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Colt's Manufacturing Company, Inc.
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6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **IN AND FOR THE COUNTY OF SAN FRANCISCO**
8 **UNLIMITED CIVIL JURISDICTION**
9

10 THE PEOPLE OF THE STATE OF

11 CALIFORNIA, et al.,

12 Plaintiffs,

13 v.

14 ARCADIA MACHINE & TOOL, et al.,

15 Defendants.

Case No.: 303753

**SUPPLEMENTAL RESPONSE OF
DEFENDANT COLT'S
MANUFACTURING COMPANY TO
PLAINTIFFS' SPECIAL
INTERROGATORIES NOS. 1, 2, 6, 11,
12, 13, 15, 18, 49 AND 56**

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17 PROPOUNDING PARTY: Plaintiffs The People of the State of California, et al.

18 RESPONDING PARTY: Defendant Colt's Manufacturing Company, Inc..

19 SET NUMBER: One (1) (Special Interrogatories)
20

21 Pursuant to California Code of Civil Procedure Section 2030, Defendant Colt's
22 Manufacturing Company, Inc. ("Colt") files this supplemental response to Interrogatories Nos.
23 1, 2, 6, 11, 12, 13, 15, 18, 49 and 56 of plaintiffs' first set of special interrogatories.
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25 **I. GENERAL OBJECTIONS**

26 Colt makes the following general objections to plaintiffs' interrogatories. The
27 general objections set forth below are incorporated into each of Colt's objections to plaintiffs'
28 specific interrogatories unless otherwise specifically indicated.

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A. Previous Objections Incorporated

Colt hereby incorporates by reference the general objections set forth in its original responses to Plaintiffs' Special Interrogatories, served on November 8, 1999, as if set forth fully herein.

2. **Colt's Supplemental Responses are Made Pursuant to Agreements Between the Parties**

Colt is serving these supplemental responses pursuant to what it understood to be the agreements reached between the parties and in the spirit of advancing discovery among the parties through voluntary cooperation. Colt expects plaintiffs to join in this cooperative effort. Additionally, Colt states its offers to make available documents that relate to the subject matter of this litigation and plaintiffs' interrogatories are based on a reasonable review of its documents and files, consistent with Colt's obligations under the California Code of Civil Procedure.

C. Document Depository

Dozens of municipalities and other entities have commenced numerous lawsuits across the country against Colt, other firearm manufacturers, and other entities. Requiring Colt to produce documents separately in response to each and every document request and interrogatory in each and every one of these pending cases would place an enormous burden upon Colt.

Therefore, Colt will be completing shortly the creation of a document depository in Hartford, Connecticut (the "depository"). Colt is making a good faith attempt, consistent with its obligations under the California Code of Civil Procedure, to seek out and produce to the depository documents that may be relevant in this litigation. Colt will continue to supplement the depository, as necessary, as relevant issues in this litigation are identified and/or newly discovered documents become available. The depository will contain a reading room to be used

1 to inspect the documents. The documents at the depository will be kept as they are maintained in
2 the ordinary course of business. A file-level index will be available to assist those inspecting the
3 documents. It is anticipated that copies of requests for large volumes of documents can be filled
4 within one week to ten days. Reasonable arrangements to access the depository may be made by
5 contacting counsel for Colt.
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7 **II. SUPPLEMENTAL RESPONSES TO SPECIFIC INTERROGATORIES**

8 **SPECIAL INTERROGATORY NO. 1:**

9 IDENTIFY ALL of YOUR subsidiary, parent and AFFILIATED ENTITIES.

10 **ORIGINAL RESPONSE:**

11 Colt objects to this interrogatory to the extent it seeks information dated or
12 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
13 the grounds that it is vague, ambiguous and overly broad (e.g., in its use of the terms "affiliated
14 entities," which is broadly and ambiguously defined by plaintiffs) and seeks information that is
15 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence
16 because, among other things, it fails to limit itself to information that has some potential bearing
17 on the issues in this case.
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19 **SUPPLEMENTAL RESPONSE:**

20 Subject to and without waiving its objections and subject to the agreements
21 reached among counsel, Colt states that its parent entity is New Colt Holding Corp. In addition
22 to Colt's Manufacturing Company, Inc. ("Colt"), New Colt Holding is also the parent corporation
23 of Colt Rifles, Inc., and Saco Defense Corp. Colt further states that organizational charts for
24 Colt are being produced to the depository and are available to the plaintiffs for inspection and
25 copying upon request. Colt designates these documents as responsive to this interrogatory
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1 pursuant to California Code of Civil Procedure Section 2030 because the burden of deriving the
2 requested information is substantially the same for the plaintiffs as it would be for Colt.

3 **SPECIAL INTERROGATORY NO. 2:**

4 IDENTIFY ALL of YOUR directors, officers, and other EMPLOYEES in a
5 managerial or supervisory position, excluding ANY clerical EMPLOYEES or support staff.
6

7 **ORIGINAL RESPONSE:**

8 Colt objects to this interrogatory to the extent it seeks information dated or
9 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
10 the grounds that it is vague and ambiguous (e.g., in its use of the terms "managerial" and
11 "supervisory" in the context of this interrogatory), unduly burdensome and overly broad (e.g.,
12 in its use of the term "employees," which is defined to include "accountants, agents,
13 representatives, attorneys, contractors, subcontractors, advisors, servants, temporary personnel,
14 outside salespersons, and consultants") and seeks information that is neither relevant nor
15 reasonably calculated to lead to the discovery of admissible evidence because, among other
16 things, it fails to limit itself to information that has some potential bearing on the issues in this
17 case. Colt further objects to this interrogatory to the extent it seeks information that is
18 confidential, and/or privileged or protected. (See paragraph I.B., supra.)
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20 **SUPPLEMENTAL RESPONSE:**

21 Subject to and without waiving its objections and subject to the agreements
22 reached among counsel, Colt states that the following is a list of the current officers and
23 executives:
24

25 President and CEO: William M. Keys

26
27 Acting CFO and Acting
28

1 Chief Operating Officer: Thomas F. Siegel, Jr.

2

3 Vice Presidents: Elizabeth K. Lavach

4 Eugene P. Centauro

5

6 Vice President, General Counsel

7 and Secretary: Carlton S. Chen

8

9 Colt further states that based on a good faith review of its available documents,

10 the following is a list of the executives formerly employed by Colt since March 22, 1990:

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12 President: Steven Silwa

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Ronald Stewart

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John Jastrem

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Ronald Whittaker

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Ronald Stillwell

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Richard Gamble

18

Gary French

19

Edward Warner

20

Dave Eaton

21

Paul Benke

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23 VP of Engineering: Andrew Brignoli

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Marc Fontaine

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Buck Hendrickson

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Doug Overbury

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Richard Costello

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Art Holben

Bert Karens

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Richard Brown
Robert Fremont
VP of Finance: Thomas Gilboy
(Controller) Robert Wilson
John Holjes
Gary French
Haydon Stone
VP of Mfg.: Buck Hendrickson
Marc Fontaine
Carlos Cardoso
Kenneth Plant
VP of Marketing: Thomas J. Kilby
(and/or sales) Michael P. Reissig
Amaro Goncalves
Jeffrey Crute
Ronald Stilwell
Jan Maladek
Robert Gurarsi
Robert Roy

SPECIAL INTERROGATORY NO. 6:

IDENTIFY ANY and ALL PERSON(S) and/or ENTITIES that have had an ownership interest in YOU and state the nature of the relationship between YOU and each individual or ENTITY.

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2 **ORIGINAL RESPONSE:**

3 Colt objects to this interrogatory to the extent it seeks information dated or
4 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
5 the grounds that it is overly broad and unduly burdensome (e.g., in its use of the term "person(s)"
6 in the context of this interrogatory, which plaintiffs define as including entities not affiliated with
7 Colt, including "private corporations, governmental entities, partnerships, associations, and joint
8 ventures"), and seeks information that is neither relevant nor reasonably calculated to lead to the
9 discovery of admissible evidence because, among other things, it fails to limit itself to
10 information that has some potential bearing on the issues in this case. Colt further objects to this
11 interrogatory to the extent it seeks information that is confidential, and/or privileged or protected.
12 (See paragraph I.B., supra.)
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14 **SUPPLEMENTAL RESPONSE:**

15 Colt refers plaintiffs to its supplemental response to Interrogatory No. 1 and
16 hereby incorporates its response to Interrogatory No. 1 as if set forth fully herein.
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19 **SPECIAL INTERROGATORY NO. 11:**

20
21 IDENTIFY ALL models and the quantity of each FIREARM DISTRIBUTED by
22 YOU.
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24 **ORIGINAL RESPONSE:**

25 Colt objects to this interrogatory to the extent it seeks information pertaining to
26 COLT brand firearms in commerce before September 16, 1994 and/or information dated or
27 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
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1 the grounds that it is overly broad, not limited in time or scope, unduly burdensome, and seeks
2 information that is neither relevant nor reasonably calculated to lead to the discovery of
3 admissible evidence because, among other things, it fails to limit itself to information that has
4 some potential bearing on the issues in this case. Colt also objects to this interrogatory as vague
5 and ambiguous in its use of the term "distributed," which plaintiffs circularly define as "sold,
6 distributed or shipped." Colt also objects to this interrogatory to the extent that it is not limited
7 to the national, commercial firearms market and seeks documents related to, inter alia, sales
8 and/or distribution to military, law enforcement, or international entities. (See paragraph I.F.,
9 supra.) Colt further objects to this interrogatory to the extent it seeks information that is
10 confidential, and/or privileged or protected. (See paragraph I.B., supra.)

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12 **SUPPLEMENTAL RESPONSE:**

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14 Subject to and without waiving its objections and subject to the agreements
15 reached among counsel, Colt states that documents that show Colt's models of firearms and the
16 quantities of each firearm distributed for sale to the public, if available, are being produced to the
17 depository and are available to the plaintiffs for inspection and copying upon request. Colt
18 designates these documents as responsive to this interrogatory pursuant to California Code of
19 Civil Procedure Section 2030 because the burden of deriving the requested information is
20 substantially the same for the plaintiffs as it would be for Colt.

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22 **SPECIAL INTERROGATORY NO. 12:**

23
24 IDENTIFY ALL models and the quantity of each FIREARM
25 MANUFACTURED by YOU that were or are sold directly to CONSUMERS in the United
26 States.
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2 **ORIGINAL RESPONSE:**

3 Colt objects to this interrogatory to the extent it seeks information pertaining to
4 COLT brand firearms in commerce before September 16, 1994 and/or information dated or
5 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
6 the grounds that it is overly broad, not limited in time or scope, and seeks information that is
7 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence
8 because, among other things, it fails to limit itself to information that has some potential bearing
9 on the issues in this case. Colt also objects to this interrogatory to the extent that it is not limited
10 to the national, commercial firearms market and seeks documents related to, inter alia, sales to
11 military, law enforcement, or international entities. (See paragraph I.F., supra.) Colt also objects
12 to this interrogatory as duplicative of Request No. 11. Colt further objects to this interrogatory to
13 the extent it seeks information that is confidential, and/or privileged or protected. (See
14 paragraph I.B., supra.)
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17 **SUPPLEMENTAL RESPONSE:**

18 Subject to and without waiving its objections and subject to the agreements
19 reached among counsel, Colt states that, with the exception of a small number of direct sales to
20 employees, Colt sells its firearms only to authorized distributors. Documents that show Colt's
21 models of firearms and the quantities of each firearm distributed for sale to the public, if
22 available, are being produced to the depository and are available to the plaintiffs for inspection
23 and copying upon request. Colt designates these documents as responsive to this interrogatory
24 pursuant to California Code of Civil Procedure Section 2030 because the burden of deriving the
25 requested information is substantially the same for the plaintiffs as it would be for Colt.
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SPECIAL INTERROGATORY NO. 13:

IDENTIFY ALL DEALERS and DISTRIBUTORS to whom YOU sell or have sold FIREARMS, including the model and quantity of each FIREARM sold to each such DEALER and DISTRIBUTOR.

ORIGINAL RESPONSE:

Colt objects to this interrogatory to the extent it seeks information pertaining to COLT brand firearms in commerce before September 16, 1994 and/or information dated or created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because, among other things, it fails to limit itself to information that has some potential bearing on the issues in this case. Colt also objects to this interrogatory to the extent that it is not limited to the national, commercial firearms market and seeks documents related to, inter alia, sales to military, law enforcement, or international entities. (See paragraph I.F., supra.) Colt further objects to this interrogatory to the extent it seeks information that is confidential, and/or privileged or protected. (See paragraph I.B., supra.)

SUPPLEMENTAL RESPONSE:

Subject to and without waiving its objections and subject to the agreements reached among counsel, Colt states that documents that show Colt's models of firearms and the quantities of each firearm sold to dealers and distributors, if available, are being produced to the depository and are available to the plaintiffs for inspection and copying upon request. Colt designates these documents as responsive to this interrogatory pursuant to California Code of

1 Civil Procedure Section 2030 because the burden of deriving the requested information is
2 substantially the same for the plaintiffs as it would be for Colt.

3 **SPECIAL INTERROGATORY NO. 15:**
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5 IDENTIFY ALL FIREARM SAFETY FEATURES incorporated into ANY
6 model of FIREARM MANUFACTURED, DISTRIBUTED or sold by or for YOU.
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8 **ORIGINAL RESPONSE:**
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10 Colt objects to this interrogatory to the extent it seeks information pertaining to
11 COLT brand firearms in commerce before September 16, 1994 and/or information dated or
12 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
13 the grounds that it is overly broad, unduly burdensome, and seeks information that is neither
14 relevant nor reasonably calculated to lead to the discovery of admissible evidence because,
15 among other things, it fails to limit itself to information that has some potential bearing on the
16 issues in this case. Colt further objects to this interrogatory to the extent it seeks information that
17 is confidential, and/or privileged or protected. (See paragraph I.B., supra.) Colt also objects to
18 this interrogatory as vague and ambiguous in its use of the term "distributed," which plaintiffs
19 circularly define as "sold, distributed or shipped." Colt also objects to this interrogatory to the
20 extent that it is not limited to the national, commercial firearms market and seeks documents
21 related to, inter alia, sales and/or distribution to military, law enforcement, or international
22 entities. (See paragraph I.F., supra.)
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24 **SUPPLEMENTAL RESPONSE:**
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26 Subject to and without waiving its objections and subject to the agreements
27 reached among counsel, Colt states that copies of documents that discuss or refer to safety
28 devices and safety features on COLT brand firearms are being produced to the depository and

1 will be available to the plaintiffs for inspection and copying upon request. The documents
2 produced to the depository will include product warnings given by Colt, documents discussing
3 marketing, advertising, sales, and distribution strategy for the sale of COLT firearms and safety
4 devices, documents discussing research, development, testing, marketing, and distribution of
5 firearm safety devices, and advertisements. Colt designates these documents as responsive to
6 this interrogatory pursuant to California Code of Civil Procedure Section 2030 because the
7 burden of deriving the requested information is substantially the same for the plaintiffs as it
8 would be for Colt.

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10 **SPECIAL INTERROGATORY NO. 18:**

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12 IDENTIFY ALL AGREEMENTS among ANY two or more FIREARMS
13 MANUFACTURERS or DISTRIBUTORS, RELATING to ANY FIREARM SAFETY
14 FEATURE.

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16 **ORIGINAL RESPONSE:**

17 Colt objects to this interrogatory to the extent it seeks information pertaining to
18 COLT brand firearms in commerce before September 16, 1994 and/or information dated or
19 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
20 the grounds that it is overly broad, unduly burdensome, and seeks information that is neither
21 relevant nor reasonably calculated to lead to the discovery of admissible evidence because,
22 among other things, it fails to limit itself to information that has some potential bearing on the
23 issues in this case. Colt objects to this interrogatory as vague and ambiguous (e.g., in its use of
24 the term "firearm safety feature"; see Response to Special Interrogatory No. 17, supra). Colt
25 further objects to this interrogatory to the extent it seeks information that is confidential, and/or
26 privileged or protected. (See paragraph I.B., supra.)
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1 **SUPPLEMENTAL RESPONSE:**

2 Subject to and without waiving its objections and subject to the agreements
3 reached among counsel, Colt states that it has not entered any agreements, and has no copies of
4 any agreements, between Colt and any other firearm manufacturer that discuss or refer to a
5 decision or agreement between such manufacturers to refrain from pursuing, developing or
6 implementing any firearm safety device or feature. Colt further states that documents that
7 discuss or refer to safety devices and safety features on COLT firearms are being produced to the
8 depository and will be available to the plaintiffs for inspection and copying upon request. Colt
9 designates these documents as responsive to this interrogatory pursuant to California Code of
10 Civil Procedure Section 2030 because the burden of deriving the requested information is
11 substantially the same for the plaintiffs as it would be for Colt.
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13 **SPECIAL INTERROGATORY NO. 49:**

14
15 IDENTIFY ALL of YOUR FIREARMS that have been the subject of a TRACE.
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17 **ORIGINAL RESPONSE:**

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19 Colt objects to this interrogatory to the extent it seeks information pertaining to
20 COLT brand firearms in commerce before September 16, 1994 and/or information dated or
21 created before March 22, 1990. (See paragraph I.D., supra.) Colt objects to this interrogatory on
22 the grounds that it is overly broad, not limited in time or scope, unduly burdensome, and seeks
23 information that is neither relevant nor reasonably calculated to lead to the discovery of
24 admissible evidence because, among other things, it fails to limit itself to information that has
25 some potential bearing on the issues in this case. For example, firearms, including Colt firearms,
26 are traced for any number of reasons — not known to Colt — other than criminal use of a
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1 firearm. Colt further objects to this interrogatory to the extent it seeks information that is
2 confidential, and/or privileged or protected. (See paragraph I.B., supra.)

3 **SUPPLEMENTAL RESPONSE:**

4 Subject to and without waiving its objections and subject to the agreements
5 reached among counsel, Colt states that documents that show COLT brand firearms that have
6 been the subject of a trace request by the ATF or California law enforcement agencies are being
7 produced to the depository and are available to the plaintiffs for inspection and copying upon
8 request. Colt designates these documents as responsive to this interrogatory pursuant to
9 California Code of Civil Procedure Section 2030 because the burden of deriving the requested
10 information is substantially the same for the plaintiffs as it would be for Colt.

11 **SPECIAL INTERROGATORY NO. 56:**

12 IDENTIFY ALL requirements that a PERSON or ENTITY must satisfy in order
13 to purchase a FIREARM from YOU.

14 **ORIGINAL RESPONSE:**

15 Colt objects to this interrogatory to the extent it seeks information pertaining to
16 COLT brand firearms in commerce before September 16, 1994 and/or information dated or
17 created before March 22, 1990. (See paragraph I.D., supra.) Colt also objects to this
18 interrogatory to the extent that it is not limited to the national, commercial firearms market and
19 seeks information related to, inter alia, sales to military, law enforcement, or international
20 entities. (See paragraph I.F., supra.)

21 **SUPPLEMENTAL RESPONSE:**


22 Subject to and without waiving its objections and subject to the agreements
23 reached among counsel, Colt states that, with the exception of a small number of direct sales to
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1 employees, Colt sells its firearms only to authorized distributors. Copies of documents that
2 discuss or refer to the requirements that must be met to become a Colt distributor are being
3 produced to the depository and will be available to the plaintiffs for inspection and copying upon
4 request. Additionally, documents that discuss or refer to employee sales are being produced to
5 the depository and will be available to the plaintiffs for inspection and copying upon request.
6 Colt designates these documents as responsive to this interrogatory pursuant to California Code
7 of Civil Procedure Section 2030 because the burden of deriving the requested information is
8 substantially the same for the plaintiffs as it would be for Colt.
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Dated: February 15, 2000

THE ST. PETER LAW GROUP

By 
Attorneys for Defendant
Colt's Manufacturing Company, Inc.

lc: colts supp rsp to spec ints 1

VERIFICATION TO FOLLOW

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CERTIFICATE OF SERVICE

I, Margaret R. Peterson, declare:

I am employed in the City and County of San Francisco; I am over the age of 18 years and not a party to the within action; my business address is Three Embarcadero Center, Suite 2900, San Francisco, CA 94111. I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On 2-15-00, I served the following documents(s):

Defendant Colt's Manufacturing Company's Supplemental Response to Plaintiffs' Special Interrogatories, Set 1

in the following manner:

- MAIL by placing a true copy(ies) thereof in a sealed envelope(s) in the outgoing mail tray located in my office for deposit in the United States mail, with postage fully prepared, addressed as shown below. I am readily familiar with the business practice at my place of business for collection and processing of outgoing mail with the U.S. Postal Service. Mail so collected and processed is deposited with the U.S. Postal Service that same day in the ordinary course of business.
- PERSONAL SERVICE: by requesting a messenger service to hand delivery the same in an envelope(s) addressed as shown below.

See Attached List

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on 2-15-00 at San Francisco, California.

Margaret R. Peterson
Margaret R. Peterson

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