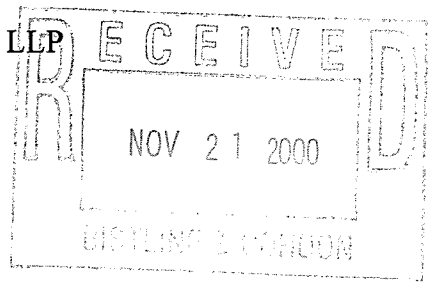


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Attorneys for Defendant, SIG Arms, Inc.

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

Coordination Proceeding)	JUDICIAL COUNCIL CORDINATION
Special Title (Rule 1550 (b)))	PROCEEDING NO. 4095
)	
FIREARMS CASE)	*San Francisco Superior Court No. 303753
)	Los Angeles Superior Court No. BC210894
Including actions:)	Los Angeles Superior Court No. BC2147934
)	
People, et al. v. Arcadia Machine & Tool, Inc., et al.)	RESPONSES TO THE PEOPLE OF THE STATE OF CALIFORNIA'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANT SIGARMS, INC
)	
People, et al. v. Arcadia Machine & Tool, Inc., et al.)	SAN FRANCISCO SUPERIOR COURT
)	<u>No. 303753</u>
People, et al. v. Arcadia Machine & Tool, Inc., et al.)	Hon. Vincent P. DiFiglia
)	
)	Dept.: 65

PROPOUNDING PARTY: Plaintiff THE PEOPLE OF THE STATE OF CALIFORNIA, et al.
RESPONDING PARTY: Defendant SIGARMS, INC.
SET NUMBER: ONE

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1 TO DEFENDANT AND ITS ATTORNEYS OF RECORD:

2 Defendant SIG Arms, Inc. ("SIGARMS"), by and through its attorneys, WILSON, ELSER,
3 MOSKOWITZ, EDELMAN & DICKER LLP, submits the following responses to Plaintiff's First
4 Set of Special Interrogatories:

5 **INTRODUCTORY STATEMENTS**

6 All of SIGARMS' responses to the interrogatories are based upon information presently
7 available. SIGARMS has not completed either its discovery or its preparation for trial. SIGARMS
8 search for information is ongoing. SIGARMS reserves its rights to rely on any facts, documents or
9 other evidence which may develop or come to its attention at a later time. Responses to these
10 interrogatories are based upon information known to SIGARMS at this time. The comments herein
11 are set forth without prejudice to SIGARMS' rights to supplement or amend any responses at any
12 time prior to trial. Accordingly, these responses are made without prejudice to SIGARMS' right to
13 present additional evidence or contentions at trial based upon information subsequently obtained or
14 evaluated. SIGARMS' reserves the right to supplement or amend its responses or present
15 additional evidence or contentions at a later date.

16 Information being provided in response to these interrogatories is limited to relevant, non-
17 privileged, non-confidential information in the possession of SIGARMS generated prior to the
18 institution of this litigation.

19 **GENERAL OBJECTIONS**

20 In spite of any instructions or definitions set forth by Plaintiffs to the contrary, these
21 interrogatories are being responded to in accordance with Local Rules of the Superior Court for the
22 State of California, City and County of San Francisco and any other applicable rules of discovery.

23 No incidental or implied admissions of fact by SIGARMS are made by the responses below.
24 The only admissions are express admissions. The fact that SIGARMS has answered any
25 interrogatories may not properly be taken as an admission that respondent accepts or admits the
26 existence of any facts set forth or assumed by such interrogatory, or that such response constitutes
27 admissible evidence. The fact that SIGARMS has answered part of all of any discovery
28 propounded is not intended to, and shall not be, construed as a waiver by respondent of all or any

1 part of an objection by respondent to any interrogatory or any claim or defense. By providing
2 responses to these interrogatories, SIGARMS does not concede that any document referenced in the
3 responses is original, true, accurate, complete or authentic.

4 Defendant SIGARMS makes the following general objections to the Plaintiffs' Special
5 Interrogatories, which are applicable to each interrogatory and incorporated therein. The assertion
6 of the same or additional objections in any particular response to this discovery does not waive the
7 objections set forth below:

8 1. Defendant SIGARMS objects on the grounds that this discovery is intentionally
9 harassing, burdensome and improperly and politically designed to burden the defendant with
10 litigation expense in defending claims that have no legal or factual merit.

11 2. Defendant SIGARMS objects to each and every one of the interrogatories insofar as
12 they are vague and ambiguous, over broad, unduly burdensome and oppressive.

13 3. Defendant SIGARMS objects to Plaintiff's Interrogatories as over broad, unduly
14 burdensome and oppressive insofar as the interrogatories seek "all," "any," and/or "every" bit of
15 information on specified subjects or the identification of every person.

16 4. Defendant SIGARMS objects to Plaintiff's Interrogatories as over broad and not
17 reasonably calculated to lead to the discovery of admissible evidence in so far as they fail to identify
18 any specific firearm distributed by SIGARMS or any specific incident related thereto.

19 5. Plaintiff's Interrogatories are objectionable in that they fail to limit the information
20 requested to a reasonable period of time. SIGARMS' answers will be with respect to the time period
21 from January 1, 1995 to the present.

22 6. Plaintiff's Interrogatories are objectionable in that they seek information that has no
23 relevance to the issues in this case, as framed by Plaintiff's Complaint, nor does the information sought
24 appear reasonably calculated to lead to the discovery of admissible evidence.

25 7. Plaintiff's Interrogatories are objectionable to the extent they seek information of a
26 proprietary and/or competitively sensitive nature, in some instances rising to the level of a trade secret,
27 the disclosure of which would work competitive hardship and injury on SIGARMS.

28

1 8. Plaintiff's Interrogatories are so broad in scope as to seek information privileged from
2 discovery by applicable law, including but not limited to the attorney-client privilege, the accountant
3 client privilege, the work product doctrine, the joint defense privilege, or other applicable privilege or
4 immunity from discovery.

5 9. Defendant SIGARMS objects to this discovery insofar as it seeks information in the
6 public domain and thus equally available to Plaintiffs. Defendant SIGARMS also objects to this
7 discovery to the extent it seeks information within the possession, custody or control of Plaintiffs.

8 10. Defendant SIGARMS objects to this discovery to the extent it assumes facts that are
9 incorrect or do not exist.

10 11. To the extent that any Interrogatory calls for a legal opinion, analysis or
11 determination, SIGARMS objects on the grounds that the Interrogatory calls for a legal conclusion.

12 12. Defendant SIGARMS objects to this discovery to the extent it is vague and
13 ambiguous and makes response impossible without speculation.

14 13. Defendant reserves the right to modify, amend or add to these responses and
15 objections.

16 14. SIGARMS objects to the interrogatories, and each of them, to the extent they seek to
17 impose any obligations greater than those required by the California Code of Civil Procedure,
18 California Civil Code, civil law or common law decisions, and/or any other applicable law
19 governing the scope of discovery, as well as any Court Orders which govern discovery in this
20 action.

21 22 RESPONSES TO INTERROGATORIES

23 Special Interrogatory No. 1:

24 IDENTIFY ALL of YOUR subsidiary, parent and AFFILIATED ENTITIES.

25 Response to Special Interrogatory No. 1:

26 Defendant SIGARMS incorporates by reference its general objections set forth above.
27 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
28 to Interrogatory No. 1 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,

1 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
2 incorporated as if fully set forth herein.

3
4 **Special Interrogatory No. 2:**

5 IDENTIFY ALL of YOUR directors, officers, and other EMPLOYEES in a managerial or
6 supervisory position, excluding ANY clerical EMPLOYEES or support staff.

7 **Response to Special Interrogatory No. 2:**

8 Defendant SIGARMS incorporates by reference its general objections set forth above.
9 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
10 to Interrogatory No. 2 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
11 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
12 incorporated as if fully set forth herein.

13
14 **Special Interrogatory No. 3:**

15 IDENTIFY ALL PERSON(S) that are involved with the DESIGN of YOUR FIREARMS,
16 excluding ANY clerical EMPLOYEES or support staff.

17 **Response to Special Interrogatory No. 3:**

18 Defendant SIGARMS incorporates by reference its general objections set forth above. In
19 addition, defendant SIGARMS objects to this interrogatory on the ground that SIGARMS is
20 neither the designer nor the manufacturer of the firearms that it distributes and therefore, by its
21 terms, this interrogatory is not applicable to SIGARMS. Subject to and without waiving its
22 objections, defendant SIGARMS responds that the persons employed by SIGARMS that would be
23 the most knowledgeable regarding the design of the firearms distributed by SIGARMS would be
24 Joseph Kiesel and Michael Guarnieri.

25
26 **Special Interrogatory No. 4:**

27 IDENTIFY ALL PERSON(S) that are involved with the ADVERTISING and
28 MARKETING of YOUR FIREARMS, excluding ANY clerical EMPLOYEES or support staff.

1 **Response to Special Interrogatory No. 4:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above. In
3 addition, defendant SIGARMS objects to this interrogatory on the ground that it is overbroad.
4 Subject to and without waiving its objections, defendant SIGARMS responds that since 1995
5 SIGARMS has employed the following marketing firms: Rosse' and Associates (advertising) and;
6 Barron & Associates (advertising).

7
8 **Special Interrogatory No. 5:**

9 IDENTIFY ALL PERSON(S) that are involved with the sale and/or DISTRIBUTION of
10 YOUR FIREARMS, excluding ANY clerical EMPLOYEES or support staff.

11 **Response to Special Interrogatory No. 5:**

12 Defendant SIGARMS incorporates by reference its general objections set forth above. In
13 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad.
14 Subject to and without waiving its objections, defendant SIGARMS refers Plaintiffs to the
15 documents to be produced by SIGARMS which provide information regarding employees and
16 others involved in sales and distribution. The persons most knowledgeable at SIGARMS regarding
17 the identity of such persons are Hermann Kloetzer and Laura Burgess.

18
19 **Special Interrogatory No. 6:**

20 IDENTIFY ANY and ALL PERSON(S) and/or ENTITIES that have had an ownership
21 interest in YOU and state the nature of the relationship between YOU and each individual or
22 ENTITY.

23 **Response to Special Interrogatory No. 6:**

24 Defendant SIGARMS incorporates by reference its general objections set forth above.
25 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
26 to Interrogatory No. 6 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
27 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
28 incorporated as if fully set forth herein.

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Special Interrogatory No. 7:

IDENTIFY every EMPLOYEE or other PERSON who has made POLICY DECISIONS regarding the sale and/or DISTRIBUTION OF YOUR FIREARMS for YOU.

Response to Special Interrogatory No. 7:

Defendant SIGARMS incorporates by reference its general objections set forth above. In addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague, ambiguous, overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, defendant SIGARMS responds that the following individuals are most knowledgeable regarding the making of policy decisions regarding distribution on behalf of SIGARMS: Hermann Kloetzer, George Schneider, former CEO of SIGARMS.

Special Interrogatory No. 8:

IDENTIFY ALL experts that have been employed on YOUR behalf RELATING TO litigation in which YOU were involved from 1990 to the present and indicate the substance of their testimony.

Response to Special Interrogatory No. 8:

Defendant SIGARMS incorporates by reference its general objections set forth above. In addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague, ambiguous, overbroad and requests information protected by the attorney client privilege, the work product doctrine and/or the joint defense privilege. Subject to and without waiving its objections, defendant SIGARMS responds that there has been no testimony offered by any expert retained by SIGARMS in any litigated matter during the relevant time period.

Special Interrogatory No. 9:

IDENTIFY ALL of YOUR employees that have been deposed relating to litigation in which YOU were involved from 1980 to the present.

1 **Response to Special Interrogatory No. 9:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above. In
3 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad and
4 unduly burdensome. Subject to and without waiving its objections, defendant SIGARMS responds
5 that, to date, the only deposition testimony of SIGARMS was given by Sy M. Vershon. SIGARMS
6 refers Plaintiffs to the documents produced by SIGARMS for a transcript of this testimony.

7
8 **Special Interrogatory No. 10:**

9 IDENTIFY ALL models of FIREARMS and the quantity of each model
10 MANUFACTURED by YOU and indicate whether they were or are sold (a) in the United States
11 and/or (b) California.

12 **Response to Special Interrogatory No. 10:**

13 Defendant SIGARMS incorporates by reference its general objections set forth above. In
14 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
15 unduly burdensome, seeks confidential and/or proprietary information. SIGARMS further objects to
16 this interrogatory on the ground that SIGARMS is not the manufacturer of the firearms that it
17 distributes and therefore this interrogatory is not applicable to SIGARMS. Subject to and without
18 waiving its objections, defendant SIGARMS responds that documents sufficient to disclose the
19 model and quantity of firearms sold to California entities will be produced.

20
21 **Special Interrogatory No. 11:**

22 IDENTIFY ALL models and the quantity of each FIREARM DISTRIBUTED by YOU.

23 **Response to Special Interrogatory No. 11:**

24 Defendant SIGARMS incorporates by reference its general objections set forth above.
25 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
26 to Interrogatory No. 11 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
27 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
28 incorporated as if fully set forth herein.

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Special Interrogatory No. 12:

IDENTIFY ALL models and the quantity of each FIREARM MANUFACTURED by YOU that were or are sold directly to CONSUMERS in the United States.

Response to Special Interrogatory No. 12:

Defendant SIGARMS incorporates by reference its general objections set forth above. Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response to Interrogatory No. 12 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000, pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is incorporated as if fully set forth herein.

Special Interrogatory No. 13:

IDENTIFY ALL DEALERS and DISTRIBUTORS to whom YOU sell or have sold FIREARMS, including the model and quantity of each FIREARM sold to each such DEALER and DISTRIBUTOR.

Response to Special Interrogatory No. 13:

Defendant SIGARMS incorporates by reference its general objections set forth above. Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response to Interrogatory No. 13 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000, pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is incorporated as if fully set forth herein.

Special Interrogatory No. 14:

IDENTIFY every ENTITY that has MANUFACTURED ANY model of FIREARM or component part thereof for YOU.

Response to Special Interrogatory No. 14:

Defendant SIGARMS incorporates by reference its general objections set forth above and specifically objects to the identification of all component part manufacturers as overly broad,

1 burdensome and not calculated to lead to the discovery of admissible evidence. Subject to and
2 without waiving its objections, defendant SIGARMS responds that the firearms it distributes are
3 manufactured by SIG Arms Sauer GMBH.
4

5 **Special Interrogatory No. 15:**

6 IDENTIFY ALL FIREARM SAFETY FEATURES incorporated into ANY model of
7 FIREARM MANUFACTURED, DISTRIBUTED or sold by or for YOU.

8 **Response to Special Interrogatory No. 15:**

9 Defendant SIGARMS incorporates by reference its general objections set forth above.
10 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
11 to Interrogatory No. 15 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
12 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
13 incorporated as if fully set forth herein.
14

15 **Special Interrogatory No. 16:**

16 IDENTIFY ALL PERSONS or ENTITIES who have participated in ANY
17 COMMUNICATION with YOU concerning the incorporation of FIREARM SAFETY FEATURES
18 into the DESIGN of YOUR FIREARMS.

19 **Response to Special Interrogatory No. 16:**

20 Defendant SIGARMS incorporates by reference its general objections set forth above. In
21 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
22 ambiguous and overbroad. SIGARMS further objects to this interrogatory on the ground that
23 SIGARMS is neither the designer nor the manufacturer of the firearms that it distributes and
24 therefore this interrogatory is not applicable to SIGARMS. SIGARMS also objects to this
25 interrogatory on the ground that the definition of the term "COMMUNICATION" is vague,
26 ambiguous, overbroad and subject to multiple interpretations. Subject to and without waiving its
27 objections, defendant SIGARMS responds that Joseph Kiesel and Michael Guarnieri are the persons
28 most knowledgeable about the subject matter of this interrogatory.

1 **Special Interrogatory No. 17:**

2 IDENTIFY the PERSON most knowledgeable about the FIREARM SAFETY FEATURES
3 of YOUR FIREARMS.

4 **Response to Special Interrogatory No. 17:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above.
6 Subject to and without waiving its objections, defendant SIGARMS refers Plaintiffs to its Response
7 to Special Interrogatory No. 16.

8
9 **Special Interrogatory No. 18:**

10 IDENTIFY ALL AGREEMENTS among ANY two or more FIREARM
11 MANUFACTURERS or DISTRIBUTORS, RELATING TO ANY FIREARM SAFETY FEATURE.

12 **Response to Special Interrogatory No. 18:**

13 Defendant SIGARMS incorporates by reference its general objections set forth above.
14 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
15 to Interrogatory No. 18 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
16 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
17 incorporated as if fully set forth herein.

18
19 **Special Interrogatory No. 19:**

20 IDENTIFY ALL FIREARM SAFETY DEVICES DISTRIBUTED with YOUR
21 FIREARMS.

22 **Response to Special Interrogatory No. 19:**

23 Defendant SIGARMS incorporates by reference its general objections set forth above.
24 Subject to and without waiving its objections, defendant SIGARMS responds that documents
25 reasonably sufficient to disclose this information will be produced.

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1 **Special Interrogatory No. 20:**

2 IDENTIFY ALL FIREARM SAFETY RESEARCH YOU have conducted or that has been
3 conducted on YOUR behalf and the amount of money spent by YOU on such research.

4 **Response to Special Interrogatory No. 20:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above. In
6 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
7 ambiguous, overbroad, and unduly burdensome. SIGARMS further objects to this interrogatory on
8 the ground that SIGARMS is neither the designer nor the manufacturer of the firearms that it
9 distributes and therefore this interrogatory is not applicable to SIGARMS but rather is more
10 appropriately addressed to the designer or manufacturer. SIGARMS also objects to this
11 interrogatory on the ground that the definition of the term "FIREARM SAFETY RESEARCH" is
12 vague, ambiguous and subject to multiple interpretations.

13 Subject to and without waiving its objections, defendant SIGARMS responds that it is
14 neither the designer nor the manufacturer of the handguns it distributes. Principal testing and
15 analysis of design features are performed by the entities responsible for those functions.
16 Nevertheless, SIGARMS at its corporate headquarters in Exeter, New Hampshire has conducted
17 certain testing of handgun products. By means of example, SIGARMS has occasionally assisted
18 the designer and manufacturer in testing designed to evaluate the function and "endurance" on both
19 new and existing models. SIGARMS also test fires each handgun that is assembled in its Exeter,
20 New Hampshire plant. SIGARMS has also participated in other testing conducted in response to a
21 bid from an agency (i.e. law enforcement) as per the relevant agency's requirements. SIGARMS
22 further responds that its accounting system is not designed such that the amount of money spent on
23 such activities may be isolated.

24
25 **Special Interrogatory No. 21:**

26 IDENTIFY the amount of money YOU spent on research and development RELATING TO
27 FIREARM SAFETY FEATURES in each of the past ten years.

28 ///

1 **Response to Special Interrogatory No. 21:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above. In
3 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
4 ambiguous, overbroad and unduly burdensome. SIGARMS further objects to this interrogatory on
5 the ground that SIGARMS is neither the designer nor the manufacturer of the firearms that it
6 distributes and therefore this interrogatory is not applicable to SIGARMS as it is not primarily
7 responsible for research and development for the firearms it distributes. Subject to and without
8 waiving its objections, defendant SIGARMS refers plaintiffs to its Response to Special
9 Interrogatory No. 20.

10
11 **Special Interrogatory No. 22:**

12 State YOUR gross dollar amount of annual sales for FIREARMS for each of the past twenty
13 years, including the gross dollar amount for sales of FIREARM(S) in California and the United
14 States.

15 **Response to Special Interrogatory No. 22:**

16 Defendant SIGARMS incorporates by reference its general objections set forth above. In
17 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
18 unduly burdensome, harassing, not reasonably calculated to lead to the discovery of admissible
19 evidence, seeks confidential and/or proprietary information and seeks irrelevant information.

20
21 **Special Interrogatory No. 23:**

22 State YOUR gross dollar amount of annual sales for HANDGUNS for each of the past
23 twenty years, including the gross dollar amount for sales of HANDGUNS in California and the
24 United States.

25 **Response to Special Interrogatory No. 23:**

26 Defendant SIGARMS incorporates by reference its general objections set forth above. In
27 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
28

1 unduly burdensome, harassing, not reasonably calculated to lead to the discovery of admissible
2 evidence, seeks confidential and/or proprietary information and seeks irrelevant information.

3
4 **Special Interrogatory No. 24:**

5 State YOUR profits for FIREARM sales for each of the past twenty years, including your
6 profits for sales of FIREARMS in California and the United States.

7 **Response to Special Interrogatory No. 24:**

8 Defendant SIGARMS incorporates by reference its general objections set forth above. In
9 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
10 unduly burdensome, harassing, not reasonably calculated to lead to the discovery of admissible
11 evidence, seeks confidential and/or proprietary information and seeks irrelevant information.

12
13 **Special Interrogatory No. 25:**

14 State YOUR, profits for HANDGUN sales for each of the past twenty years, including your
15 profits for sales of HANDGUNS in California and the United States.

16 **Response to Special Interrogatory No. 25:**

17 Defendant SIGARMS incorporates by reference its general objections set forth above. In
18 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
19 unduly burdensome, harassing, not reasonably calculated to lead to the discovery of admissible
20 evidence, seeks confidential and/or proprietary information and seeks irrelevant information.

21
22 **Special Interrogatory No. 26:**

23 IDENTIFY ALL COMMUNICATIONS between YOU and the Hunting and Shooting
24 Sports Heritage Foundation, the National Shooting Sports Foundation, the American Shooting
25 Sports Council, the Sporting Arms and Ammunition Manufacturers' Institute and/or the National
26 Rifle Association, or any of its representatives, employees, agents or assigns.

27 **Response to Special Interrogatory No. 26:**
28

1 Defendant SIGARMS incorporates by reference its general objections set forth above. In
2 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
3 unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and
4 seeks irrelevant information. SIGARMS also objects to this interrogatory on the ground that the
5 definition of the term "COMMUNICATIONS" is vague, ambiguous, overbroad and subject to
6 multiple interpretations. Subject to and without waiving its objections, defendant SIGARMS
7 responds that documents, if any, reasonably responsive to this Interrogatory will be produced.
8

9 **Special Interrogatory No. 27:**

10 IDENTIFY the amount of money YOU spent on the TESTING of each model of YOUR
11 FIREARMS in each of the past ten years.

12 **Response to Special Interrogatory No. 27:**

13 Defendant SIGARMS incorporates by reference its general objections set forth above. In
14 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
15 ambiguous, overbroad, and unduly burdensome. SIGARMS further objects to this interrogatory on
16 the ground that SIGARMS is neither the designer nor the manufacturer of the firearms that it
17 distributes and therefore this interrogatory is not applicable to SIGARMS but rather is more
18 appropriately addressed to the designer or manufacturer. SIGARMS also objects to this
19 interrogatory on the ground that the definition of the term "TESTING" is vague, ambiguous,
20 overbroad and subject to multiple interpretations. Subject to and without waiving its objections,
21 SIGARMS refers Plaintiffs to its Response to Special Interrogatory No. 20.
22

23 **Special Interrogatory No. 28:**

24 IDENTIFY ALL WARNINGS on and DISTRIBUTED with each model of YOUR
25 FIREARM.

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1 **Response to Special Interrogatory No. 28:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above.
3 Subject to and without waiving its objections, SIGARMS responds that documents sufficient to
4 disclose this information will be produced.

5
6 **Special Interrogatory No. 29:**

7 IDENTIFY every patent or other technology right acquired by YOU RELATING TO ANY
8 FIREARM SAFETY FEATURE, including a CHAMBER LOADED INDICATOR and
9 PERSONALIZED GUN SYSTEM.

10 **Response to Special Interrogatory No. 29:**

11 Defendant SIGARMS incorporates by reference its general objections set forth above. In
12 addition, defendant SIGARMS objects to this interrogatory on the grounds that SIGARMS is
13 neither the designer nor the manufacturer of the firearms that it distributes. Subject to and without
14 waiving its objections, defendant SIGARMS responds that it is neither the designer nor the
15 manufacturer of the firearms that it distributes and does not hold any patents with respect to the
16 firearms that it distributes.

17
18 **Special Interrogatory No. 30:**

19 IDENTIFY ANY COMMUNICATION between or including YOU and ANY FIREARM
20 SAFETY FEATURE MANUFACTURER, DISTRIBUTOR or DESIGNER, including, but not
21 limited to the following ENTITIES or PERSONS: (1) Saf T Lock, Inc., (2) STL Lock, Inc., (3)
22 Frank W. Brooks, (4) Jeffrey W. Brooks, or (5) Saf-T-Lok products, (6) Saf-T-Hammer Corp., (7)
23 Mitchell Saltz, (8) Sandy Price, (9) Jed Perry, or (10) Saf-T-Hammer products, (11) Robert Allan or
24 (12) Intraloc products, (13) Tamhelm Supply Co., Inc., (14) Ricky Devold, or (15) Magna-Trigger
25 products, (16) Oxford Micro Devices, Inc. or (17). the A236 Video Digital Signal Processor Chip,
26 (18) Colt's Manufacturing Co.'s and (19) the National Institute of Justice's or Sandia's "smart gun"
27 project, (20) Keepin Guns Safe, Inc. or (21) Keepin Systems, Inc., (22) Terry James or (23)
28 Auto-Lok products, (24) Life Saver Gun Safety Device, Inc. or (25) Richard Hicklee,, (26) Jerry

1 Cunningham, (27) RAM Enterprises, Inc. or (28) Will McKay, (29) Nova Technologies, Inc., (30)
2 Savage & Associates or (31) Kent Savage, (32) Advanced Patent Services, Inc., (33) Teddy
3 Jacobsen, (34) Don Horton, (35) Fulton Arms, Inc. or (36) Kenneth Pugh, (37) Sandia National
4 Laboratories, (38) Smartlinks or (39) William Phillips, (40) Cognitive Systems or (41) Don
5 Lombardi, (42) James Barker, (43) Edward Cartwright, (44) Joseph Smith, (45) Henry Orenstein,
6 (46) Edward Centille, (47) Frank Pachmayr, (48) Alpo Karkkainen, (49) Jerome Lemelson, (50)
7 Robert Wallerstein, (51) Frederic Shaw, (52) James Heltzel, (53) Dean Decarlo, (54) Earl
8 Wilkinson, (55) Gary Mayhak, (56) Ockert Oncke, (57) Sarel Van der Merwe, (58) Jerry Justice,
9 (59) Larry Eppler, (60) John Martin, (61) Jerome Enget, (62) Michael Honey, (63) Kendall
10 Osborne, (64) Richard Ruston, (65) Robert Nosler, (66) William Lewis, (67) Jerry Harthcock, (68)
11 Kenneth Bowes, (69) Joseph McCarthy, (70) Peter Hochstein, (71) Dean Mumbleau, (72) Craig
12 Mumbleau, (73) Vincente Novak, (75) Amir Fard, (76) James Teetzel, (77) Guy Winer, (78) Emeric
13 Bennett, (79) Frank Thomas, or ANY of their agents or EMPLOYEES.

14 **Response to Special Interrogatory No. 30:**

15 Defendant SIGARMS incorporates by reference its general objections set forth above. In
16 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
17 unduly burdensome, oppressive and harassing. Subject to and without waiving its objections,
18 defendant SIGARMS responds that documents, if any, responsive to this Interrogatory will be
19 produced.

20
21 **Special Interrogatory No. 31:**

22 IDENTIFY ALL FIREARM SAFETY FEATURES that YOU CONSIDERED in
23 conjunction with the MANUFACTURE or DESIGN of YOUR FIREARMS.

24 **Response to Special Interrogatory No. 31:**

25 Defendant SIGARMS incorporates by reference its general objections set forth above. In
26 addition, defendant SIGARMS objects to this interrogatory on the ground that SIGARMS is neither
27 the designer nor the manufacturer of the firearms that it distributes and therefore this interrogatory
28 is not applicable to SIGARMS.

1 **Special Interrogatory No. 32:**

2 IDENTIFY ALL FIREARM SAFETY FEATURES in YOUR FIREARMS which are
3 intended to prevent UNINTENTIONAL DISCHARGE(S).

4 **Response to Special Interrogatory No. 32:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above. In
6 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad.
7 Subject to and without waiving its objections, defendant SIGARMS responds that documents
8 reasonably sufficient to disclose this information will be produced.

9
10 **Special Interrogatory No. 33:**

11 IDENTIFY ALL INCIDENTS, including COMPLAINTS, RELATING TO YOUR
12 FIREARMS, including UNINTENTIONAL DISCHARGES.

13 **Response to Special Interrogatory No. 33:**

14 Defendant SIGARMS incorporates by reference its general objections set forth above. In
15 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
16 ambiguous, overbroad, not reasonably calculated to lead to the discovery of admissible evidence
17 and seeks irrelevant information. Subject to and without waiving its objections, defendant
18 SIGARMS responds that it is not aware of any complaints of unintentional discharges in the State
19 of California from January 1, 1995 to the present.

20
21 **Special Interrogatory No. 34:**

22 IDENTIFY EVERY PERSON or ENTITY responsible for responding to the INCIDENTS
23 AND COMPLAINTS RELATING TO YOUR FIREARMS, including those for
24 UNINTENTIONAL DISCHARGES.

25 **Response to Special Interrogatory No. 34:**

26 Defendant SIGARMS incorporates by reference its general objections set forth above.
27 Subject to and without waiving its objections, SIGARMS refers Plaintiffs to its Response to Special
28 Interrogatory No. 33. SIGARMS further responds that the person most knowledgeable at

1 SIGARMS with respect to communications from consumers or other purchasers of their firearms
2 regarding performance or operation of a SIGARMS firearm would be Joseph Kiesel and Michael
3 Guarnieri.

4
5 **Special Interrogatory No. 35:**

6 IDENTIFY ALL INCIDENTS of which YOU are aware in which an INAPPROPRIATE
7 USER gained access to a FIREARM.

8 **Response to Special Interrogatory No. 35:**

9 Defendant SIGARMS incorporates by reference its general objections set forth above. In
10 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague and
11 ambiguous. SIGARMS also objects to this interrogatory on the ground that the definition of term
12 "INAPPROPRIATE USER" is vague, ambiguous and subject to multiple interpretations. Subject to
13 and without waiving its objections, defendant SIGARMS responds that is generally aware that
14 persons not entitled under federal or state law to own or possess a firearm have done so subjecting
15 them to criminal prosecution and penalty. SIGARMS is not aware of the particulars of any such
16 illegal possession of a firearm within the state of California of any firearm that SIGARMS
17 distributed.

18
19 **Special Interrogatory No. 36:**

20 IDENTIFY ALL INCIDENTS of which YOU are aware in which an INAPPROPRIATE
21 USER DISCHARGED one of YOUR FIREARM(S).

22 **Response to Special Interrogatory No. 36:**

23 Defendant SIGARMS incorporates by reference its general objections set forth above. In
24 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague and
25 ambiguous. SIGARMS also objects to this interrogatory on the ground that the definition of term
26 "INAPPROPRIATE USER" is vague, ambiguous and subject to multiple interpretations. Subject to
27 and without waiving its objections, defendant SIGARMS refers plaintiffs to its Response to Special
28 Interrogatory No. 35.

1 **Special Interrogatory No. 37:**

2 IDENTIFY ALL INCIDENTS of which YOU are aware in which a PERSON
3 DISCHARGED one of YOUR FIREARM(S) which that PERSON believed to be unloaded or
4 otherwise unable to DISCHARGE.

5 **Response to Special Interrogatory No. 37:**

6 Defendant SIGARMS incorporates by reference its general objections set forth above. In
7 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague and
8 ambiguous. Subject to and without waiving its objections, defendant SIGARMS responds that is
9 unaware of any such incidents in California during the relevant time period.

10
11 **Special Interrogatory No. 38:**

12 IDENTIFY ALL FIREARM(S) DESIGNED, MANUFACTURED, DISTRIBUTED or
13 SOLD by YOU that have a CHAMBER LOADED INDICATOR.

14 **Response to Special Interrogatory No. 38:**

15 Defendant SIGARMS incorporates by reference its general objections set forth above. In
16 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague and
17 ambiguous. SIGARMS further objects to this interrogatory on the ground that SIGARMS is neither
18 the designer nor the manufacturer of the firearms that it distributes. Subject to and without waiving
19 its objections, defendant SIGARMS responds that the instruction and warning manuals
20 accompanying each of the firearms products it distributes dictates that every gun should be treated
21 as if it were loaded. SIGARMS warning and instructional literature further specifies that safe
22 firearms handling practices require that in order to determine whether any pistol is loaded, the
23 firearm must be visually and physically checked to ensure that the magazine is removed and the
24 barrel and chamber are empty. Reliance on any external feature of a pistol to determine whether it
25 is loaded is not consistent with safe handling practices. SIGARMS further responds that the
26 following models offered for sale in California have an external chamber loaded indicators on them:
27 SIG P230, SIG P232 and the M2 Mauser. The SIGARMS warning and instructional literature

28

1 accompanying these firearms nonetheless instruct that the foregoing safe handling practices be
2 followed to determine whether the firearm is loaded.

3
4 **Special Interrogatory No. 39:**

5 IDENTIFY ALL FIREARMS that you know, or have reason to believe, incorporate a
6 PERSONALIZED GUN SYSTEM, including ANY DESIGNED or MANUFACTURED by YOU.

7 **Response to Special Interrogatory No. 39:**

8 Defendant SIGARMS incorporates by reference its general objections set forth above. In
9 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
10 ambiguous, overbroad and unduly burdensome. SIGARMS further objects to this interrogatory on
11 the ground that SIGARMS is neither the designer nor the manufacturer of the firearms that it
12 distributes and therefore this interrogatory is not applicable to SIGARMS. SIGARMS also objects
13 to this interrogatory on the ground that the definition of the term "PERSONALIZED GUN
14 SYSTEM" as it is vague, ambiguous and subject to multiple interpretations. SIGARMS further
15 objects to this interrogatory to the extent that it seeks information pertaining to firearms not
16 distributed by SIGARMS – such information is equally accessible to Plaintiffs as to SIGARMS.
17 Subject to and without waiving its objections, defendant SIGARMS responds that all of the firearms
18 that it distributes are sold with trigger locks and lockable boxes. Moreover, SIGARMS has offered
19 for sale firearms equipped with an EPLS system, the particulars of which are set forth in product
20 literature which will be produced.

21
22 **Special Interrogatory No. 40:**

23 IDENTIFY ALL PERSON(S) or ENTITIES that you know, or have reason to believe are
24 DESIGNING or MANUFACTURING a PERSONALIZED GUN SYSTEM.

25 **Response to Special Interrogatory No. 40:**

26 Defendant SIGARMS incorporates by reference its general objections set forth above. In
27 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
28 ambiguous, overbroad and unduly burdensome. SIGARMS further objects to this interrogatory on

1 the ground that SIGARMS is neither the designer nor the manufacturer of the firearms that it
2 distributes and therefore this interrogatory is not applicable to SIGARMS. SIGARMS also objects
3 to this interrogatory on the ground that the definition of the term "PERSONALIZED GUN
4 SYSTEM" as it is vague, ambiguous and subject to multiple interpretations. SIGARMS further
5 objects to this interrogatory to the extent that it seeks information pertaining to firearms not
6 distributed by SIGARMS – such information is equally accessible to Plaintiffs as to SIGARMS.
7 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its Response
8 to Special Interrogatory No. 39 and further responds that it has no personal knowledge regarding
9 which other persons or entities, if any, are currently designing or manufacturing a personalized gun
10 system.

11
12 **Special Interrogatory No. 41:**

13 IDENTIFY the PERSON(S) and/or ENTITY(IES) in possession of ALL DESIGN
14 specifications for each model of FIREARM MANUFACTURED by YOU.

15 **Response to Special Interrogatory No. 41:**

16 Defendant SIGARMS incorporates by reference its general objections set forth above. In
17 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is premature,
18 vague, ambiguous, overbroad and seeks confidential and/or proprietary information. SIGARMS
19 further objects to this interrogatory on the ground that SIGARMS is neither the designer nor the
20 manufacturer of the firearms that it distributes and therefore this interrogatory is not applicable to
21 SIGARMS. Subject to and without waiving its objections, defendant SIGARMS responds that SIG
22 Arms Sauer GMBH and/or SIG Arms AG would be the entities most likely in possession of such
23 information.

24
25 **Special Interrogatory No. 42:**

26 If YOU contend that it is not feasible to manufacture a PERSONALIZED GUN SYSTEM
27 for YOUR FIREARMS, state ALL facts upon which YOU base any such contention.

28 ////

1 **Response to Special Interrogatory No. 42:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above. In
3 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
4 ambiguous, overbroad and assumes facts not in evidence and fails to identify the particular system
5 plaintiffs have in mind rendering a focused and meaningful response impossible. Subject to and
6 without waiving its objections, SIGARMS refers plaintiffs to its Response to Special Interrogatory
7 No. 39.

8
9 **Special Interrogatory No. 43:**

10 IDENTIFY the PERSON(S) responsible for responding to this set of interrogatories.

11 **Response to Special Interrogatory No. 43:**

12 Defendant SIGARMS incorporates by reference its general objections set forth above.
13 Subject to and without waiving its objections, defendant SIGARMS responds that this set of
14 interrogatories were prepared by Abbey Miles of SIGARMS along with counsel to SIGARMS,
15 Wilson, Elser, Moskowitz, Edelman & Dicker LLP.

16
17 **Special Interrogatory No. 44:**

18 State YOUR DOCUMENT retention and destruction policy or policies.

19 **Response to Special Interrogatory No. 44:**

20 Defendant SIGARMS incorporates by reference its general objections set forth above. In
21 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
22 ambiguous, overbroad, unduly burdensome and not limited in scope. Subject to and without
23 waiving these objections, SIGARMS states that it does not have a formal "document retention and
24 destruction policy or policies". Persons most knowledgeable with regard to the documents
25 maintained in any particular department at SIGARMS are the department heads.

26 ////

27 ////

28 ////

1 **Special Interrogatory No. 45:**

2 IDENTIFY every ASSOCIATION of which YOU, a director, officer, or management level
3 EMPLOYEE of YOURS were or have been a member.

4 **Response to Special Interrogatory No. 45:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above. In
6 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
7 unduly burdensome and seeks irrelevant information. Furthermore, SIGARMS objects to this
8 interrogatory because it seeks protected information under the First Amendment and the *Noerr-*
9 *Pennington* doctrine. Subject to and without waiving its objections, SIGARMS responds that one
10 or more of its employees may have been involved with the following organizations on behalf of
11 SIGARMS:

- 12 1. Wildlife Management Institute
- 13 2. National Shooting Sports Foundation
- 14 3. Sporting Arms & Ammunition Manufacturer's Institute
- 15 4. Mass. Chiefs of Police Association
- 16 5. American Shooting Sports Council, Inc.
- 17 6. Non-Powder Gun Products Association
- 18 7. NASGW, Inc.
- 19 8. AWSDA
- 20 9. NDIA
- 21 10. NAPED
- 22 11. IALEFI, Inc.
- 23 12. Outdoor Writer's Association

24
25 ////

26 ////

27 ////

28 ////

1 **Special Interrogatory No. 46:**

2 IDENTIFY every ASSOCIATION to which YOU, a director, officer, or management level
3 EMPLOYEE of YOURS has provided ANY FINANCIAL SUPPORT including the amount,
4 purposes, and dates of ALL such support.

5 **Response to Special Interrogatory No. 46:**

6 Defendant SIGARMS incorporates by reference its general objections set forth above. In
7 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
8 unduly burdensome and seeks irrelevant information. Furthermore, SIGARMS objects to this
9 interrogatory because it seeks protected information under the First Amendment and the *Noerr-*
10 *Pennington* doctrine. Subject to and without waiving its objections, SIGARMS refers plaintiffs to
11 its Response to Interrogatory No. 45.

12
13 **Special Interrogatory No. 47:**

14 IDENTIFY ANY STANDARD to which YOU adhere or use as a guideline in
15 MANUFACTURING, DESIGNING, DISTRIBUTING, IMPORTING and/or selling FIREARMS.

16 **Response to Special Interrogatory No. 47:**

17 Defendant SIGARMS incorporates by reference its general objections set forth above. In
18 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
19 ambiguous, overbroad and unduly burdensome. This request purports to require identification of
20 thousands of federal, state and local laws and regulations governing the conduct of SIGARMS
21 business. It also requests SIGARMS who is not the manufacturer or designer of the firearms it sells
22 to identify all manufacturing/design specifications.

23
24 **Special Interrogatory No. 48:**

25 IDENTIFY every LICENSE obtained by YOU from a government ENTITY for the
26 MANUFACTURE, DISTRIBUTION, sale, and/or importation of FIREARMS.

27 ////

28 ////

1 **Response to Special Interrogatory No. 48:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above. In
3 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad.
4 SIGARMS further objects to this interrogatory on the ground that SIGARMS is not the
5 manufacturer of the firearms that it distributes and therefore this interrogatory is not applicable to
6 SIGARMS to the extent that it deals with manufacturing. Subject to and without waiving its
7 objections, defendant SIGARMS responds that it has the following licenses:

- 8 1. Type 08 FFL for importing firearms 6-02-008-08-3A-33243 (exp. 1/1/03) issued by
9 the BATF;
- 10 2. Type 07 FFL for manufacturing firearms 6-02-008-07-1G-33244 (exp. 1/1/2001)
11 issued by the BATF;
- 12 3. Special Tax Stamp Type 61 (NFA Firearms Importer) Control #2000192-N53-004 (exp.
13 6/30/01) issued by the BATF;
- 14 4. ATF Form 6 Application and Permit: SIGARMS routinely submits approximately 200
15 of these permit applications each year. This type of permit authorizes us to import
16 firearms and accessories from customers outside the United States. [ABBEY HAS
17 CREATED A DATABASE TO TRACK THESE PERMITS, UNFORTUNATELY, IT
18 ONLY GOES FROM LATE 97 FORWARD];
- 19 5. Registration Code 0302-3615 (exp. 03/02) issued by the US Department of State, Office
20 of Defense Trade Controls. This authorizes SIGARMS to apply for export licenses.
21 (FORM #'S: DSP-5; DSP-61; DSP-73; DSP-85 AND DSP-119). SIGARMS routinely
22 applies for approximately 100 of such export licenses per year; and
- 23 6. Importer of US Munitions List Articles (BATF) Registration #A-61-319-1221 (exp.
24 12/21/2001).

25
26 **Special Interrogatory No. 49:**

27 IDENTIFY ALL of YOUR FIREARMS that have been the subject of a TRACE.

28 ////

1 **Response to Special Interrogatory No. 49:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above.
3 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
4 to Interrogatory No. 49 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
5 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
6 incorporated as if fully set forth herein.

7
8 **Special Interrogatory No. 50:**

9 IDENTIFY ANY LAW ENFORCEMENT PERSON(S) who has visited any place of
10 YOUR business including the date and purpose of such visit(s).

11 **Response to Special Interrogatory No. 50:**

12 Defendant SIGARMS incorporates by reference its general objections set forth above. In
13 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is overbroad,
14 unduly burdensome, oppressive, harassing and seeks irrelevant information. Subject to and without
15 waiving its objections, defendant SIGARMS responds that SIGARMS often offers training for law
16 enforcement personnel at its facilities, including training at the SIGARMS Academy. SIGARMS
17 further responds that law enforcement personnel may visit SIGARMS facilities in connection with
18 the marketing and sale of SIGARMS product. SIGARMS responds that the BATF has also had
19 occasion to visit its facilities in connection with routine compliance audits/inspections.

20
21 **Special Interrogatory No. 51:**

22 IDENTIFY the PERSON(s) or ENTITY most knowledgeable about YOUR FIREARM
23 DISTRIBUTION practices.

24 **Response to Special Interrogatory No. 51:**

25 Defendant SIGARMS incorporates by reference its general objections set forth above.
26 Subject to and without waiving any of its objections, SIGARMS responds that the person most
27 knowledgeable with respect to SIGARMS distribution practices is Hermann Kloetzer.

28 ////

1 **Special Interrogatory No. 52:**

2 IDENTIFY the PERSON(s) or ENTITIES most knowledgeable about YOUR FIREARM
3 sales.

4 **Response to Special Interrogatory No. 52:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above.
6 Subject to and without waiving any of its objections, SIGARMS responds that the person most
7 knowledgeable with respect to SIGARMS distribution practices is Hermann Kloetzer.

8
9 **Special Interrogatory No. 53:**

10 IDENTIFY any FIREARM(S) MANUFACTURED, DISTRIBUTED, DESIGNED
11 imported, or sold by YOU that have been BANNED anywhere in the United States.

12 **Response to Special Interrogatory No. 53:**

13 Defendant SIGARMS incorporates by reference its general objections set forth above. In
14 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is argumentative,
15 harassing, not reasonably calculated to lead to the discovery of admissible evidence and seeks
16 irrelevant information. SIGARMS further objects to this interrogatory on the ground that
17 SIGARMS is neither the designer nor the manufacturer of the firearms that it distributes and
18 therefore this interrogatory is not entirely applicable to SIGARMS. SIGARMS also objects to this
19 interrogatory on the ground that the definition of the term "BANNED" is vague, ambiguous,
20 overbroad, argumentative and subject to multiple interpretations. Subject to and without waiving its
21 objections, defendant SIGARMS responds that the Series 551 Assault Rifle distributed by
22 SIGARMS solely to law enforcement agencies are not offered for sale to the general public.
23 SIGARMS further responds that other models of pistols distributed by SIGARMS are offered for
24 sale to law enforcement agencies equipped with a magazine that holds more than 10 rounds of
25 ammunition. Such models are offered for sale solely to law enforcement agencies and are not made
26 available for sale to the public.

27 ///

28 ///

1 **Special Interrogatory No. 54:**

2 IDENTIFY ALL TRAINING or INSTRUCTION provided by YOU to EMPLOYEE(S) or
3 other PERSONS who sell or DISTRIBUTE YOUR FIREARMS.

4 **Response to Special Interrogatory No. 54:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above. In
6 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
7 ambiguous, overbroad, not reasonably calculated to lead to the discovery of admissible evidence
8 and seeks irrelevant information. Subject to and without waiving its objections, defendant
9 SIGARMS responds that Hermann Kloetzer is the employee at SIGARMS most knowledgeable
10 regarding training and instruction available to persons who sell SIGARMS firearms. SIGARMS
11 further refers plaintiffs to documents produced regarding this subject matter.
12

13 **Special Interrogatory No. 55:**

14 IDENTIFY ALL TRAINING or INSTRUCTION provided by YOU to CONSUMER(S) or
15 other PERSON(S) who purchase, other than for resale, ANY FIREARMS MANUFACTURED or
16 DISTRIBUTED by YOU.

17 **Response to Special Interrogatory No. 55:**

18 Defendant SIGARMS incorporates by reference its general objections set forth above. In
19 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
20 ambiguous, overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of
21 admissible evidence and seeks irrelevant information and requests information. Subject to and
22 without waiving its objections, defendant SIGARMS responds that each gun sold or distributed
23 comes with a product manual containing warnings and instructions. SIGARMS further responds
24 that the SIGARMS Academy is available to all consumers and purchasers of its firearms.
25 SIGARMS further refers plaintiffs to documents produced concerning this subject matter.

26 ////

27 ////

28 ////

1 **Special Interrogatory No. 56:**

2 IDENTIFY ALL requirements that a PERSON or ENTITY must satisfy in order to purchase
3 a FIREARM from YOU.

4 **Response to Special Interrogatory No. 56:**

5 Defendant SIGARMS incorporates by reference its general objections set forth above.
6 Subject to and without waiving its objections, defendant SIGARMS refers plaintiffs to its response
7 to Interrogatory No. 56 found in defendant SIGARMS letter to plaintiffs, dated February 4, 2000,
8 pertaining to Defendant SIGARMS responses to Plaintiffs' limited requests for discovery which is
9 incorporated as if fully set forth herein.

10
11 **Special Interrogatory No. 57:**

12 IDENTIFY ALL requirements that a PERSON or ENTITY must satisfy to become a
13 DISTRIBUTOR or DEALER of YOUR FIREARMS.

14 **Response to Special Interrogatory No. 57:**

15 Defendant SIGARMS incorporates by reference its general objections set forth above. In
16 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
17 ambiguous, overbroad and seeks irrelevant information. Subject to and without waiving its
18 objections, defendant SIGARMS responds that it only sells its firearms to a relatively small number
19 of independently federally licensed distributors with whom it has longstanding business
20 relationships. SIGARMS further refers plaintiffs to its distribution agreements with distributors
21 which will be produced.

22
23 **Special Interrogatory No. 58:**

24 IDENTIFY ALL TRAINING or INSTRUCTION provided by YOU to DISTRIBUTORS,
25 DEALERS, ENTITIES or other PERSONS who purchase for resale ANY FIREARMS
26 MANUFACTURED or DISTRIBUTED by YOU.

27 ////

28 ////

1 **Response to Special Interrogatory No. 58:**

2 Defendant SIGARMS incorporates by reference its general objections set forth above.
3 Subject to and without waiving its objections, defendant SIGARMS refers Plaintiffs to its Response
4 to Special Interrogatory No. 54.

5
6 **Special interrogatory No. 59:**

7 IDENTIFY ALL PERSONS and/or ENTITIES, if ANY, that YOU have DISCIPLINED
8 with respect to the sale and/or DISTRIBUTION of YOUR FIREARMS, including IDENTIFYING
9 ANY disciplinary steps taken by YOU.

10 **Response to Special Interrogatory No. 59:**

11 Defendant SIGARMS incorporates by reference its general objections set forth above. In
12 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
13 ambiguous, overbroad and seeks irrelevant information. SIGARMS further objects to plaintiffs'
14 interrogatories directed at SIGARMS' distribution practices in their entirety until such time, if ever,
15 as plaintiffs can place those distribution practices at issue. Subject to and without waiving its
16 objections, SIGARMS responds that it sells firearms to a relatively small number of independently
17 federally licensed wholesale distributors: By reason of their status as Federal Firearms Licensees,
18 these independent authorized distributors have been approved and licensed by the BATF and
19 remain under the BATF's investigative and law enforcement authority. SIGARMS further responds
20 that documents, if any, responsive to this request will be produced.

21
22 **Special Interrogatory No. 60:**

23 IDENTIFY every PERSON or EMPLOYEE that has gone to the locations of YOUR
24 DISTRIBUTORS or DEALERS to SUPERVISE them in the last ten years.

25 **Response to Special Interrogatory No. 60:**

26 Defendant SIGARMS incorporates by reference its general objections set forth above. In
27 addition, defendant SIGARMS specifically objects to the term "supervise" on the grounds that it is
28 vague, ambiguous and argumentative.

1 **Special Interrogatory No. 61:**

2 IDENTIFY ANY COMMUNICATION between or among ANY PERSON(S) or
3 ENTITIES, in which YOU participated or which YOU are or were aware, RELATING TO
4 compliance or non-compliance with laws or regulations relating to FIREARM sales,
5 MANUFACTURE, and/or DISTRIBUTION.

6 **Response to Special Interrogatory No. 61:**

7 Defendant SIGARMS incorporates by reference its general objections set forth above. In
8 addition, defendant SIGARMS objects to this interrogatory on the grounds that it is vague,
9 ambiguous, overbroad, unduly burdensome, oppressive and harassing.

10

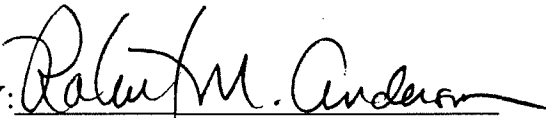
11 Dated: November 13, 2000

12

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

13

14

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SERVICE LIST
FIREARMS CASES, San Diego Superior Court, Proceeding No. 4095
WEMED File No. 00132.00076
Revised: November 13, 2000

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