

99-191

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

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

Coordination Proceeding
Special Title (Rule 1550(b))

FIREARM CASES

Coordinated Actions:

PEOPLE OF THE STATE OF
CALIFORNIA v. ARCADIA MACHINE
& TOOL, INC. et al.

PEOPLE OF THE STATE OF
CALIFORNIA v. ARCADIA MACHINE
& TOOL, INC. et al.

PEOPLE OF THE STATE OF
CALIFORNIA v. ARCADIA MACHINE
& TOOL, INC. et al.

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**

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.

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7
8 SUSAN L. CALDWELL, Declarant

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