

99-191

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3 Los Angeles, California 90010
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4

5 Attorneys for Defendants National Shooting Sports Foundation, Inc. (NSSF), Sporting Arms and
6 Ammunition Manufacturers' Institute, Inc. (SAAMI), and American Shooting Sports Council, Inc.
(ASSC)
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF SAN DIEGO**
10

KOLETSKY, MANCINI, FELDMAN & MORROW
Lawyers
3460 Wilshire Blvd., Eighth Floor
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11 Coordination Proceeding
Special Title (Rule 1550(b)))
12)
13 FIREARM CASES)
14 Coordinated Actions:)
15)
16)
17)
18)
19 PEOPLE OF THE STATE OF)
CALIFORNIA v. ARCADIA MACHINE)
& TOOL, INC. et al.)
20)
21 PEOPLE OF THE STATE OF)
CALIFORNIA v. ARCADIA MACHINE)
& TOOL, INC. et al.)
22)
23 PEOPLE OF THE STATE OF)
CALIFORNIA v. ARCADIA MACHINE)
& TOOL, INC. et al.)
24)

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4095

DECLARATION OF SUSAN L.
CALDWELL IN SUPPORT OF
SPORTING ARMS AND
AMMUNITION MANUFACTURERS'
INSTITUTE, INC.'S OPPOSITION TO
PLAINTIFFS' MOTION TO COMPEL
FURTHER CORPORATE
DESIGNEES AND DOCUMENTS

[Filed Concurrently with Opposition to
Separate Statement In Support to
Motion to Compel and Opposition to
Plaintiff's Motion to Compel Another
Knowledgeable Corporate Designee]

San Francisco Superior Court Case
Number 303 753

Los Angeles Superior Court Case
Number BC 210894

Los Angeles Superior Court Case
Number BC 214794

Date: October 13, 2000
Time: 1:30 p.m.
Dept. 65

10-2-00

KOLETSKY, MANCINI, FELDMAN & MORROW
Lawyers
3460 Wilshire Blvd., Eighth Floor
Los Angeles, CA 90010
(213) 427-2350

1 I, Susan L. Caldwell, declare the following:

2 1. I am attorney at law duly licensed to practice before the courts of the State of
3 California. I am an associate with the law firm of Koletsky, Mancini, Feldman & Morrow,
4 attorneys of record for Defendant Sporting Arms and Ammunition Manufacturers' Institute, Inc.
5 (hereinafter referred to as "SAAMI"). I know the following facts to be true of my own knowledge
6 and if called to testify I could competently do so.

7 2. Attached hereto as Exhibit "A" is a true and correct copy of Plaintiffs' First Request
8 for Production, Set One, propounded on SAAMI.

9 3. Attached hereto as Exhibit "B" is a true and correct copy of Plaintiffs' Second
10 Request for Production, Set One, propounded on SAAMI.

11 4. Attached hereto as Exhibit "C" is a true and correct copy of Plaintiffs' Special
12 Interrogatories, Set One, propounded on SAAMI.

13 5. Attached hereto as Exhibit "D" is a true and correct copy of Plaintiffs' Form
14 Interrogatories, Set One, propounded on SAAMI.

15 6. Attached hereto as Exhibit "E" is a true and correct copy of SAAMI's initial response
16 to jurisdictional discovery.

17 7. Attached hereto as Exhibit "F" is a true and correct copy of the January 14, 2000,
18 letter providing supplemental response on behalf of SAAMI.

19 8. Attached hereto as Exhibit "G" is a true and correct copy of SAAMI's January 25,
20 2000 letter providing further jurisdictional discovery response.

21 9. Attached hereto as Exhibit "H" is a true and correct copy of SAAMI'S April 6, 2000
22 letter with respect to jurisdictional discovery.

23 10. Attached hereto as Exhibit "I" is a true and correct copy of SAAMI's April 13, 2000
24 letter with respect to jurisdictional discovery.

25 11. Attached hereto as Exhibit "J" is a true and correct copy of SAAMI's June 2, 2000
26 letter with respect to jurisdictional discovery.

27 12. Attached hereto as Exhibit "K" is a true and correct copy of SAAMI's June 14, 2000
28 letter with respect to jurisdictional discovery.

1 13. Attached hereto as Exhibit "L" is a true and correct copy of SAAMI's June 16, 2000
2 letter with respect to jurisdictional discovery.

3 14. Attached hereto as Exhibit "M" is a true and correct copy of SAAMI's June 23, 2000
4 letter with respect to jurisdictional discovery.

5 15. Attached hereto as Exhibit "N" is a true and correct copy of SAAMI's June 30, 2000
6 letter with respect to jurisdictional discovery.

7 16. Attached hereto as Exhibit "O" is a true and correct copy of SAAMI's July 7, 2000
8 letter with respect to jurisdictional discovery.

9 17. Attached hereto as Exhibit "P" is a true and correct copy of SAAMI's July 12, 2000
10 letter with respect to jurisdictional discovery.

11 19. Attached hereto as Exhibit "Q" is a true and correct copy of SAAMI's August 3, 2000
12 letter with respect to jurisdictional discovery.

13 20. Attached hereto as Exhibit "R" is a true and correct copy of SAAMI's August 7,
14 2000, formal response outlining supplemental jurisdictional discovery produced.

15 21. Attached hereto as Exhibit "S" is a true and correct copy of pertinent portions of
16 Robert Delfay's deposition.

17 22. Attached hereto as Exhibit "T" is a true and correct copy of documents relating to
18 SAAMI's California member, Weatherby.

19 23. Attached hereto as Exhibit "U" is a true and correct copy of publication listings for
20 SAAMI and NSSF.

21 24. Attached hereto as Exhibit "V" is a true and correct copy of previously produced
22 copies of literature lists for the period July, 1998 to December, 1998 for SAAMI and NSSF as Bates
23 Nos. N122-128.

24 25. Attached hereto as Exhibit "W" is a true and correct copy of previously produced
25 copies of documents relating to ANSI as Bates Nos. BS144-55.

26 26. Attached hereto as Exhibit "X" is a true and correct copy of previously produced
27 documents relating to the Mateel judgment and Proposition 65 as Bates Nos. S 78- 87.

28

1 27. Attached hereto as Exhibit "Y" is a true and correct copy of SAAMI's letter of
2 January 14, 2000 confirming that SAAMI does not maintain historic membership lists.

3 I declare under penalty of perjury that the foregoing is true and correct under the laws of the
4 State of California. Executed this 2nd day of October, 2000.

5
6 
7
8 SUSAN L. CALDWELL, Declarant

9 W:\ACP.102\motions\decl2 slc opp motion compel saami.wpd

EXHIBIT A