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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))

) 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**
) **COUNTY OF ALAMEDA (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 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 produce
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.

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18 LUCE, FORWARD, HAMILTON & SCRIPPS LLP
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21 By: Lawrence J. Kouns
22 Lawrence J. Kouns
23 Co-Liaison Counsel for Defendant Manufacturers
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