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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 TROY HART IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANT MANUFACTURERS' MOTION TO COMPEL

1 I, TROY HART, declare as follows:

2 1. I am the Director of Systems for the Los Angeles Police Department (LAPD) where  
3 I have been employed in this position since 1997, and have been within the Information and  
4 Technology Division since 1983. My duties include supervising maintenance and development of  
5 the information systems of the LAPD. Except as otherwise stated, I have personal knowledge of the  
6 facts stated below and if called to testify, could and would testify to them competently.

7 2. In the case of accidental shootings or suicide attempts resulting in death, LAPD's  
8 database does not classify incidents as "accidental shootings" or "suicides". As a result, the number  
9 of accidental shootings and suicides that are reported under the jurisdiction of the LAPD is not  
10 directly ascertainable. Rather, these incidents would be part of a broader homicide classification.  
11 The compilation of the quantity of accidental shooting and suicides would therefore require a manual  
12 review of all reports under the aforementioned categories, an extremely cumbersome task requiring  
13 a substantial allocation of scarce resources. Moreover, these reports would not include suicides  
14 investigated by LAPD where it is clearly established that no crime was committed.

15 3. In the case of accidental shootings or suicide attempts resulting in injury, the LAPD  
16 database does not classify incidents as "accidental shootings" or "suicides". As a result, the quantity  
17 of accidental shootings and suicide attempts that are reported under the jurisdiction of the LAPD is  
18 not directly ascertainable. Rather, these incidents would be part of broader classifications, such as  
19 "Homicide" or "Assault with a Deadly Weapon" ("ADW"). The compilation of the quantity of  
20 accidental shooting and suicides would therefore require a manual review of all reports under the  
21 aforementioned categories, an extremely cumbersome task requiring a substantial allocation of  
22 scarce resources. Furthermore, in the case of an on-going investigation, there would not necessarily  
23 be a determination of whether the incident was an accidental shooting or suicide.

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4. LAPD does not have a computerized method for deleting confidential information from incident reports. Accordingly, redacting such information would need to be conducted manually and would pose a significant burden on staff resources.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 11th day of January, 2001, at Los Angeles, California.

Troy Hart  
TROY HART

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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 TROY HART 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