1 2	Lawrence J. Kouns, State Bar No. 095417 Christopher J. Healey, State Bar No. 105798 LUCE, FORWARD, HAMILTON & SCRIPPS 1 600 West Broadway, Suite 2600	JAN 25 2001
3	San Diego, California 92101-3391	OVIA 5.2 5001
4	Telephone No.: (619) 236-1414 Fax No.: (619) 232-8311	
5	James P. Dorr	The second secon
6	James B. Vogts WILDMAN, HARROLD, ALLEN & DIXON 225 West Wicker Drive	. కా తేకి
7	Chicago, Illinois 60606	
8	Telephone No.: (312) 201-2000 Fax No.: (312) 201-2555	
9	Co-Liaison Counsel for Defendant Manufacturer	rs
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))) JUDICIAL COUNCIL COORDINATION) PROCEEDING NO. 4095
15	opecial Title (Rule 1930 (0))) San Francisco Superior Court No. 303753
16	FIREARMS CASE) Los Angeles Superior Court No. BC210894) Los Angeles Superior Court No. BC214794
17	Including actions:) Los Angeles Superior Court No. BC214794
18	People, et al. v. Arcadia Machine & Tool, Inc.,) NOTICE OF TAKING DEPOSITION OF) COUNTY OF ALAMEDA (WITH
19	et al.) 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	et al.))
23	1.1644.4000.4004.4004.4004.4004.4004.400	J
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	

NOTICE OF TAKING DEPO OF COUNTY OF ALAMEDA (W/REQUEST TO PRODUCE DOCS AT DEPO)

1	American Arms, Inc., Sigarms, Inc., Smith & Wesson Corp. and Sturm, Ruger & Company, Inc.		
2	("Defendant Manufacturers") will take the deposition(s) of the County of Alameda's designee(s)		
3	regarding the topic set forth below. The deposition(s) will be taken on February 14, 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 County of Alameda is requested to designate and produc		
9	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.		
17			
18	LUCE, FORWARD, HAMILTON & SCRIPPS LLP		
19			
20			
21	By: <u>Lawrence J. Kouns</u> Lawrence J. Kouns		
22	Co-Liaison Counsel for Defendant Manufacturers		
23			
24			
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28			

DECLARATION OF SERVICE 1 In re Firearms Case 2 JCCP No. 4095 3 People, et al. v. Arcadia Machine & Tool, Inc., et. al. San Francisco Superior Court No. 303753 4 Los Angeles Superior Court No. BC210894 5 Los Angeles Superior Court No. BC214794 I, Renee' M. Evans, declare: 6 7 I am, and was at the time of service of the papers herein referred to, over the age of 1. eighteen years, and not a party to the action, and I am employed in the County of San Diego, State of 8 California. My business address is Luce, Forward, Hamilton & Scripps LLP, 600 West Broadway, 9 Suite 2600, San Diego, California 92101; telephone number (619) 236-1414; facsimile number (619) **10** 645-5389. 11 On January 17, 2001, I served the following document(s): NOTICE OF TAKING 2. 12 13 DEPOSITION OF COUNTY OF ALAMEDA (WITH REQUEST TO PRODUCE **DOCUMENTS AT THE DEPOSITION**) by JusticeLink Electronic filing on all persons appearing 15 on the Service List. I declare under penalty of perjury under the laws of the State of California that the foregoing 16 is true and correct. Executed on January 17, 2001 in San Diego, California. 17 18 Renee' Evans 19 Renee' Evans 20 21 22 23 24 25

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