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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

Coordination Proceeding Special Title  
(Rule 1550(b)),

FIREARMS CASES,

Including actions:

*People, et al. v. Arcadia Machine & Tool,  
Inc., et al* (Superior Court of City & County  
of San Francisco, No. 303753)

*People, et al. v. Arcadia Machine & Tool,  
Inc., et al.* (Superior Court of the County of  
Los Angeles, No. BC210894)

*People, et al. v. Arcadia Machine & Tool,  
Inc., et al.* (Superior Court of the County  
of Los Angeles, No. BC210894)

JUDICIAL COUNCIL  
COORDINATION PROCEEDING NO. 4095

**DECLARATION OF KRISTINE POPLAWSKI  
FOR ADDITIONAL DISCOVERY**

Hearing Judge: Hon. Vincent P. DiFiglia  
Date Filed: May 25, 1999

6/21/02

1 I, Kristine A. Poplawski, declare:

2 1. I am one of the attorney representing Plaintiffs, the People of the State of California in  
3 this action.

4 2. I am propounding Plaintiffs' Second Set of Special Interrogatories to Defendants  
5 Arcadia Machine & Tool, Inc.; Beretta U.S.A. Corp.; Browning Arms Co.; Bryco Arms Co.;  
6 Carl Walther GmbH; Charter Arms, Inc.; China North Industries; Davis Industries, Inc.; Excel  
7 Industries, Inc.; Forjas Taurus, S.A.; Glock, Inc.; H & R 1871, Inc.; Heckler & Koch, Inc.; Hi-  
8 Point Firearms; Kel-Tec CNC Industries, Inc.; Lorcin Engineering, Inc.; Navegar, Inc.; North  
9 American Arms, Inc.; Phoenix Arms; Fabbrica Pietro Beretta Sp.A.; S.W. Daniels, Inc.; Sig  
10 Arms, Inc.; Smith & Wesson Corp.; Sturm Ruger & Co.; Sundance Industries, Inc.; Taurus  
11 International Manufacturing, Inc., consisting of 19 special interrogatories; and Plaintiffs' Second  
12 Set of Special Interrogatories to Defendants Andrews Sporting Goods, Inc.; B & B Group; B & E  
13 Guns; Hawthorne Distributors; S.G. Distributing, Inc.; B.L. Jennings, Inc.; Ellett Brothers, Inc.;  
14 International Armament Corp.; MKS Supply, Inc.; National Gun Sales, Inc.; Southern Ohio Gun  
15 Distributors; Traders Sports, Inc., consisting of 14 special interrogatories.

16 3. These two sets of interrogatories will cause the total number of specially prepared  
17 interrogatories propounded to the parties to whom they are directed to exceed the number of  
18 specially prepared interrogatories permitted by paragraph (1) of subdivision (c) of § 2030 of the  
19 California Code of Civil Procedure.

20 4. I am familiar with the issues in this case.

21 5. This number of questions is warranted under paragraph (2) of subdivision (c) of §  
22 2030 of the California Code of Civil Procedure because of (1) the complexity and the quantity of  
23 the existing and potential issues in this case, and (2) the expedience of using this method of  
24 discovery to provide to the responding party the opportunity to conduct an inquiry, investigation,  
25 or search of files or records to supply the information sought.

26 6. None of the questions in this set of interrogatories is being propounded for any  
27 improper purpose, such as to harass the party or the attorney of the party, to whom it is directed,  
28 or to cause unnecessary delay or needless increase in the cost of litigation.

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct, and that this declaration was executed on June 21, 2002 in the  
3 County of San Francisco, California.

4  
5 /s/ Kristine A. Poplawski  
6 Kristine A. Poplawski  
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(*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

1. That I am and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested in the within action; that my business address is 401 B Street. Suite 1700, San Diego, California 92101.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of June, 2002, at San Diego, California.

/s/ Natalee Gratt  
Natalee Gratt