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10  
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF SAN DIEGO  
13

14 Coordination Proceeding  
Special Title (Rule 1550 (b))

15  
16 FIREARMS CASE

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18  
19 Including actions:

20 *People, et al. v. Arcadia Machine & Tool, Inc.,*  
21 *et al.*

22 *People, et al. v. Arcadia Machine & Tool, Inc.,*  
23 *et al.*

24 *People, et al. v. Arcadia Machine & Tool, Inc.,*  
25 *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 LAWRENCE J.**  
) **KOUNS IN SUPPORT OF REPLY BRIEF**  
) **RE MOTION TO COMPEL PLAINTIFFS**  
) **TO DISCLOSE (1) ACCIDENTAL**  
) **DISCHARGE AND SUICIDE INCIDENTS**  
) **AND (2) PLAINTIFFS' APPROVAL AND**  
) **USE OF SPECIFIC FIREARMS**

)  
) DATE: January 26, 2001  
) TIME: 8:30  
) DEPT: 65  
) JUDGE: Honorable Vincent P. DiFiglia

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1 I, Lawrence J. Kouns, declare as follows:

2 1. I am an attorney licensed to practice before the courts of the State of California and am  
3 a member of the law firm of Luce, Forward, Hamilton & Scripps LLP, attorneys of record for Sturm,  
4 Ruger & Company, Inc. and Co-Liaison counsel for the Defendant Manufacturers in this case. If  
5 called as a witness, I could and would testify as follows:

6 2. Attached to the Notice of Lodgment as Exhibit 1 is a true and correct copy of a  
7 summary of data provided by East Palo Alto concerning recovered firearms that were manufactured  
8 or sold by defendants in this case.

9 3. Attached to the Notice of Lodgment as Exhibit 2 is a true and correct copy of excerpts  
10 from the deposition of the Person Most Knowledgeable ("PMK") designated by the City of Berkeley  
11 regarding its system of records maintenance and retrieval of firearm incidents.

12 4. Attached to the Notice of Lodgment as Exhibit 3 is a true and correct copy of excerpts  
13 from the deposition of the PMK designated by the City of East Palo Alto regarding its system of  
14 records maintenance and retrieval of firearm incidents.

15 5. Attached to the Notice of Lodgment as Exhibit 4 is a true and correct copy of excerpts  
16 from the deposition of the PMK designated by the City of Oakland regarding its system of records  
17 maintenance and retrieval of firearm incidents.

18 6. Attached to the Notice of Lodgment as Exhibit 5 is a true and correct copy of excerpts  
19 from the deposition of the PMK designated by San Mateo County regarding its system of records  
20 maintenance and retrieval of firearm incidents.

21 7. Attached to the Notice of Lodgment as Exhibit 6 are true and correct copies of excerpts  
22 from the deposition of the PMK designated by the County of Los Angeles regarding its system of  
23 records maintenance and retrieval of firearm incidents.

24 8. Attached to the Notice of Lodgment as Exhibit 7A are true and correct copies of  
25 excerpts from the deposition of a PMK (Christopher P. Hadley) designated by the City of Sacramento  
26 regarding its system of records maintenance and retrieval of firearm incidents.

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1           9.       Attached to the Notice of Lodgment as Exhibit 7B are true and correct copies of  
2 excerpts from the deposition of a PMK (Paul Martinson) designated by the City of Sacramento  
3 regarding its system of records maintenance and retrieval of firearm incidents.

4           10.      Attached to the Notice of Lodgment as Exhibit 8 are true and correct copies of excerpts  
5 from the deposition of the PMK designated by the City of Inglewood regarding its system of records  
6 maintenance and retrieval of firearm incidents.

7           11.      Attached to the Notice of Lodgment as Exhibit 9 are true and correct copies of excerpts  
8 from the deposition of the PMK designated by the City of Los Angeles regarding its system of records  
9 maintenance and retrieval of firearm incidents.

10          12.      Attached to the Notice of Lodgment as Exhibit 10 are true and correct copies of  
11 excerpts from the deposition of the PMK designated by San Francisco regarding its system of records  
12 maintenance and retrieval of firearm incidents.

13          13.      Attached to the Notice of Lodgment as Exhibit 11 are true and correct copies of  
14 excerpts from the deposition of the PMK designated by Alameda County regarding its system of  
15 records maintenance and retrieval of firearm incidents.

16          14.      Attached to the Notice of Lodgment as Exhibit 12 are true and correct copies of a  
17 summary of data provided by Alameda County concerning recovered firearms that were manufactured  
18 or sold by defendants in this case.

19          15.      Attached to the Notice of Lodgment as Exhibit 13 are true and correct copies of a  
20 summary of data provided by the City of Berkeley concerning recovered firearms that were  
21 manufactured or sold by defendants in this case.

22          16.      Attached to the Notice of Lodgment as Exhibit 14 are true and correct copies of pages  
23 from the Reference Manual on Scientific Evidence (Federal Judicial Center 2d ed. 2000).

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1           17.     Attached to the Notice of Lodgment as Exhibit 15 are true and correct copies of page  
2 34 from the Reporter's Transcript of the July 14, 2000 hearing in this case.

3           I declare under penalty of perjury under the laws of the State of California that the foregoing  
4 is true and correct.

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6 Dated: January 19, 2001

Lawrence J. Kouns  
LAWRENCE J. KOUNS

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**DECLARATION OF SERVICE**

In re Firearms Case  
JCCP No. 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, Renee' M. Evans, declare:

1. I am, and was at the time of service of the papers herein referred to, over the age of eighteen years, and not a party to the action, and I am employed in the County of San Diego, State of California. My business address is Luce, Forward, Hamilton & Scripps LLP, 600 West Broadway, Suite 2600, San Diego, California 92101; telephone number (619) 236-1414; facsimile number (619) 645-5389.

2. On January 19, 2001, I served the following document(s): **DECLARATION OF LAWRENCE J. KOUNS IN SUPPORT OF REPLY BRIEF RE MOTION TO COMPEL PLAINTIFFS TO DISCLOSE (1) ACCIDENTAL DISCHARGE AND SUICIDE INCIDENTS AND (2) PLAINTIFFS' APPROVAL AND USE OF SPECIFIC FIREARMS** by JusticeLink Electronic filing on all persons appearing on the Service List.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 19, 2001 in San Diego, California.

Renee' Evans  
Renee' Evans