

FILED
STEPHEN THUNBERG
Clerk of the Superior Court

OCT 13 2000

By: M. MASES, Deputy
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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

Coordination Proceeding Special Title (Rule 1550(b))) JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4095

FIREARM CASE)

Including actions:)

People, et al. v. Arcadia Machine & Tool, Inc., et al.) San Francisco Superior Court No. 303753

People, et al. v. Arcadia Machine & Tool, Inc., et al.) Los Angeles Superior Court No. BC210894

People, et al. v. Arcadia Machine & Tool, Inc., et al.) Los Angeles Superior Court No. BC214794

WRITTEN DISCOVERY STIPULATION AND ORDER

10/13/2000

1 Defendants have identified a core set of discovery requests which are deemed served on the
2 Plaintiffs in the three coordinated cases. Defendant Manufacturers core discovery to Plaintiffs is the
3 following discovery previously served in San Francisco Superior Court No. 303753: H&R 1871
4 Special Interrogatories; H&R 1871 Request for Production; Sturm, Ruger Special Interrogatories;
5 Sturm, Ruger Request for Production; Smith & Wesson Special Interrogatories; Smith & Wesson
6 Request for Production; and the following discovery previously served in Los Angeles Superior
7 Court No. BC210894: Beretta Special Interrogatories and Beretta Request for Production.

8 Plaintiffs have identified a core set of discovery requests to: (1) Defendant Manufacturers
9 which are deemed served on all Defendant Manufacturers who have appeared in any of the three
10 coordinated cases. Plaintiffs' core discovery to Defendant Manufacturers is the following discovery
11 previously served in San Francisco Superior Court No. 303753: Special Interrogatories to
12 specifically identified manufacturers and First Set of Requests for Production of Documents; and
13 the following discovery previously served in Los Angeles Superior Court No. BC210894: First Set
14 of Requests for Production to Manufacturing Defendants; (2) Distributor Defendants which are
15 deemed served on all Distributor Defendants who have appeared in any of the three coordinated
16 cases. Plaintiffs' core discovery to the Distributor Defendants is the following discovery previously
17 served in San Francisco Superior Court No. 303753: First Set of Special Interrogatories (dated
18 September 30, 1999) and First Set of Requests for Production of Documents to Dealer and
19 Distributor Defendants; and the following discovery previously served in Los Angeles Superior
20 Court No. BC210894: First Set of Requests for Production of Documents to Distributor Defendants;
21 (3) Dealer Defendants which are deemed served on all Dealer Defendants who have appeared in any
22 of the three coordinated cases. Plaintiffs' core discovery to the Dealer Defendants is the following
23 discovery previously served in Los Angeles Superior Court No. BC210894: First Set of Requests
24 for Production of Documents to Dealer Defendants and the First Set of Special Interrogatories to
25 Dealer Defendants. (Dealer Defendant Traders Sports, Inc. shall respond to discovery previously
26 served by Plaintiffs in the San Francisco action.)

27 To the extent that any discovery propounded by the parties references a particular party, it
28 shall be deemed to seek a response as to each party in the three coordinated actions.

1 All core discovery, identified above, shall be deemed served on the date this agreement is
2 executed by liaison counsel for Plaintiffs, Defendant Manufacturers and Defendant Distributors.

3 Responses to core discovery and supplementation of prior responses are due thirty (30) days
4 from the date of service.

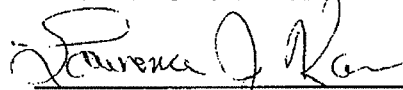
5 All responses to and motion practice relating to written discovery, other than the core
6 discovery identified above, shall be deferred for a period of ninety (90) days from the date of this
7 agreement, at which time the parties will meet-and-confer regarding the timing for responses to
8 deferred written discovery.

9 No written discovery shall be served by any party during the period of ninety days from the
10 date of this agreement.

11 Any party may initiate a meet-and-confer conference regarding any opposing party's previous
12 response to a core discovery request immediately following execution of this agreement.

13 ^{The} ~~This~~ parties waive the 45 day rule set forth in C.C.P. 2030(1) and 2031(m). Parties may
14 make motions to compel further responses to discovery at any time up to the deadline to complete
15 all fact discovery.

16 LUCE, FORWARD, HAMILTON & SCRIPPS
17 LAWRENCE J. KOUNS

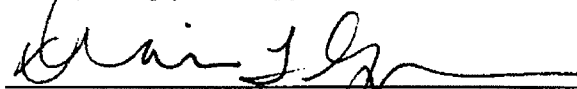
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* * *

ORDER

It is so ordered.

DATED: October 12, 2000


VINCENT P. DiFIGLIA
JUDGE OF THE SUPERIOR COURT

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