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12 SUPERIOR COURT OF CALIFORNIA

13 COUNTY OF SAN DIEGO

14 Coordination Proceeding Special Title (Rule) JUDICIAL COUNCIL COORDINATION
1550(b)) PROCEEDING NO. 4095
16 FIREARM CASE)
17 Including actions:)
18 *People, et al. v. Arcadia Machine & Tool, Inc.,*) San Francisco Superior Court No. 303753
et al.)
19 *People, et al. v. Arcadia Machine & Tool, Inc.,*) Los Angeles Superior Court No. BC210894
et al.)
20 *People, et al. v. Arcadia Machine & Tool, Inc.,*) Los Angeles Superior Court No. BC214794
et al.)
21)
22) DATE: January 26, 2001
TIME: 8:30 a.m.
DEPT: 65
23 Hon. Vincent P. DiFiglia

24 DECLARATION OF MERVAT FARAG IN SUPPORT OF PLAINTIFFS'
25 OPPOSITION TO DEFENDANT MANUFACTURERS' MOTION TO COMPEL
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1 I, MERVAT FARAG, declare as follows:

2 1. I am an EDP Programmer Analyst of the Forensic Data Information Systems Division
3 of the Los Angeles County Coroner where I have been employed in this position since 1989. Part
4 of my duties include maintaining the data and information systems kept by the Coroner's
5 Department. Except as otherwise stated, I have personal knowledge of the facts stated below and
6 if called to testify, could and would testify to them competently.

7 2. Employees of the Forensic Data Information Systems Division can search
8 electronically through a Los Angeles County Coroner database to determine the quantity of firearm
9 suicides or deaths by accidental firearm shootings. The electronic database can also sufficiently
10 identify the sex, age, place of death, and place of injury as well as eliminate confidential information
11 relating to next of kin. Compilation of this database containing relevant information would be
12 relatively easy to gather and would take approximately one week.

13 3. I performed a computer search to determine how many firearm suicides and accidental
14 firearm shootings resulting in death there were from 1996 to 2000. In Los Angeles County, from the
15 period 1996 to 2000, there were approximately 1,908 suicides by firearm, and 50 accidental firearm
16 shootings resulting in death.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed this 12th day of January, 2001, at Los Angeles, California.

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Mervat Farag
MERVAT FARAG

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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
 Los Angeles Superior Court No. BC214794

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