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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

THE PEOPLE OF THE STATE OF CALIFORNIA'S FIRST SET OF  
SPECIAL INTERROGATORIES TO DEFENDANT CARL WALTHER GmbH

8/4/00

1 PROPOUNDING PARTIES: THE PEOPLE OF THE STATE OF CALIFORNIA, ET AL.

2 RESPONDING PARTY: DEFENDANT CARL WALTHER GmbH

3 SET NUMBER: ONE

4 Plaintiffs, the People of the State of California, et al., hereby request, pursuant to Code of  
5 Civil Procedure §2030(c)(1), that defendant Carl Walther GmbH respond to the following  
6 interrogatories, separately and fully, in writing and under oath, within 30 days after service of this  
7 request.

8 **I. INSTRUCTIONS**

9 1. Whenever necessary to bring within the scope of an interrogatory any matter that  
10 might otherwise be construed to be outside its scope, (a) the use of a verb in any tense shall be  
11 construed as the use of that verb in all other tenses; (b) the use of a word in its singular form shall  
12 be construed as the use of the plural form as well; (c) the use of a word in its plural form shall be  
13 construed as the use of the singular form as well; and (d) "and" and "or" shall be construed either  
14 disjunctively or conjunctively.

15 2. Except when express reference is made to another paragraph, subparagraph, clause,  
16 or word, each paragraph, subparagraph, clause, and word herein shall be construed independently  
17 and not by reference to any other paragraph, subparagraph, clause, or word herein for purposes of  
18 limitation.

19 3. If you object to an interrogatory in whole or in part on the ground of attorney-client,  
20 work-product, or other privilege or protection, you shall provide the following as to each  
21 interrogatory or part thereof to which objection is made: (a) the specific privilege or protection  
22 asserted; (b) the subject matter of the information not produced; (c) the form in which that  
23 information is contained (*e.g.*, a document or the recollection of one or more individuals); and (d)  
24 the identity of every person who is or was ever privy to the information. In addition, where the  
25 objection is based on work-product doctrine, defendant shall: (a) state the basis for the contention  
26 that the document was prepared in anticipation of litigation; (b) identify the litigation in anticipation  
27 of which the document was prepared; and (c) state the date the document was created or prepared.

28

1           4.     If you object to a portion of an interrogatory or to providing a portion of the  
2 information responsive to an interrogatory, you shall respond to the portion of the request or produce  
3 the portion of the responsive information as to which you have no objection.

4           5.     If you are unable to respond fully and completely to any interrogatory, answer to the  
5 extent possible, and specify the reason for defendant's inability to answer the remainder and the  
6 efforts made by defendant or its counsel to supply a complete answer.

7 **II.    DEFINITIONS**

8           The use of the singular form of any word includes the plural and vice versa. The following  
9 definitions shall apply to the terms used in every request in this entire set and to this section of  
10 definitions:

11           1.     The terms "ADVERTISEMENT" and "ADVERTISEMENTS" shall mean and refer  
12 to ANY written, oral, visual, audible, or electronic communication which markets, promotes,  
13 informs, emphasizes, or encourages interest in a product, including, but not limited to, promotional  
14 materials, catalogs, brochures, web-sites, mailings, television advertisements, radio advertisements,  
15 and print advertisements.

16           2.     The term "ADVERTISING" is used in the broadest sense to include MARKETING,  
17 promoting, making known, drawing attention to, or encouraging interest in a product, whether in  
18 written, oral, or ANY other form, and whether directed at a distributor, dealer, consumer, or ANY  
19 other person.

20           3.     The term "AFFILIATED ENTITIES" shall mean and refer to companies that are  
21 related by the following, including, but not limited to, common investors, common ownership,  
22 officers, or directors, owned by the same holding company, a purchase of assets or liabilities of a  
23 company, or a parent or subsidiary company.

24           4.     The term "AGREEMENT" shall mean and refer to an arrangement, understanding,  
25 consenting, meeting of the minds, in harmony or accord or to accede.

26           5.     The term "ALL" shall mean ANY and ALL.

27           6.     The term "AND" shall be understood to mean "OR" and vice versa whenever such  
28 construction results in a broader request for information.

- 1           7.       The term "ANY" shall mean ANY and ALL.
- 2           8.       The term "ATF" shall mean and refer to the Bureau of Alcohol, Tobacco and  
3 FIREARMS of the United States Department of the Treasury.
- 4           9.       The terms "COMMUNICATION" and "COMMUNICATIONS" shall mean and refer  
5 to ANY kind of written, oral, visual, audible, electronic transfer, mail or exchange of information,  
6 thoughts, or ideas, or ANY request for the transfer or exchange of such information, including, but  
7 not limited to, making, sending, or receiving information via or by way of electronic mail messages,  
8 facsimiles, inquiries, letters, mail, ADVERTISEMENTS, MARKETING promotions, memoranda,  
9 packages, pages, presentations, press releases, proposals, public statements, sales pitches,  
10 solicitations, speaking, conversations, speeches, telephone calls, telephone messages, testimony,  
11 voice-mail messages or writings.
- 12          10.       The terms "DEALER" and "DEALERS" shall mean and refer to: (a) any person or  
13 entity engaged in the business of selling firearms at wholesale or retail; (b) any person or entity  
14 engaged in the business of repairing firearms or of making or fitting special barrels, stocks, or trigger  
15 mechanisms to firearms; or (c) any person or entity whose business or occupation includes the taking  
16 or receiving, by way of pledge or pawn, of any firearm as security for the payment or repayment of  
17 money.
- 18          11.       The terms "DESIGN(S)" and "DESIGNED" shall mean and refer to composed,  
19 designed, constructed or created the original or subsequent blue prints, drawings, plans, sketches,  
20 simulations or schematics of YOUR FIREARM.
- 21          12.       The term "DISCIPLINED" shall mean and refer to any disciplinary action taken  
22 including termination, suspension, counseling, criticizing, barring, banning, probation or prohibition.
- 23          13.       The terms "DISCHARGE," "DISCHARGES" and "DISCHARGED" shall mean and  
24 refer to ANY shooting, emitting, dislodging, or evacuating, and includes, but is not limited to, the  
25 firing of a slug or projectile from a FIREARM.
- 26          14.       The terms "DISTRIBUTED" or "DISTRIBUTION" shall mean and refer to sold,  
27 distributed or shipped.
- 28

1           15.     The terms "DISTRIBUTOR" and "DISTRIBUTORS" shall mean and refer to ANY  
2 person or ENTITY other than YOU who sells, transfers, distributes, or assigns FIREARMS or  
3 accessories, including, but not limited to, federal FIREARM(S) licensees.

4           16.     The terms "DOCUMENT" and "DOCUMENTS" shall have the broadest meaning  
5 permissible pursuant to the California Evidence Code and the California Code of Civil Procedure  
6 and includes, without limitation, ANY writing or electronically stored data, defined by California  
7 Evidence Code §250 as:

8           [H]andwriting, typewriting, printing, photostating, photographing, and every other  
9 means of recording upon any tangible thing any form of communication or  
10 representation, including letters, words, pictures, sounds, or symbols, or  
11 combinations thereof.

12           If a document was prepared in several copies, or if additional copies were thereafter made, and if  
13 ANY such copies were not identical or are no longer identical by reason of notation or modification  
14 of ANY kind whatsoever, including, without limitation, notations on the front or back of ANY pages  
15 thereof, then each such copy must be produced.

16           17.     The terms "EMPLOYEE" AND "EMPLOYEES" shall mean and refer to ANY person  
17 currently in the employ of, or at ANY time employed by YOU, or who purported to act on YOUR  
18 behalf, including, but not limited to, ALL past and present directors, officers, executives, managers,  
19 accountants, agents, representatives, attorneys, contractors, subcontractors, advisors, servants,  
20 temporary personnel, outside salespersons, and consultants.

21           18.     The terms "ENTITY" and "ENTITIES" shall mean and refer to ANY individual  
22 person or separate and distinct business forms, including but not limited to, sole-proprietorships,  
23 partnerships, corporations, joint ventures, subsidiaries, parent companies, management companies,  
24 contractors or consultants.

25           19.     The term "EVERY" means ANY and ALL.

26           20.     The terms "FIREARM" and "FIREARMS" shall mean and refer to: (a) ANY weapon  
27 which will or is designed to or may readily be converted to expel a projectile by the action of an  
28 explosive; (b) the frame or receiver of ANY such weapon; or (c) ANY device for silencing, muffling,  
or diminishing the report of a FIREARM, including ANY combination or parts, designed or

1 redesigned, or intended for use in assembling or fabricating a FIREARM silencer or FIREARM  
2 muffler, or ANY part intended only for use in such assembly or fabrication.

3         21. The terms "FIREARM SAFETY FEATURE" and "FIREARM SAFETY  
4 FEATURES" shall mean and refer to ANY external or internal DESIGN, device, part, or accessory,  
5 whether or not ever implemented, intended, or proposed, to improve the safety of a FIREARM or  
6 to prevent or reduce ANY FIREARM safety risk, including, but not limited to, ANY DESIGN,  
7 device, part, or accessory intended or proposed to do ANY of the following: (a) to prevent or reduce  
8 the likelihood of an unintentional shooting or unintentional firing; (b) to prevent or reduce the  
9 likelihood of unauthorized use of a FIREARM; (c) to prevent or reduce the likelihood of a  
10 FIREARM firing when the magazine is unloaded or removed; (d) to alert a user that a round of  
11 ammunition is in the firing chamber of a FIREARM; (e) to make it more difficult for a child or other  
12 unauthorized user to fire a FIREARM; or (f) to facilitate or assist in safe and secure storage of a  
13 FIREARM.

14         22. The terms "HANDGUN" and "HANDGUNS" shall mean and refer to: (a) a  
15 FIREARM which has a short stock and is designed to be held and fired by the use of a single hand;  
16 or (b) ANY combination of parts from which such a FIREARM can be assembled.

17         23. The term "IDENTIFY," with respect to an ADVERTISEMENT or promotional  
18 material, shall mean to set forth the following:

19                 (a) The inclusive dates of such ADVERTISEMENT or promotion;

20                 (b) The type of ADVERTISEMENT or promotion, (e.g., journal advertisements,  
21 television, brochure, trade magazine or publication, etc.);

22                 (c) The content or substance of the ADVERTISEMENT or promotion;

23                 (d) The publication disseminating, publishing or carrying such  
24 ADVERTISEMENT or promotional material;

25                 (e) The names and addresses of ALL persons that assisted in the formulation or  
26 preparation of said ADVERTISEMENT or promotional materials; and

27                 (f) The names and addresses of the persons having custody and control of these  
28 original written ADVERTISEMENTS or promotional materials and/or copies thereof.

1           24.    The terms "IDENTIFY" or "IDENTIFICATION," when referring to a DOCUMENT,  
2 shall request the following information about the document:

- 3                   (a)    The author or originator of the document;
- 4                   (b)    Every person to whom the document was sent or transferred;
- 5                   (c)    The date on which the document was created;
- 6                   (d)    Each date on which it was sent or transferred;
- 7                   (e)    The type of document (*e.g.*, letter, memorandum, chart, etc.);
- 8                   (f)    A detailed description of the matter, nature, substance, and content of the  
9 document;
- 10                  (g)    The present location and present custodian of the document, or the date on  
11 which the document was lost, discarded, destroyed, altered, or relinquished from defendant's  
12 possession, custody, or control.

13           In lieu of identifying a document pursuant to this instruction, YOU may produce the  
14 document pursuant to plaintiffs' First Request for Production of Documents: describe said document  
15 with sufficient particularity such that a formal request for production may be made.

16           25.    The term "IDENTIFY," with respect to an ENTITY, shall mean to set forth the  
17 following:

- 18                   (a)    The full legal name of the ENTITY;
- 19                   (b)    If the ENTITY is a business form, state the type of business, partnership,  
20 corporation or joint venture;
- 21                   (c)    If the ENTITY is a business, the states in which the ENTITY is licensed to  
22 do business;
- 23                   (d)    The current or last known business address and phone number of such persons  
24 or businesses including the principal place of business and jurisdiction of incorporation;
- 25                   (e)    The agent who can accept service for the ENTITY.

26           26.    The term "IDENTIFY," with respect to a FIREARM(s), shall mean to set forth the  
27 following:

- 28                   (a)    State the make, model, and serial number of the FIREARM;

1 (b) State the pertinent dates including the date it was MANUFACTURED, sold,  
2 distributed, or traced;

3 (c) State the person to whom YOU sold the FIREARM; and

4 (d) State the person who designed the original model of the FIREARM and ALL  
5 major modifications to the FIREARM.

6 27. The term "IDENTIFY," with respect to an INSTRUCTION(s), shall mean to set forth  
7 the following:

8 (a) Describe in detail ALL literature identifying the form and substance of the  
9 INSTRUCTION(s);

10 (b) Whether or not such literature was affixed to YOUR FIREARM(S) or  
11 ACCESSORIES; and

12 (c) If so, on what part of YOUR FIREARM(S) or ACCESSORIES such literature  
13 was to be affixed.

14 28. The term "IDENTIFY," with respect to an INCIDENT or COMPLAINT, shall mean  
15 to set forth the following:

16 (a) The state and court in which a lawsuit(s) was filed;

17 (b) The docket number;

18 (c) The specific product involved;

19 (d) The type of action, (e.g., personal injury, wrongful death, etc.);

20 (e) The name, address, and telephone number of ALL parties and their attorneys;

21 (f) The current status of the case, (e.g., pretrial, judgment for plaintiff, appeal,  
22 etc.); and

23 (g) The injuries claimed.

24 29. The term "IDENTIFY," with respect to a LICENSE, shall mean to set forth the  
25 following:

26 (a) State the license name, date it was issued, ENTITY issuing the LICENSE;

27 (b) State whether the LICENSE has ever been revoked, suspended, barred or  
28 terminated; and

1 (c) State whether ANY request by YOU for such a LICENSE was denied.

2 30. The terms "IDENTIFY" and "IDENTIFIES" when referring to a PERSON shall  
3 require the following information about the person:

- 4 (a) Full name;
- 5 (b) Every alias by which the person was known at ANY time;
- 6 (c) Current or last known home and business address;
- 7 (d) Current or last known job title or description;
- 8 (e) Each employer of the person during the period of time covered by the answer  
9 referring to such person; and
- 10 (f) Each job title or description of the person during the period of time covered  
11 by the answer referring to such person.

12 31. The term "IDENTIFY," with respect to FIREARM SAFETY FEATURES, shall mean  
13 to set forth the following:

- 14 (a) State the name of the safety feature, the person that designed or developed the  
15 safety feature;
- 16 (b) State the date that the safety feature was incorporated into the FIREARM(s);
- 17 (c) State the model FIREARM that the FIREARM SAFETY FEATURE was  
18 incorporated into; and
- 19 (d) State the cost of the FIREARM SAFETY FEATURE.

20 32. The term "IDENTIFY," with respect to TESTING, shall mean to set forth the  
21 following:

- 22 (a) The name and address of each ENTITY and/or person performing or  
23 participating in the TESTING process;
- 24 (b) The inclusive dates of each occurrence of said TESTING;
- 25 (c) The purpose of the TESTING;
- 26 (d) The nature of the TESTING;
- 27 (e) At what stage of the manufacturing process TESTING occurred;
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1 (f) Whether the TESTING revealed ANY defects, deficiencies, or problems with  
2 YOUR FIREARM(S);

3 (g) The nature of each said defect, deficiency, and/or problem; and

4 (h) The name, address, telephone number, and job title of each person who  
5 prepared written reports regarding the results of TESTING, and the person who now has custody of  
6 such reports.

7 33. The term "IDENTIFY," with respect to a WARNING, shall mean to set forth the  
8 following:

9 (a) The form, substance, and location of each such WARNING;

10 (b) The reason for said WARNING;

11 (c) The contents of the WARNING; and

12 (d) Whether or not the risk or event warned of had occurred previously in  
13 conjunction with use of YOUR FIREARM(S) or accessories.

14 34. The term "INAPPROPRIATE USER" shall mean and refer to ANY person whose  
15 purchase of a FIREARM would violate a federal, state, or local law, regulation or ordinance.

16 35. The term "INCIDENT" shall mean and refer to ANY happening, occurrence, event  
17 episode, incident, disturbance RELATING TO the DISCHARGE of a FIREARM.

18 36. The term "INSTRUCTION" shall mean and refer to ANY directions, specifications,  
19 requirements or DOCUMENT(S) that tell or show the user of a FIREARM how the product is  
20 intended or designed to be used.

21 37. The term "INVOLVED" shall mean and refer to involved, related to, affecting,  
22 implicated, committed, occupied or employed.

23 38. The term "JOINTLY" shall mean and refer to the act of working in a common, or  
24 shared, or united activity with another person or entity.

25 39. The term "LAW ENFORCEMENT" refers to ANY federal, state, or local agency,  
26 personnel or official engaged in the detection, investigation, or prosecution of ANY violation of law.

27 40. The term "LICENSE(S)" shall mean or refer to ANY right, license, permission,  
28 permissive use, AGREEMENT, or permit.

1           41.    The term "MANUFACTURE" or "MANUFACTURED" shall mean and refer to  
2 made, sold, designed or distributed.

3           42.    The term "MARKETING" shall mean and refer to ANY method used by YOU to  
4 promote the sale of YOUR FIREARMS or accessories, whether the sale is to a distributor or to the  
5 ultimate consumer, including, but not limited to, ADVERTISEMENTS, catalogs, packages, displays,  
6 brochures, and direct sale solicitations.

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8           43.    The term "OR" shall be understood to mean "AND" and vice versa whenever such  
9 construction results in a broader request for information.

10          44.    The terms "PERSON" or "PERSONS" shall mean natural persons including  
11 employees of YOU, private corporations, governmental ENTITIES, partnerships, associations, and  
12 joint ventures.

13          45.    The terms "PERTAINING TO," "RELATING TO," "RELATED," "RELATED TO,"  
14 "RELATES TO," "REGARDING," "REFERRING TO," OR "CONCERNING" are used in the  
15 broadest sense to mean in ANY way, whether directly or indirectly, involving, concerning, relating  
16 to, referring to, being appropriate for, considering, underlying, modifying, amending, confirming,  
17 endorsing, evidencing, representing, supporting, qualifying, terminating, revoking, canceling, or  
18 negating.

19          46.    The term "SUPERVISE" shall mean and refer to monitoring, supervising, watching,  
20 oversight, management, direction, holding accountable to, or regulates.

21          47.    The terms "TRACE," "TRACING," OR "TRACE REQUESTS" shall mean and refer  
22 to ANY inquires or requests by law enforcement for information about a FIREARM purchase, sale,  
23 or other transaction involving a FIREARM, including, but not limited to those conducted by the  
24 Bureau of Alcohol, Tobacco and Firearms.

25          48.    The term "TRAINING" shall mean and refer to any instruction, direction, help,  
26 guidance, teaching, practice, workshop, education, schooling, counseling, training, supervision or  
27 tutelage.

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1           49.     The terms "UNINTENTIONAL FIRING," "UNINTENTIONAL DISCHARGE," OR  
2 "UNINTENTIONAL SHOOTING" shall mean and refer to ANY DISCHARGE from a FIREARM  
3 that is not intended by the person in possession of the FIREARM.

4           50.     The terms "YOU" and "YOUR" shall mean and refer to YOUR corporate ENTITY,  
5 and ANY of its accountants, ADVERTISING agencies, advisors, affiliates, agents, attorneys,  
6 consultants, directors, divisions, employees, foreign parent companies, foreign subsidiaries,  
7 insurance companies, investigators, joint ventures, managing agents, MARKETING firms, officers,  
8 parents, predecessors, predecessor's partners, representatives, servants, subsidiaries, or successors,  
9 as well as ANY other person or ENTITY acting on YOUR behalf. The terms "YOU," and "YOUR"  
10 shall also include the accountants, ADVERTISING agencies, advisors, affiliates, agents, attorneys,  
11 consultants, directors, divisions, employees, insurance companies, investigators, joint ventures,  
12 managing agents, MARKETING firms, officers, parents, predecessors, predecessor's partners,  
13 representatives, servants, subsidiaries, or successors of ANY of YOUR foreign subsidiaries and/or  
14 foreign parent companies, as well as ANY other person or ENTITY acting on behalf of ANY of  
15 YOUR foreign subsidiaries and/or foreign parent companies.

16 **III.    RELEVANT TIME PERIOD**

17           Except as otherwise specified, the time period encompassed by these interrogatories is  
18 January 1, 1990 to the present.

19 **IV.    INTERROGATORIES**

20 SPECIAL INTERROGATORY NO. 1:

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

22 SPECIAL INTERROGATORY NO. 2:

23           IDENTIFY ALL of YOUR directors, officers, and other EMPLOYEES in a managerial OR  
24 supervisory position, excluding ANY clerical EMPLOYEES OR support staff.

25 SPECIAL INTERROGATORY NO. 3:

26           IDENTIFY ALL PERSONS that are involved with the ADVERTISING AND MARKETING  
27 of YOUR FIREARMS, excluding ANY clerical EMPLOYEES OR support staff.

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1 SPECIAL INTERROGATORY NO. 4:

2 IDENTIFY ALL PERSONS that are involved with the sale AND DISTRIBUTION of YOUR  
3 FIREARMS, excluding ANY clerical EMPLOYEES OR support staff.

4 SPECIAL INTERROGATORY NO. 5:

5 IDENTIFY ALL DEALERS and DISTRIBUTORS to whom YOU sell OR have sold  
6 FIREARMS, including, but not limited to, International Armament Corporation, d/b/a Interarms, and  
7 Carl Walther USA LLC.

8 SPECIAL INTERROGATORY NO. 6:

9 IDENTIFY ALL ENTITIES with whom YOU have JOINTLY MANUFACTURED  
10 FIREARMS OR ANY component part of a FIREARM, including, but not limited to, the SW99  
11 pistol.

12 SPECIAL INTERROGATORY NO. 7:

13 IDENTIFY ALL INCIDENTS of which YOU are aware in which ANY INAPPROPRIATE  
14 USER, within the State of California, gained access to ANY FIREARM manufactured by YOU.

15 SPECIAL INTERROGATORY NO. 8:

16 IDENTIFY ALL INCIDENTS of which YOU are aware in which an INAPPROPRIATE  
17 USER, within the State of California, DISCHARGED ANY FIREARM manufactured by YOU.

18 SPECIAL INTERROGATORY NO. 9:

19 IDENTIFY ALL INCIDENTS of which YOU are aware of ANY UNINTENTIONAL  
20 DISCHARGE, within the State of California, of ANY firearm manufactured by YOU.

21 SPECIAL INTERROGATORY NO. 10:

22 IDENTIFY ALL INCIDENTS of which YOU are aware in which a resident of the State of  
23 California was injured OR killed by the use of ANY FIREARM manufactured by YOU.

24 SPECIAL INTERROGATORY NO. 11:

25 IDENTIFY every LICENSE obtained by YOU from the State of California for the  
26 MANUFACTURE, DISTRIBUTION, sale, OR importation of FIREARMS.

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1 SPECIAL INTERROGATORY NO. 12:

2 IDENTIFY ALL FIREARMS manufactured by YOU which have been the subject of ANY  
3 ATF TRACE REQUEST for ANY INCIDENT which occurred within the State of California.

4 SPECIAL INTERROGATORY NO. 13:

5 IDENTIFY ALL FIREARMS that YOU have manufactured specifically for the United States  
6 market.

7 SPECIAL INTERROGATORY NO. 14:

8 IDENTIFY the PERSONS most knowledgeable about the DISTRIBUTION of FIREARMS  
9 manufactured by YOU.

10 SPECIAL INTERROGATORY NO. 15:

11 IDENTIFY the PERSONS most knowledgeable about the sale of FIREARMS manufactured  
12 by YOU.

13 SPECIAL INTERROGATORY NO. 16:

14 IDENTIFY ALL TRAINING or INSTRUCTION YOU provide to DISTRIBUTORS,  
15 DEALERS, ENTITIES OR other PERSONS who purchase FIREARMS, within the State of  
16 California, MANUFACTURED by YOU.

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1 SPECIAL INTERROGATORY NO. 17:

2 IDENTIFY ALL movies, films, AND television programs shown within the United States  
3 in which ANY FIREARM OR replica of ANY FIREARM manufactured by YOU was displayed,  
4 mentioned, OR used.

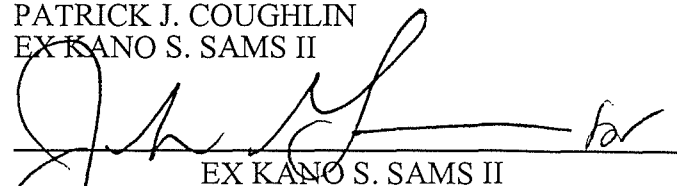
5 DATED: August 4, 2000

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DECLARATION OF SERVICE BY MAIL


I, the undersigned, declare:

1. That declarant is 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 interest in the within action; that declarant's business address is 600 West Broadway, Suite 1800, San Diego, California 92101.

2. That on August 4, 2000, declarant served THE PEOPLE OF THE STATE OF CALIFORNIA'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANT CARL WALTHER GmbH by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List. Declarant also served the parties indicated by facsimile.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of August, 2000, at San Diego, California.

  
June P. Ito

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INDEX TO DISCOVERY

Plaintiff/Defendant

People \_\_\_\_\_ v. Arcadia \_\_\_\_\_

CASE NO: 4095 \_\_\_\_\_

T•M CASE NO: \_\_\_\_\_

PACKAGE 1 OF \_\_\_\_\_

TAB NO.	DATE	FILED BY	DOCUMENT
1	4-1-99		Deposition of Jonathan Westbrook
2	11-1-99	▲	B.L. Jennings first set of requests for production of documents
3	12-3-99	II	Plaintiff's response to first set of requests for production
4	1-31-00	▲	Phoenix Arms response to supplemental interrogatories
5	1-31-00	▲	Bryco Arms response to special request for production of documents
6	1-31-00	▲	B.L. Jennings response to special request for production of documents
7	1-31-00	▲	Bryco Arms response to special interrogatories
8	2-3-00		Proof of service
9	2-27-00	▲	B.L. Jennings response to special request for production of documents
10	2-27-00	▲	B.L. Jennings response to special interrogatories
11	2-29-00	▲	Supplemental response to request to produce
12	3-2-00	▲	Supplemental response to request for production, set one
13	3-3-00	▲	Supplemental response to interrogatories
14	3-6-00	▲	Supplemental response to interrogatories
15			
16			
17			
18			
19			
20			
21			
22			