson.

13 6. City of Berkeley records produced by plaintiffs (stamped PLTF 0004952 through
14 PLTF 0004978).

15 7. Plaintiff City and County of San Francisco's Responses to Smith & Wesson Corp.'s
16 First Set of Special Interrogatories.

17 8. Plaintiffs' Consolidated Responses to Sturm, Ruger & Company, Inc.'s First Set of
18 Requests for Production of Documents.

19 9. Plaintiff City and County of San Francisco's Responses to Sturm, Ruger &
20 Company, Inc.'s First Set of Special Interrogatories.

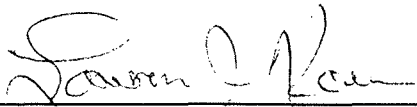
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10. Plaintiffs' Consolidated Responses to Smith & Wesson Corp.'s First Set of Requests
for Production of Documents.

Each of the above described documents are true and correct copies of the originals.

DATED: December 12, 2000 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

By: 
Lawrence J. Kouns
Co-Liaison Counsel for Defendant Manufacturers

WILDMAN, HARROLD, ALLEN & DIXON
By: 
James P. Dorf
James B. Vogts
Co-Liaison Counsel for Defendant Manufacturers

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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FOR THE COUNTY OF SAN DIEGO

13

14 Coordination Proceeding
Special Title (Rule 1550 (b))

) JUDICIAL COUNCIL COORDINATION
) PROCEEDING NO. 4095

15

16 FIREARMS CASE

) **NOTICE OF HEARING ON DEFENDANT
) MANUFACTURERS' EX PARTE MOTION
) TO COMPEL PLAINTIFFS TO
) DISCLOSE (1) ACCIDENTAL
) DISCHARGE AND SUICIDE INCIDENTS
) AND (2) PLAINTIFFS' APPROVAL AND
) USE OF SPECIFIC FIREARMS**

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19 Including actions:

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21 *People, et al. v. Arcadia Machine & Tool, Inc.,
et al.*

) San Francisco Superior Court No. 303753
) Los Angeles Superior Court No. BC210894
) Los Angeles Superior Court No. BC214794

22

23 *People, et al. v. Arcadia Machine & Tool, Inc.,
et al.*

) Date: December 19, 2000
) Time: 8:30 a.m.
) Dept.: 65

23

24 *People, et al. v. Arcadia Machine & Tool, Inc.,
et al.*

) Hon. Vincent P. DiFiglia

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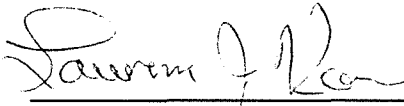
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1 TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

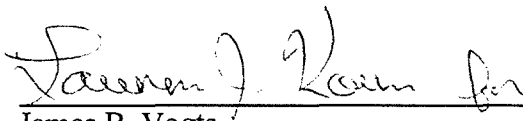
2 PLEASE TAKE NOTICE that defendant manufacturers' *ex parte* motion for an order
3 compelling plaintiffs to disclose (1) accidental discharge and suicide incidents and (2) plaintiffs'
4 approval and use of specific firearms will be heard in Department 65 of the San Diego Superior
5 Court, located at 330 West Broadway, San Diego, California, before the Honorable Vincent P.
6 DiFiglia at 8:30 a.m. on December 19, 2000. The Court requests that all attorneys be present no
7 later than 8:00 a.m. for this *ex parte* hearing.

8 The application will be based on this notice, the accompanying memorandum of points of
9 authorities, the declaration of Lawrence J. Kouns, the notice of lodgment and on any additional
10 materials filed and arguments raised at the hearing. Defendant manufacturers' *ex parte* motion and
11 supporting pleadings were served on all parties and filed with the court on December 12, 2000 in
12 accordance with the provisions of paragraph 5 of Case Management Order No. 1.

13
14 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

15
16 By: 
17 Lawrence J. Kouns
18 Co-Liaison Counsel for Defendant Manufacturers

19 WILDMAN, HARROLD, ALLEN & DIXON

20
21 By: 
22 James B. Vogts
23 Co-Liaison Counsel for Defendant Manufacturers
24
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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 November 22, 2000, I served the foregoing document(s), bearing the title:

10 **SEE ATTACHED LIST OF DOCUMENTS SERVED**

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
of the addressee. **[AS TO MICHAEL J. DOWD, ONLY]**

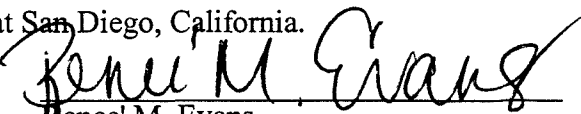
18 (BY FACSIMILE) The document stated herein was transmitted by facsimile transmission
and the transmission was reported as complete and without error. A transmission report was
19 properly issued by the transmitting facsimile machine. **[AS TO ROBERT NELSON, SUSAN
20 CALDWELL AND WAYNE WOLFF, ONLY - (WITHOUT EXHIBITS TO NOTICE
OF LODGMENT)]**

21 (BY FEDERAL EXPRESS - NEXT DAY DELIVERY) I caused to be delivered such
envelope by hand to the office of the addressee. **[AS TO ROBERT NELSON, SUSAN
22 CALDWELL AND WAYNE WOLFF, ONLY (WITH EXHIBITS TO NOTICE OF
LODGMENT ATTACHED)]**

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

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

27 Executed on November 22, 2000 at San Diego, California.

28 
Renee M. Evans

11/22/00