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6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE CITY AND COUNTY OF SAN FRANCISCO
10

11 THE PEOPLE OF THE STATE OF)	CASE NO. 303753
CALIFORNIA, et al.,)	
)	RSR WHOLESale GUNS, INC.'S
12 Plaintiffs,)	RESPONSES TO PLAINTIFFS' FIRST
)	SET OF FORM INTERROGATORIES
13 vs.)	
)	
14 ARCADIA MACHINE & TOOL, et al.,)	
)	
15 Defendants.)	
16)	

17
18 PROPOUNDING PARTY: Plaintiffs PEOPLE OF THE STATE OF CALIFORNIA
19 RESPONDING PARTY: Defendant RSR WHOLESale GUNS, INC.
20 SET NUMBER: ONE (1)

21 Defendant RSR WHOLESale GUNS, INC. (hereinafter "RSR" or
22 "Defendant") responds to Plaintiffs' First Set of Form Interrogatories as follows:

23 **FORM INTERROGATORY NO. 1.1:**

24 State the name, ADDRESS, telephone number, and relationship to you of each
25 PERSON who prepared or assisted in the preparation of the responses to these interrogatories.
26 (Do not identify anyone who simply typed or reproduced the response.)

27 **RESPONSE TO INTERROGATORY NO. 1.1:**

28 The responses to these interrogatories were prepared by outside counsel to

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12/15

1 RSR, Nicholas W. Heldt and Diane T. Gorczyca of Sedgwick, Detert, Moran & Arnold, based
2 on information provided by RSR's Senior Vice President and in-house legal counsel, Michael
3 Saporito. Mr. Saporito can be reached through Sedgwick, Detert, Moran & Arnold.

4 **INTERROGATORY NO. 3.1:**

5 Are you a corporation? If so state:

- 6 (a) the name stated in the current articles of incorporation;
7 (b) all other names used by the corporation during the past ten years and the date
8 each was used;
9 (c) the date and place of incorporation;
10 (d) the ADDRESS of the principal place of business;
11 (e) whether you are qualified to do business in California.

12 **RESPONSE TO INTERROGATORY NO. 3.1:**

13 Yes.

- 14 (a) RSR Group New York, Inc.;
15 (b) RSR Wholesale Guns, Inc., 1977-1999;
16 (c) 7/77, Rochester, New York;
17 (d) 21 Trolley Circle, Rochester, NY 14606;
18 (e) No.

19 **INTERROGATORY NO. 3.2:**

20 Are you a partnership? If so state:

- 21 (a) the current partnership name;
22 (b) all other names used by the partnership during the past ten years and the dates
23 each was used;
24 (c) whether you are a limited partnership and, if so, under the laws of what
25 jurisdiction;
26 (d) the name and ADDRESS of each general partner;
27 (e) the ADDRESS of the principal place of business.

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1 **RESPONSE TO INTERROGATORY NO. 3.2:**

2 No.

3 **INTERROGATORY NO. 3.3:**

4 Are you a joint venture? If so state:

5 (a) the current joint venture name;

6 (b) all other names used by the joint venture during the past ten years and the dates
7 each was used;

8 (c) the name and ADDRESS of each joint venturer;

9 (d) the ADDRESS of the principal place of business.

10 **RESPONSE TO INTERROGATORY NO. 3.3:**

11 No.

12 **INTERROGATORY NO. 3.4:**

13 Are you an unincorporated association? If so state:

14 (a) the current unincorporated association name;

15 (b) all other names used by the unincorporated association during the past ten years
16 and the dates each was used;

17 (c) the ADDRESS of the principal place of business.

18 **RESPONSE TO INTERROGATORY NO. 3.4:**

19 No.

20 **INTERROGATORY NO. 3.5:**

21 Have you done business under a fictitious name during the past ten years? If so, for
22 each fictitious name state:

23 (a) the name;

24 (b) the date each was used;

25 (c) the state and county of each fictitious name filing;

26 (d) the ADDRESS of the principal place of business.

27 **RESPONSE TO INTERROGATORY NO. 3.5:**

28 No.

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1 **INTERROGATORY NO. 3.6:**

2 Within the past five years has any public entity registered or licensed your businesses?

3 If so, for each license or registration:

- 4 (a) identify the license or registration;
5 (b) state the name of the public entity;
6 (c) state the dates of issuance and expiration.

7 **RESPONSE TO INTERROGATORY NO. 3.6:**

8 Yes.

- 9 (a) License to deal in handguns;
10 (b) State of New York;
11 (c) License issued 1/24/95 - expired 12/31/97;
12 License issued 2/23/98 - expires 12/31/01.

- 13
14 (a) Federal Firearms License;
15 (b) BATF
16 (c) License issued 1995 - expired 8/1/98;
17 License issued 1998 - expires 8/1/01.

- 18
19 (a) Export Registration;
20 (b) U.S. Department of State;
21 (c) Registration issued 1995 - expires 3/00.

- 22
23 (a) Burglar alarm permit;
24 (b) Town of Gates, New York;
25 (c) Permit issued in April of each year and expires on 4/30 of the following year.
26 Most recent permit issued in 4/99 - expires 4/30/00.

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1 **INTERROGATORY NO. 4.1:**

2 At the time of the INCIDENT, was there in effect any policy of insurance through
3 which you were or might be insured in any manner (for example, primary, pro-rata, or excess
4 liability coverage or medical expense coverage) for the damages, claims, or actions that have
5 arisen out of the INCIDENT? If so, for each policy state:

6 (a) the kind of coverage;

7 (b) the name and ADDRESS of the insurance company;

8 (c) the name, ADDRESS, and telephone number of each named insured;

9 (d) the policy number;

10 (e) the limits of coverage for each type of coverage contained in the policy;

11 (f) whether any reservation of rights or controversy or coverage disputes exists
12 between you and the insurance company;

13 (g) the name, ADDRESS, and telephone number of the custodian of the policy.

14 **RESPONSE TO INTERROGATORY NO. 4.1:**

15 RSR responds that it is insured under various commercial general liability
16 policies with United Capitol Insurance Company, National Union Fire Insurance Company,
17 Scottsdale Insurance Company, and other potential insurers. Investigation is continuing, but,
18 to date, Scottsdale has denied coverage and United Capitol and National Union/AIG are
19 defending RSR in this action under a full reservation of rights.

20 **INTERROGATORY NO. 4.2:**

21 Are you self-insured under any statute for the damages, claims, or actions that have
22 arisen out of the INCIDENT? If so, specify the statute.

23 **RESPONSE TO INTERROGATORY NO. 4.2:**

24 No.

25 **INTERROGATORY NO. 15.1:**

26 Identify each denial of a material allegation and each special or affirmative defense in
27 your pleadings and for each:

28 (a) state all facts upon which you base the denial or special or affirmative defense;

1 (b) state the names, ADDRESSES, and telephone numbers of all PERSONS who
2 have knowledge of those facts;


3 (c) identify all DOCUMENTS and other tangible things which support your denial
4 or special or affirmative defense, and state the name, ADDRESS, and telephone number of
5 the PERSON who has each DOCUMENT.

6 **RESPONSE TO INTERROGATORY NO. 15.1:**

7 Not applicable. A Demurrer and Motion to Strike have been filed but not yet heard or
8 decided and Defendant has not yet answered Plaintiff's First Amended Complaint in this
9 action.

10
11 DATED: December 15, 1999

SEDGWICK, DETERT, MORAN & ARNOLD

12
13
14 By 
15 NICHOLAS W. HELDT
DIANE T. GORCZYCA
16 Attorneys for Defendant
RSR WHOLESAL GUNS, INC.

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VERIFICATION

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I, Michael Saporito, declare:

I am Senior Vice President of RSR Wholesale Guns, Inc., a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for this reason.

I have read the foregoing Responses to Plaintiffs' First Set of Form Interrogatories and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe them to be true.

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

Executed at Winter Park, Florida on the 15 th day of December, 1999.



Michael Saporito

People, et al. v. Arcadia Machine & Tool, et al.
San Francisco Superior Court, No.303753

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1 The People of the State of California, et al. v. Arcadia Machine & Tool, Inc., et al.
2 San Francisco Superior Court; No. 303753

3 **PROOF OF SERVICE**

4 I am a resident of the State of California, over the age of eighteen years, and not a
5 party to the within action. My business address is Sedgwick, Detert, Moran & Arnold, One
6 Embarcadero Center, 16th Floor, San Francisco, California 94111-3628. On December 15,
7 1999, I served the within documents:

8 RSR WHOLESALE GUNS, INC.'S RESPONSES TO PLAINTIFF'S FIRST
9 SET OF FORM INTERROGATORIES

- 10 by transmitting via facsimile the document(s) listed above to the fax number(s)
11 set forth below on this date before 5:00 p.m.
- 12 by placing the document(s) listed above in a sealed envelope with postage thereon
13 fully prepaid, in the United States mail at San Francisco, California addressed as
14 set forth below.
- 15 by causing personal delivery by _____ of the document(s) listed above to
16 the person(s) at the address(es) set forth below.
- 17 by personally delivering the document(s) listed above to the person(s) at the
18 address(es) set forth below.
- 19 by overnight courier of the document(s) listed above to the person(s) at the
20 address(es) set forth below.

21 *See attached list*

22 I declare under penalty of perjury under the laws of the State of California that the
23 above is true and correct.

24 Executed on December 15, 1999, at San Francisco, California.

25 
26 _____
27 Kathleen Dorio

28 SEDGWICK,
DETERT, MORAN
& ARNOLD

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