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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

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

DECLARATION OF JANIE ITO IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANT MANUFACTURERS' MOTION TO COMPEL

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I, Janie Ito, declare as follows:

1. I am the Chief of the Public Services Division of the Los Angeles County Coroner where I have been employed in this position since 1995 and have been within the Public Services Division for more than 10 years. Part of my duties include supervising the preparation and maintenance of records kept by the Coroner's Department. Except as otherwise stated, I have personal knowledge of the facts stated below and if called to testify, could and would testify to them competently.

2. I requested that an employee from our Forensic Data Information Systems Division perform a computer search to determine how many firearm suicides and accidental firearm shootings resulting in death there were from 1996 to 2000. In Los Angeles County, from the period 1996 to 2000, there were approximately 1,908 suicides by firearm, and 50 accidental firearm shootings resulting in death.

3. As the Chief of Public Services, I am familiar with the time required to pull cases within the Coroner's Department. On average, it takes 7 hours per 100 cases to pull the file and retrieve the information. Cases from 1996 through 1998 are located in boxes in our Archive Section and take longer to retrieve. Based on a 40 hour workweek, it would take approximately 3.5 weeks to pull the backup documentation for both suicide and accidental deaths by firearm. This effort would be extremely burdensome for my department, particularly when the database is available and can be obtained with relatively little impact on the resources of the Coroner's Department.

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 January, 2001, at Los Angeles, California.

Janie Ito

JANIE ITO

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DECLARATION OF SERVICE

In re Firearm Case
No. JCCP 4095

(People, et al. v. Arcadia Machine & Tool, Inc., et al.)
San Francisco Superior Court No. 303753
Los Angeles Superior Court No. BC210894
Los Angeles Superior Court No. BC214794

I, Veronica Rivera, declare:

1. That I am and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested in the within action; that my business address is 600 West Broadway, Suite 1800, San Diego, California 92101.

2. That on January 12, 2001, I served the **DECLARATION OF JANIE ITO IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT MANUFACTURERS' MOTION TO COMPEL** by JusticeLink Electronic filing on all persons appearing on the Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of January, 2001, at San Diego, California.

Veronica Rivera
VERONICA RIVERA