

1 Robert J. Nelson (SBN 132797)  
Richard M. Franco (SBN 170970)  
2 Jennie Lee Anderson (SBN 203586)  
LIEFF, CABRASER, HEIMANN  
3 & BERNSTEIN, LLP  
Embarcadero Center West  
4 275 Battery Street, 30th Floor  
San Francisco, CA 94111-3339  
5 Telephone: (415) 956-1000  
Facsimile: (415) 956-1008  
6  
Michael J. Dowd (SBN 135628)  
7 Jonah Goldstein (SBN 193777)  
Stephen P. Polapink (SBN 177489)  
8 MILBERG WEISS BERSHAD HYNES &  
LERACH, LLP  
9 600 West Broadway, Suite 1800  
San Diego, CA 92101  
10 Telephone: (619) 231-1058  
Facsimile: (619) 231-7423  
11  
Patrick J. Coughlin (SBN 111070)  
12 Ex Kano Sams (SBN 192936)  
MILBERG WEISS BERSHAD HYNES &  
13 LERACH, LLP  
100 Pine Street, Suite 2600  
14 San Francisco, CA 94111  
Telephone: (415) 288-4545  
15 Facsimile: (415) 288-4534

Thomas F. Casey III, County Counsel (SBN 47:  
Brenda B. Carlson, Deputy (SBN 121355)  
Hall of Justice & Records  
400 County Center, 6th Floor  
Redwood City, CA 94063  
Telephone: (650) 363-4760  
Facsimile: (650) 363-4034

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

18 Coordination Proceeding Special Title  
19 (Rule 1550(b))

JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 4095

20 FIREARM CASES  
Including actions:

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

San Francisco Superior Court No. 303753  
Los Angeles Superior Court No. BC210894  
Los Angeles Superior Court No. BC214794

**DECLARATION OF WILLIAM D. PEDRIN  
IN SUPPORT OF PLAINTIFFS' OPPOSITIO  
TO DEFENDANTS' MOTION TO COMPEL**

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

28

1 I, WILLIAM D. PEDRINI, declare as follows:

2 1. I am an Assistant Sheriff currently assigned to the San Mateo County Sheriff's Office. I  
3 have been a police officer since August 1968, and employed with the San Mateo County Sheriff's Office  
4 since April 1967. I am familiar with and could testify to the preparation and maintenance of records kept  
5 the San Mateo County Sheriff's Office. Except as otherwise stated, I have personal knowledge of the fac  
6 stated below and, if called to testify, could and would testify to them competently.

7 2. There are over eleven thousand (11,000) reports generated every year to the San Mateo  
8 County Sheriff's Office. All reports generated prior to 1994 are on microfiche and are not computerized  
9 therefore, would have to be searched manually. In regards to reports generated after 1994, to electronica  
10 search these records, a program would have to be created to search for specific information and, even if s  
11 a program were created, reports that had "hits" for specific keywords would have to be pulled by hand to  
12 determine the specific incident that the report involved.

13 3. There is no way to search electronically through the Property Unit records to locate incid  
14 of suicides or accidental shootings. The Property Unit receives approximately 2500 to 2600 cases per ye  
15 The Property Unit cannot, through a computer, distinguish which of these cases involve firearms. Each c  
16 would have to be reviewed and then a hand search of the evidence in the property bin would be necessary  
17 see it if contained a firearm. If one person were to perform this task full time, it would take approximate  
18 100 hours, if not more for each year of cases. As the Sheriff's Office does not have staffing for this, an  
19 employee would have to incorporate the review into the employee's daily assignments and overtime wou  
20 incurred. I estimate that such a review would take approximately five months to complete. Once the  
21 property records have been located, a different employee in the Records Unit would be required to copy  
22 report to identify the requested information. Once the records have been identified and copied, they mus  
23 returned to the Property Unit where an employee would be required to compile the information.

24 4. The Property Unit of the San Mateo County Sheriff's Office does not have the resources  
25 labor or software to search through every property record and compile the requested information. Requ  
26 members of the San Mateo County Sheriff's Office to devote precious time and effort in locating such  
27 information would seriously impair their ability to perform their daily duties. Moreover, the San Mateo  
28 County Sheriff's Office does not have the resources to pay for its personnel to search such records by ha

5. The firearms purchased for sheriff deputies are different from the firearms sold to the ge  
public. Moreover, sheriff deputies are highly trained in the use of their weapons. To qualify for use of a  
handgun, each officer must complete approximately 120 hours of training. Additionally, sheriff deputies

1 must maintain proficiency in firearm use by successfully completing a minimum of two handgun  
2 qualifications and one shotgun practice session per year. Thus, the use of handguns by sheriff deputies is  
3 comparable to use of handguns by non-sworn members of the public.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing is tr  
5 and correct to the best of my knowledge and belief. Executed this 8th day of January, 2001 in Redwood  
6 California.

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9 WILLIAM D. PEDRINI

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(*People, et al. v. Arcadia Machine & Tool, Inc., et al.*)  
 San Francisco Superior Court No. 303753  
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