

File

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F I L E D
STEPHEN THUNBERG
Clerk of the Superior Court

MAR 26 2002

By: M. RADEMAKER, Deputy

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
Including actions:) Los Angeles Superior Court No. BC210894
People, et. al. v. Arcadia Machine & Tool, Inc., et. al.) [REDACTED] CASE MANAGEMENT ORDER NO. 5
People, et. al. v. Arcadia Machine & Tool, Inc., et. al.) Hon. Vincent P. DiFiglia
People, et. al. v. Arcadia Machine & Tool, Inc., et. al.) Dept: 65

A. Core Document Production

May 17, 2002 Final deadline for plaintiffs Los Angeles City and Los Angeles County to produce documents under the March 26, 2001 order pursuant to the Stipulation and Order Regarding City of Los Angeles and County of Los Angeles Production of Firearms Incident Documents.

B. Discovery Motions

All motions to resolve discovery-related issues which may affect more than one party shall be brought simultaneously against all affected parties.

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3/26/2002

[REDACTED] CASE MANAGEMENT ORDER NO. 5

- 1 **C. Fact Discovery**
- 2
- 3 August 9, 2002 Deadline to complete all fact discovery, including depositions. However, if a party subsequently discloses new fact witnesses, the
- 4 opposing party shall have the right to take their depositions.
- 5 December 6, 2002 Deadline for parties to provide final fact witness lists, identifying
- 6 information and a brief statement of the nature of their expected
- 7 testimony. Any witness identified on the list who was not formally
- 8 identified before the discovery deadline on May 31, 2002, can be
- 9 **D. Expert Witnesses** deposed by the party or parties receiving this final fact witness list.
- 10 August 9, 2002 First exchange of expert witness information pursuant to C.C.P. §
- 11 2034. For those experts who will create or rely on statistical or
- 12 computerized models, the parties must also produce those statistical or
- 13 computer models and any related database on appropriate electronic
- 14 media to allow the opposing party to run, replicate or otherwise
- 15 interpret the model or database, together with all codes, data or other
- 16 information required to run, replicate or otherwise interpret the model
- 17 or database.
- 18 August 16, 2002 First day to take expert witness depositions.
- 19 September 30, 2002 Second exchange of expert information pursuant to C.C.P. § 2034(h),
- 20 according to the same protocol as pertains to the first exchange of
- 21 experts.
- 22 November 25, 2002 Deadline to complete expert witness depositions.
- 23 **E. Dispositive Motions**
- 24 December 16, 2002 Deadline to file dispositive motions, such as motions for summary
- 25 judgment/adjudication.
- 26 January 13, 2003 Deadline to file oppositions to dispositive motions.
- 27 February 3, 2003 Deadline to file replies to oppositions to dispositive motions.
- 28 February 18, 2003 Last day for hearing on dispositive motions.
- 29 **F. Documents**
- 30 March 7, 2003 Deadline to exchange a list of all documents and other items to be
- 31 offered as exhibits at trial, other than solely for impeachment or
- 32 rebuttal.
- 33 ///
- 34 ///

1 **G. Trial**

2 March 21, 2003 Trial readiness conference

3 April 25, 2003 Trial

ORDER

The foregoing is hereby made an Order of this Court

7 Dated: _____

8 Vincent P. DiFiglia
Judge of the Superior Court

APPROVED AS TO FORM AND CONTENT:

11 DATED: March 22, 2002 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

12 By: Lawrence J. Romik

13 Lawrence J. Romik
Co-Liaison Counsel for Defendant
Manufacturers

15 DATED: March 21, 2002 KOLETSKY, MANCINI, FELDMAN & MORROW

16 By: Susan Caldwell

17 Susan Caldwell
Co-Liaison Counsel for Defendant
Trade Associations

19 DATED: March ____, 2002 SEDGWICK, DETERT, MORAN & ARNOLD

20 By: _____

21 Wayne A. Wolff
Co-Liaison Counsel for Defendant
Distributors

23 DATED: March ____, 2002 MILBERG WEISS BERSHARD HYNES & LERACH LLP

24 By: _____

25 Michael J. Dowd
Co-Liaison Counsel for Plaintiffs

1744001

- 1 **G. Trial**
- 2 March 21, 2003 Trial readiness conference
- 3 April 25, 2003 Trial

ORDER

The foregoing is hereby made an Order of this Court.

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 Judge of the Superior Court

APPROVED AS TO FORM AND CONTENT:

11 DATED: March ____, 2002 **LUCE, FORWARD, HAMILTON & SCRIPPS LLP**

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

15 DATED: March ____, 2002 **KOLETSKY, MANCINI, FELDMAN & MORROW**

By: _____
 Susan Caldwell
 Co-Liaison Counsel for Defendant
 Trade Associations

19 DATED: March 21, 2002 **SEDGWICK, DETERT, MORAN & ARNOLD**

By: Wayne A. Wolf
 Wayne A. Wolf
 Co-Liaison Counsel for Defendant
 Distributors

23 DATED: March ____, 2002 **MILBERG WEISS BERSHARD HYNES & LERACH LLP**

By: _____
 Michael J. Dowd
 Co-Liaison Counsel for Plaintiffs

1724400.1

- 1 G. Trial
- 2 March 21, 2003 Trial readiness conference
- 3 April 23, 2003 Trial
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ORDER

The foregoing is hereby made an Order of this Court.

7 Dated: March 26, 2002 Vincent P. DiFuria
 8 Vincent P. DiFuria
 9 Judge of the Superior Court

APPROVED AS TO FORM AND CONTENT:

11 DATED: March __, 2002 LUCE, FORWARD, HAMILTON & SCRIPPS LLP
 12
 13 By: _____
 14 Lawrence J. Kouns
 Co-Liaison Counsel for Defendant
 Manufacturers

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 24 LERACH LLP
 25 By: Michael J. Dowd
 26 Michael J. Dowd
 27 Co-Liaison Counsel for Plaintiff
 28

1724-001

SEDGWICK,
DETERT, MORAN
& ARNOLD

*(names)
Please
send
to all
& attorneys
Case 2058*

TELECOMMUNICATIONS COVER PAGE

DATE: MARCH 25, 2002

TIME:

THE FOLLOWING DOCUMENT, INCLUDING THIS COVER PAGE, IS 5 PAGES.

IF ANY PORTION OF THE FOLLOWING DOCUMENT IS ILLEGIBLE OR MISSING, PLEASE CALL THE TELECOMMUNICATIONS OPERATOR LISTED BELOW AS SOON AS POSSIBLE.

THIS DOCUMENT IS FROM:

NAME: Wayne A. Wolff

CASE NAME: CA Firearm Cases OPERATOR'S FACSIMILE NUMBER: (415) 781-2635

OUR FILE NUMBER: 1096-84476 OPERATOR'S TELEPHONE NUMBER: (415) 781-7900, x2058

PRIVILEGE AND CONFIDENTIALITY NOTICE

The information in this facsimile is intended for the named recipients only. It may contain privileged and confidential matter. If you have received this facsimile in error, please notify us immediately by a collect call to (415) 781-7900 and return the original to the sender by mail. We will reimburse you for postage. Do not disclose the contents to anyone. Thank you.

PLEASE DELIVER IMMEDIATELY TO THE FOLLOWING PARTIES:

<u>NAME</u>	<u>FAX NO.</u>	<u>PHONE NO.</u>
Alan Lazarus/Matt LePore	(415) 397-1735	(415) 397-1730
Michael Hewitt	(714) 755-0195	(714) 755-0194
Phillip Hudson, III	(305) 579-4722	(305) 536-8868
Scott Braum	(937) 449-2836	(937) 449-2849
Chuck Michel	(310) 548-4813	(310) 548-0410
Peter Downey	(619) 234-9060	(619) 234-0281
Ian Feldman	(626) 974-8403	(626) 858-2444
Daniel K. Robyn	(213) 623-6336	(213) 623-7400

Message: Please see Case Management Order No. 5 with new dates, per my recent e-mail. Please call with any questions.

Wayne

PRO-SF/78331

SEDGWICK,
DETERT, MORAN
& ARNOLD

One Embarcadero Center, 16th Floor, San Francisco, California 94111-3628

One Embarcadero Center Sixteenth Floor San Francisco, California (213) 426-6900 94111-3765 Tel. 415.781.7900	LOS ANGELES ORANGE COUNTY (714) 852-8200	CHICAGO (312) 641-9050	NEW YORK (212) 422-0202	LONDON (071) 929-1829	ZURICH (01) 201-1730
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LUCE FORWARD

ATTORNEYS AT LAW • FOUNDED 1873
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

LAWRENCE J. KOUNS, PARTNER
DIRECT DIAL NUMBER 619.699.2437

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Suite 2600
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619.236.1414
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March 20, 2002

Via Telecopier

Susan Caldwell
Koletsky, Mancini, Feldman & Morrow
3460 Wilshire Boulevard, 8th Floor
Los Angeles, California 90010-2228

Jonah Goldstein
Milberg Weiss Bershad Hynes & Lerach, LLP
401 "B" Street, Suite 1700
San Diego, California 92101

Wayne A. Wolff
Sedgwick, Detert, Moran & Arnold
One Embarcadero Center, 16th Floor
San Francisco, California 94111-3765

Re: California Firearms Litigation
JCCP No. 4095

Dear Counsel:

Enclosed is Proposed Case Management Order No. 5. It extends all dates by eight weeks and the trial date by nine weeks (because eight weeks falls on Good Friday). Please send me your signature and I will forward it to the court.

Very truly yours,



Lawrence J. Kouns
of
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

LJK/rme
cc: James B. Vogts

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