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

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

) JUDICIAL COUNCIL COORDINATION  
) PROCEEDING NO. 4095

12 FIREARMS CASE

) San Francisco Superior Court No. 303753  
) Los Angeles Superior Court No. BC210894  
) Los Angeles Superior Court No. BC214794

13 Including actions:

14 People, et. al. v. Arcadia Machine & Tool, Inc., et.  
15 al.

) **DECLARATION OF LAWRENCE J.  
KOUNS IN SUPPORT OF  
DEFENDANTS' SUPPLEMENTAL  
REQUEST FOR JUDICIAL NOTICE**

16 People, et. al. v. Arcadia Machine & Tool, Inc., et.  
17 al.

) [C.C.P. § 430.70, Ev. Code § 452(b)-(c),  
C.R.C. § 323(b)]

18 People, et. al. v. Arcadia Machine & Tool, Inc., et.  
al.

) Hon. Vincent P. DiFiglia

) Date: September 15, 2000

) Time: 1:00 p.m.

) Dept: 65

) Trial Date: None Set

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23 I, Lawrence J. Kouns, declare and state as follows:

24 1. I am a partner with the law firm Luce, Forward, Hamilton & Scripps LLP and am  
25 an attorney for defendant Sturm, Ruger & Company, Inc. in this action. I am also co-liaison  
26 counsel for the defendant manufacturers. I make this declaration in support of Defendants'  
27 Supplemental Request for Judicial Notice of certain matters relevant to Defendants' consolidated

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1 demurrers. I have personal knowledge of the facts stated herein, and if called as a witness, could  
2 and would testify to the following matters.

3 2. Attached to the Supplemental Notice of Lodgment as Exhibit 4 is a true and correct  
4 excerpt (pages 22-23) of a publication by the Bureau of Alcohol, Tobacco and Firearms,  
5 Department of Treasury, entitled "Commerce and Firearms in the United States."

6 3. Attached to the Supplemental Notice of Lodgment as Exhibit 5 is a true and correct  
7 copy of an ordinance proposed for the City of San Francisco on or about August 21, 2000.

8 I declare under penalty of perjury under the laws of the State of California that the  
9 foregoing is true and correct.

10  
11  
12 Dated: September 8, 2000

  
\_\_\_\_\_  
LAWRENCE J. KOUNS