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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))

15
16 FIREARMS CASE

17 Including actions:

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

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

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

)
) **SUPPLEMENTAL NOTICE OF**
) **LODGMET IN SUPPORT OF REPLY**
) **BRIEF RE MOTION FOR ORDER**
) **COMPELLING 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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25 Defendant Manufacturers hereby lodge the following documents in support of their Reply
26 Brief Re Motion For Order Compelling Plaintiffs to Disclose (1) Accidental Discharge and Suicide
27 Incidents and (2) Plaintiffs' Approval and Use of Specific Firearms:
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1 1. Summary of data provided by East Palo Alto concerning recovered firearms that
2 were manufactured or sold by defendants in this case.

3 2. Excerpts from deposition of Person Most Knowledgeable ("PMK") designated by
4 City of Berkeley regarding its system of records maintenance and retrieval of firearm incidents.

5 3. Excerpts from deposition of PMK designated by City of East Palo Alto regarding its
6 system of records maintenance and retrieval of firearm incidents.

7 4. Excerpts from deposition of PMK designated by City of Oakland regarding its
8 system of records maintenance and retrieval of firearm incidents.

9 5. Excerpts from deposition of PMK designated by San Mateo County regarding its
10 system of records maintenance and retrieval of firearm incidents.

11 6. Excerpts from deposition of PMK designated by County of Los Angeles regarding
12 its system of records maintenance and retrieval of firearm incidents.

13 7A. Excerpts from deposition of PMK (Christopher P. Hadley) designated by City of
14 Sacramento regarding its system of records maintenance and retrieval of firearm incidents.

15 7B. Excerpts from deposition of PMK (Paul Martinson) designated by City of
16 Sacramento regarding its system of records maintenance and retrieval of firearm incidents.

17 8. Excerpts from deposition of PMK designated by City of Inglewood regarding its
18 system of records maintenance and retrieval of firearm incidents.

19 9. Excerpts from deposition of PMK designated by City of Los Angeles regarding its
20 system of records maintenance and retrieval of firearm incidents.

21 10. Excerpts from deposition of PMK designated by San Francisco regarding its system
22 of records maintenance and retrieval of firearm incidents.

23 11. Excerpts from deposition of PMK designated by Alameda County regarding its
24 system of records maintenance and retrieval of firearm incidents.

25 12. Summary of data provided by Alameda County concerning recovered firearms that
26 were manufactured or sold by defendants in this case.

27 13. Summary of data provided by City of Berkeley concerning recovered firearms that
28 were manufactured or sold by defendants in this case.

1 14. Excerpts from Reference Manual on Scientific Evidence (Federal Judicial Center 2d
2 ed. 2000).

3 15. Excerpt from the Reporter's Transcript of July 14, 2000 hearing in this case.
4

5 Each of the above described documents are true and correct copies of the originals.
6

7 DATED: January 19, 2001

LUCE, FORWARD, HAMILTON & SCRIPPS LLP

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9 By: Lawrence J. Kouns

10 Lawrence J. Kouns

11 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 19, 2001, I served the following document(s): **SUPPLEMENTAL NOTICE OF LODGMENT IN SUPPORT OF REPLY BRIEF RE MOTION FOR ORDER COMPELLING 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