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

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

) JUDICIAL COUNCIL COORDINATION
) PROCEEDING NO. 4095

15
16 FIREARMS CASE

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

17 Including actions:

18 *People, et al. v. Arcadia Machine & Tool, Inc.,*
19 *et al.*

) **NOTICE OF TAKING DEPOSITION OF**
) **CITY OF EAST PALO ALTO (WITH**
) **REQUEST TO PRODUCE DOCUMENTS**
) **AT THE DEPOSITION)**

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

) Judge: Honorable Vincent P. DiFiglia

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

24 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

25 PLEASE TAKE NOTICE that Defendants Bryco Arms, Inc., Phoenix Arms, Excel

26 Industries, Beretta USA Corp., Fabbrica d'Armi Pietro Beretta, S.p.A., Browning Arms Co., Colt's
27 Manufacturing Co., Inc., Taurus International Manufacturing, Inc., Glock, Inc., H&R 1871, Inc.,
28 Heckler & Koch, Inc., Hi-Point Firearms, Kel-Tech CNC Industries, Navegar, Inc., North

1 American Arms, Inc., Sigarms, Inc., Smith & Wesson Corp. and Sturm, Ruger & Company, Inc.
2 (“Defendant Manufacturers”) will take the deposition(s) of the City of East Palo Alto’s designee(s)
3 regarding the topic set forth below. The deposition(s) will be taken on February 13, 2001 at 9:00
4 a.m. in the offices of Sedgwick, Detert, Moran & Arnold, One Embarcadero Center, 16th Floor,
5 San Francisco, California 94111-3765. The deposition(s) will be taken pursuant to the California
6 Rules of Civil Procedure, including CCP sections 2025(d) and (e)(2). The deposition(s) will
7 continue from day to day until completed.

8 The subject matters for which the City of East Palo Alto is requested to designate and
9 produce the person or persons most qualified to testify on its behalf are:

10 1. As to each firearm described in Exhibit A, all facts which refer or relate to the
11 ownership and/or acquisitional history of the firearm, including but not limited to whether the
12 firearm was acquired through lawful retail purchase, legal or illegal private sale, gun show
13 purchase, “kitchen table” dealer purchase, theft, gift, straw purchase or any other legal or illegal
14 activity.

15 The designee(s) are requested to produce at the deposition(s) the documents described in
16 Exhibit B hereto.

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18 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

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20 By: Lawrence J. Kouns
21 Lawrence J. Kouns
22 Co-Liaison Counsel for Defendant Manufacturers
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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 17, 2001, I served the following document(s): **NOTICE OF TAKING DEPOSITION OF CITY OF EAST PALO ALTO (WITH REQUEST TO PRODUCE DOCUMENTS AT THE DEPOSITION)** 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 17, 2001 in San Diego, California.

Renee' Evans
Renee' Evans