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

11 Coordination Proceeding JUDICIAL COUNCIL COORDINATION Special Title (Rule 1550 (b)) PROCEEDING NO. 4095 12 FIREARMS CASE San Francisco Superior Court No. 303753 13 Los Angeles Superior Court No. BC210894 Including actions: Los Angeles Superior Court No. BC214794 14 People, et. al. v. Arcadia Machine & Tool, Inc., et. DECLARATION OF LAWRENCE J. 15 KOUNS IN SUPPORT OF DEFENDANTS' SUPPLEMENTAL People, et. al. v. Arcadia Machine & Tool, Inc., et. 16 REQUEST FOR JUDICIAL NOTICE 17 [C.C.P. § 430.70, Ev. Code § 452(b)-(c), People, et. al. v. Arcadia Machine & Tool, Inc., et. C.R.C. § 323(b)] 18 Hon. Vincent P. DiFiglia 19 Date: September 15, 2000 20 Time: 1:00 p.m. Dept: 65 21 Trial Date: None Set

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

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

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

- 2. Attached to the Supplemental Notice of Lodgment as Exhibit 4 is a true and correct excerpt (pages 22-23) of a publication by the Bureau of Alcohol, Tobacco and Firearms,

 Department of Treasury, entitled "Commerce and Firearms in the United States."
- 3. Attached to the Supplemental Notice of Lodgment as Exhibit 5 is a true and correct copy of an ordinance proposed for the City of San Francisco on or about August 21, 2000.

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

Dated: September 2000

LAWRENCE J. KOUNS

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