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7 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
8 THE MAYOR OF SAN FRANCISCO and
THE CHIEF OF THE SAN FRANCISCO POLICE DEPARTMENT
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 ESPANOLA JACKSON, PAUL COLVIN,
THOMAS BOYER, LARRY BARSETTI,
15 DAVID GOLDEN, NOEMI MARGARET
ROBINSON, NATIONAL RIFLE
16 ASSOCIATION OF AMERICA, INC., and
SAN FRANCISCO VETERAN POLICE
17 OFFICERS ASSOCIATION,

18 Plaintiffs,

19 vs.

20 CITY AND COUNTY OF SAN
FRANCISCO, THE MAYOR OF SAN
21 FRANCISCO, and THE CHIEF OF THE SAN
FRANCISCO POLICE DEPARTMENT, in
22 their official capacities,

23 Defendants.
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Case No. C09-2143 RS

**DECLARATION OF CATHY GARZA IN
SUPPORT OF CITY AND COUNTY OF SAN
FRANCISCO'S OPPOSITION TO
PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: Oct. 4, 2012
Time: 1:30 p.m.
Place: 450 Golden Gate Ave.
Courtroom 3 - 17th Floor
San Francisco, CA 94102

1 I, Cathy Garza, declare as follows:

2 1. I am an Investigator with the San Francisco City Attorney's Office. The matters stated
3 in this declaration are based on my personal observations and knowledge except where stated
4 otherwise. I could and would testify competently to the matters stated in this declaration.

5 2. On September 7, 2012, I tested a new **Stack-On Personal Safe with Biometric Lock**
6 **(Serial #Y111HD0370584)**. This is a lockbox for the storage of handguns. I opened the lockbox with
7 the set of keys provided with the unit. I installed batteries in the unit. This unit can be opened by
8 keys, by a four-digit code entered into a keypad, or by biometric fingerprint scanning. After
9 familiarizing myself with the unit, I attempted to open the unit five times using the keypad by entering
10 a four-digit code that I selected. Another investigator timed my attempts. The time it took me to open
11 the unit on each attempt was as follows:

1	2.90 seconds
2	2.90 seconds
3	2.89 seconds
4	2.49 seconds
5	3.05 seconds

15 3. Next, I tested the same unit using the biometric fingerprint scanner. I attempted to open
16 the unit five times in this manner. Another investigator timed my attempts. The time it took me to
17 open the unit on each attempt was as follows:

1	3.50 seconds
2	3.57 seconds
3	3.59 seconds
4	3.35 seconds
5	3.05 seconds

21 4. On September 11, 2012, I tested a new **Stack-On Strong Box Safe with Electronic**
22 **Lock (Serial #L222GM1720472)**. This is a lockbox for the storage of handguns. I opened the
23 lockbox with the set of keys provided with the unit. I installed batteries in the unit. This unit can be
24 opened by keys and by codes of three to nine digits (according to the user's preference) entered into a
25 keypad. After familiarizing myself with the unit, I created a three-digit code and attempted to open the
26 unit five times by entering the code into the keypad. Another investigator timed my attempts. The
27 time it took me to open the unit on each attempt using a three-digit code was as follows:

1	2.70 seconds
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2	2.60 seconds
3	2.80 seconds
4	2.60 seconds
5	2.60 seconds

5. Next, I created a four-digit code and attempted to open the unit five times by entering the code into the keypad. Another investigator timed my attempts. The time it took me to open the unit on each attempt using a four-digit code was as follows:

1	2.60 seconds
2	2.60 seconds
3	3.60 seconds
4	2.80 seconds
5	2.60 seconds

6. Next, I created a five-digit code and attempted to open the unit five times by entering the code into the keypad. Another investigator timed my attempts. The time it took me to open the unit on each attempt using a five-digit code was as follows:

1	3.80 seconds
2	4.10 seconds
3	4.00 seconds
4	3.80 seconds
5	4.20 seconds

7. Next, I created a six-digit code and attempted to open the unit five times by entering the code into the keypad. Another investigator timed my attempts. The time it took me to open the unit on each attempt using a six-digit code was as follows:

1	4.50 seconds
2	4.20 seconds
3	4.30 seconds
4	4.30 seconds
5	3.50 seconds

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 12th day of September, 2012, in San Francisco, California.


CATHY GARZA