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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

Coordination Proceeding Special Title (Rule 1550(b))) JUDICIAL COUNCIL COORDINATION
FIREARM CASE) PROCEEDING NO. 4095
Including actions:)
People, et al. v. Arcadia Machine & Tool, Inc., et al.) San Francisco Superior Court No. 303753
People, et al. v. Arcadia Machine & Tool, Inc., et al.) Los Angeles Superior Court No. BC210894
People, et al. v. Arcadia Machine & Tool, Inc., et al.) Los Angeles Superior Court No. BC214794
DATE: January 26, 2001
TIME: 8:30 a.m.
DEPT: 65
Hon. Vincent P. DiFiglia

DECLARATION OF CHRIS HADLEY IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT MANUFACTURERS'
MOTION TO COMPEL

1 I, Chris Hadley, declare as follows:

2 1. I am a Supervisor in the Sacramento City Police Department's Property Section
3 ("Property Section") and have been employed in this position since approximately April 1992 and
4 within the Property Section for more than 26 years. Part of my duties include supervising the
5 preparation and maintenance of records kept in the Property Section. Except as otherwise stated, I
6 have personal knowledge of the facts stated below and, if called to testify, could and would testify
7 to them competently.

8 2. Employees of the Property Section do not have a way to search electronically through
9 the property records to locate incidents of suicides or accidental shootings. To locate incidents of
10 suicides or accidental shootings, one would have to review, by hand, each and every property record
11 with a firearm involved and request a copy of the report from the Police Department's Records
12 Section. The total number of property records involving firearms between 1996 and 1999 is
13 approximately 6,000 per year. If one person were to review all of the pertinent property records, it
14 would take approximately 120 hours, if not more. If such a review were conducted by an employee
15 of the Property Section, the employee would have to incorporate the review into the employee's daily
16 assignments. Based upon current resources, I estimate that such a review would take approximately
17 six months to complete. Once the property records were located, a different employee in the Records
18 Section would be required to copy each report to identify the requested information. Once the
19 records have been identified and copied, they must be returned to the Property Section where an
20 employee would be required to compile the information.

21 3. I am aware of the burden and effort involved in producing such information because
22 a similar effort was undertaken to produce information for a study entitled "Gun Confiscations: A
23 Case Study of the City of Sacramento in 1995," copies of which I am informed plaintiffs have
24 produced to defendants. PLTF0006915-6924. To prepare this report, one person, not employed by
25 the City of Sacramento, came into the Property Section at periodic intervals during a six-to-seven
26 month time frame in 1996. She reviewed, by hand, approximately 1,700 to 1,800 property reports
27 involving a firearm. Where more information was required, a copy of the police report was ordered.
28 Information gathered included the type of firearm, the type of crime, the incident location, the
suspect's age and other related information.

1 4. The Property Section of the Sacramento City Police Department does not have the
2 resources in labor or software to search through every property record and compile the requested
3 information. Requiring members of the Sacramento City Police Department to devote precious time
4 and effort in locating such information would seriously impair their ability to perform their daily
5 duties. Moreover, the Sacramento City Police Department does not have the resources to pay for its
6 personnel to search such records by hand.

7 5. It is my belief that the Coroner's Office for the County of Sacramento, which is not
8 a party to this action, maintains data on incidents of accidental shootings and suicides.

9 I declare under penalty of perjury under the laws of the State of California that the foregoing
10 is true and correct to the best of my knowledge and belief. Executed this 8th day of January, 2001
11 in Sacramento, California.

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13 Chris Hadley
14 CHRIS HADLEY
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(*People, et al. v. Arcadia Machine & Tool, Inc., et al.*)
 San Francisco Superior Court No. 303753
 Los Angeles Superior Court No. BC210894
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