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15 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
16 COUNTY OF SAN DIEGO

17 Coordination Proceeding Special Title  
18 (Rule 1550(b))  
19 FIREARM CASES

20 Including actions:

21 *People, etc., et al. v. Arcadia Machine & Tool,*  
22 *Inc., et al.*  
23 *People, etc., et al. v. Arcadia Machine & Tool,*  
24 *Inc., et al.*  
25 *People, etc., et al. v. Arcadia Machine & Tool,*  
26 *Inc., et al.*

JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 4095

San Francisco Superior Court No. 303753

Los Angeles Superior Court No. BC210894

Los Angeles Superior Court No. BC214794

**DECLARATION OF LIEUTENANT  
PATRICK T. ADAMS IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO COMPEL**

DATE: January 26, 2001  
TIME: 8:30 a.m.  
DEPT: 65  
JUDGE: Hon. Vincent P. DiFiglia

1 I, Patrick T. Adams, declare as follows:

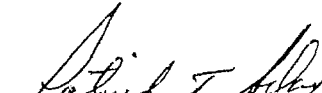
2 1. I am a Lieutenant and Unit Commander at the Coroner's Bureau of the Ala  
3 County Sheriff's Office. I have been employed in this position since approximately October 199  
4 with the Sheriff's Office in general for approximately 19 years. Part of my duties include superv  
5 the preparation and maintenance of records kept by the Coroner's Bureau of the Alameda She  
6 Office. Except as otherwise stated, I have personal knowledge of the facts stated below and, if c  
7 to testify, could and would testify to them competently.

8 2. The Coroner's Bureau has only kept searchable computerized records  
9 indicate whether a firearm was used in suicide or accident resulting in a death since about May 1  
10 From 1993 to May 1998, the Bureau's computerized records only indicate the manner of death, b  
11 not include searchable information regarding a sub-manner referencing if a firearm was used. Pri  
12 1993, no computerized records were maintained. The Coroner's office creates approximately 35  
13 4000 records each year. To identify the underlying Coroner's reports involving firearm accidents  
14 suicides since 1996 a clerk would have to manually review thousands of documents. Moreover  
15 underlying reports usually do not contain detailed information regarding the gun itself. That inform  
16 may be maintained by the reporting law enforcement agency, but there is no way to readily c  
17 reference the Coroner's reports with those of the law enforcement agencies' records. Such a re  
18 would need to be conducted by one of my two Specialist Clerks in addition to their regularly assi  
19 duties. They would have to incorporate the assignment into his/her daily tasks. Once the records  
20 been located, the employee would be required to copy each report to identify the requested informa  
21 redact information where necessary, and then replace the documents to their proper place. Such a  
22 for the time in question would entail the examination of approximately 6,000 files. This represents  
23 approximate number of autopsies performed during the specified time (1996 through 2000). Each  
24 search takes approximately 15 minutes to complete, once the file is physically at the Coroner's Bur  
25 This translates to approximately 40 work weeks, full time, or approximately ten (10) month  
26 dedicated work. Based upon current resources, I estimate that such a review would take approxima  
27 four (4) years to complete, if the clerk could dedicate approximately 20% of each work day to this t

1                   3.       The Coroner's Bureau does not have the resources or labor to search th  
2 these records to compile the requested information. Requiring members of the Alameda Sheriff's (  
3 Coroner's Bureau to devote precious time and effort in locating such information would seriously i  
4 their ability to perform their daily duties.

5                   4.       Finally, pursuant to Alameda County Ordinance 2.56.120, the Coroner's B  
6 is not authorized to provide copies of these documents absent a subpoena for the same. The  
7 issuing the subpoena is also required to pay \$23.00 per record for their production. Additionally,  
8 2.56.120 requires a fee of \$15.00 per case retrieved from archive storage and an "Additional  
9 charge, for each ¼ hour, for any extraordinary search for records when the requester does not  
10 complete biographical information needed for a routine search." This additional labor charge is \$  
11 per each ¼ hour.

12                   I declare under penalty of perjury under the laws of the State of California tha  
13 foregoing is true and correct to the best of my knowledge and belief. Executed this 11<sup>th</sup> day of Jan  
14 2001 in Oakland, California.

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18                   PATRICK T. ADAMS  
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1 **DECLARATION OF SERVICE**

2 *In re Firearm Case*  
3 No. JCCP 4095

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

8 I, Veronica Rivera, declare:

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

13 2. That on January 12, 2001, I served the **DECLARATION OF LIEUTENANT**  
14 **PATRICK T. ADAMS IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S**  
15 **MOTION TO COMPEL** by JusticeLink Electronic filing on all persons appearing on the Service  
16 List.

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

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

21 Veronica Rivera  
22 VERONICA RIVERA  
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