

1 SEDGWICK, DETERT, MORAN & ARNOLD  
NICHOLAS W. HELDT (Bar No. 083601)  
2 DIANE T. GORCZYCA (Bar No. 201203)  
One Embarcadero Center, 16th Floor  
3 San Francisco, CA 94111-3628  
Telephone: (415) 781-7900  
4 Facsimile: (415) 781-2635

5 Attorneys for Defendant  
RSR WHOLESale GUNS, INC.  
6  
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES  
10

11 THE PEOPLE OF THE STATE OF  
CALIFORNIA, et al., )

12 Plaintiffs, )

13 vs. )

14 ARCADIA MACHINE & TOOL, et al., )

15 Defendants. )  
16

CASE NO. BC 214794

**JOINDER IN MOTION FOR  
PERMISSION TO FILE COORDINATION  
PETITION**

Date: October 4, 1999  
Time: 8:30 a.m.  
Dept.: 1

Date of Filing: August 6, 1999  
Trial Date: None Set

17  
18 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

19 PLEASE TAKE NOTICE THAT Defendant RSR WHOLESale GUNS, INC.  
20 hereby joins in BERETTA U.S.A. CORP.'s Motion for Permission to File a Coordination  
21 Petition with the Judicial Council. This Joinder is based upon the fact that the below-listed  
22 matter involves substantially similar questions of law and fact to those present herein.

- 23 1. *People of the State of California, et al. v. Arcadia Machine & Tool,*  
24 *Inc., et al.* (San Francisco County Superior Court Case No. 303753).

25 Coordination of these actions would allow the Court to better control this  
26 litigation for the convenience of parties, witnesses and counsel, more efficiently utilize judicial  
27 facilities and resources, eliminate duplicative or inconsistent rulings; orders or judgments, help  
28 alleviate the congested calendar of this Court; and/or promote overall judicial efficiency and

SEDGWICK,  
DETERT, MORAN  
& ARNOLD

One Embarcadero Center  
Sixteenth Floor  
San Francisco, California  
94111-3628  
Tel. 415.781.7900

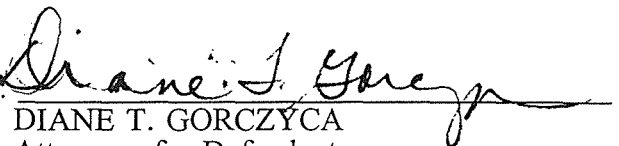
1 fairness.

2 This Motion is of prime importance to this joining party, as the same issues of  
3 law or fact involve all Defendants. It is vital that uniformity of decisions of law in this State  
4 be obtained as said actions are pending in different courts and multiple appeals could be  
5 avoided by a single determination.

6  
7 DATED: September 29, 1999

Respectfully submitted,

8 SEDGWICK, DETERT, MORAN & ARNOLD

9  
10 By:   
11 DIANE T. GORCZYCA  
12 Attorneys for Defendant  
13 RSR WHOLESALE GUNS, INC.  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28  
SEDGWICK,  
DETERT, MORAN  
& ARNOLD

One Embarcadero Center  
Sixteenth Floor  
San Francisco, California  
94111-3628  
Tel. 415.781.7900

1 The People of the State of California, et al. v. Arcadia Machine & Tool, Inc., et al.  
2 Los Angeles County Superior Court; BC214794

3 **PROOF OF SERVICE**

4 I am a resident of the State of California, over the age of eighteen years, and not a  
5 party to the within action. My business address is Sedgwick, Detert, Moran & Arnold, One  
6 Embarcadero Center, 16th Floor, San Francisco, California 94111-3628. On September 29,  
1999, I served the within documents:

7 **JOINDER IN MOTION FOR PERMISSION TO FILE COORDINATION PETITION**

8 ☐

by transmitting via facsimile the document(s) listed above to the fax number(s)  
set forth below on this date before 5:00 p.m.

9 ☒

10 by placing the document(s) listed above in a sealed envelope with postage thereon  
fully prepaid, in the United States mail at San Francisco, California addressed as  
set forth below.

11 ☐

12 by causing personal delivery by \_\_\_\_\_ of the document(s) listed above to  
the person(s) at the address(es) set forth below.

13 ☐

14 by personally delivering the document(s) listed above to the person(s) at the  
address(es) set forth below.

15 ☐

16 by overnight courier of the document(s) listed above to the person(s) at the  
address(es) set forth below.

17 Lloyd W. Pellman  
Lawrence B. Launer  
Lawrence Lee Hafetz  
18 Los Angeles County Counsel's Office  
500 West Temple Street, Suite 648  
19 Los Angeles, CA 90012

Plaintiff - The People of the State of California

20 Richard M. Heimann  
Robert J. Nelson  
21 Lieff, Cabraser, Heimann & Bernstein  
275 Battery Street, 30th Floor  
22 San Francisco, CA 94111-9333

Plaintiff - County of Los Angeles

23 Patrick J. Coughlin  
Michael J. Dowd  
24 Milberg Weiss Bershad Hynes & Lerach  
600 W. Broadway, Suite 1800  
25 San Diego, CA 92101

Plaintiff - County of Los Angeles

26 Richard S. Lewis  
Cohen, Milstein, Hausfeld & Toll, PLLC  
27 West Tower, Suite 500  
1100 New York Avenue, N.W.  
28 Washington, DC 20005

Plaintiff

SEDGWICK,  
DETERT, MORAN  
& ARNOLD

One Embarcadero Center  
Sixteenth Floor  
San Francisco, California  
94111-3628  
Tel. 415.781.7900

1	Dennis A. Henigan	Plaintiff - Of Counsel
	Brian J. Siebel	
2	Jonathan E. Lowy	
	Center to Prevent Handgun Violence	
3	1225 Eye Street, N.W., Suite 1100	
	Washington, DC 2005	
4		
	David R. Gross	Defendant - Southern Ohio Gun Distributors
5	Budd, Larner, Gross, Rosenbaum,	
	Greenbert & Sade	
6	150 John F. Kennedy Parkway	
	Short Hills, NJ 07078	
7		
	James R. Branit	Defendant - Navegar
8	Bullaro & Carton Chartered	
	200 N. LaSalle Street, Suite 2500	
9	Chicago, IL 60601	
10	Timothy G. Atwood, Esq.	Defendants - International Armament
	273 Canal Street	Corporation, dba Interarms Industries, Inc.
11	Sheldon, CT 06484	
12	Robert M. Anderson	Defendant - Sigarms
	Wilson, Elser, Moskowitz, Edelman &	
13	Dicker, LLP	
	1055 W. 7th Street, Suite 2700	
14	Los Angeles, CA 90017-2503	
15	Lawrence S. Greenwald	Defendants - Beretta U.S.A., Inc.; Pietro Beretta,
	Gordon, Feinblatt, Rothman, Hoffbergfer	Sp.A
16	& Hollander, LLC	
	The Garrett Building	
17	233 East Redwood Street	
	Baltimore, MD 21202-3332	
18		
	John F. Rensulli	Defendants - Kel-Tec CNC Industries, Inc.;
19	Christopher P. Orland	Glock, Inc.; Hi-Point Firearms; H&R 1871, Inc.
	Leonard S. Rosenbaum	
20	John J. McCarthy, III	
	Rensulli & Rutherford	
21	300 East 42nd Street	
	New York, NY 10017-5947	
22		
	James P. Dorr	Defendants - Smith & Wesson; Sturm Ruger &
23	Anne G. Kimball	Co.
	Wildman, Harold, et al.	
24	225 W. Wacker Drive	
	Chicago, IL 60606	
25		
	Anne E. Cohen	Defendant - Remington Arms
26	Bruce P. Keller	
	Debevoise & Plimpton	
27	875 Third Avenue	
	New York, NY 10022	
28		

- 1 Charles L. Coleman, III Defendant - Heckler & Hock, Inc.  
Holland & Knight  
2 44 Montgomery Street  
San Francisco, CA 94104
- 3 Thomas E. Fennell Defendant - Colts Manufacturing Company, Inc.  
4 Jones, Day, Reavis & Pogue  
2300 Trammell Crow Center  
5 2001 Ross Avenue  
Dallas, TX 72501
- 6 Robert Klonoff Defendant - Colt's Manufacturing Company  
7 Jones, Day, Reavis & Pogue  
51 Louisiana Avenue, N.W.  
8 Washington, DC 20001-2113
- 9 Bradley Beckman Defendant - North American Arms, Inc.  
Beckman & Associates  
10 1601 Market Street, Suite 2330  
Philadelphia, PA 19103
- 11 William M. Griffin, III Defendants - Arms Technology, Inc.; Browning;  
12 Friday, Eldredge & Clark Winchester  
2000 First Commercial Building  
13 400 West Captiol Avenue  
Little Rock, AR 72201-3493
- 14 Douglas Kliever Defendants - National Shooting Sports  
15 Cleary, Gottlieb, Steen & Hamilton Foundation, Inc.; Ammunition Manufacturers'  
2000 Pennsylvania Avenue, N.W., 9th Flr. Institute, Inc.  
16 Washington, DC 20006
- 17 Richard Mayberry Defendant - American Shooting Sports Counsel,  
Mayberry Law Firm Inc.  
18 888 16th Street, N.W., 7th Floor  
Washington, DC 20006
- 19 Timothy A. Bumann Defendants - Taurus International  
20 Budd, Larner, Gross, Rosenbaum, Manufacturing, Inc.; Forjas Taurus, S.A.  
Greenberg & Sade  
21 150 John F. Kennedy Parkway CN 1000  
Short Hills, NJ 07078-0999
- 22 R.D. Kirwin Defendant - H&R 1871, Inc.  
23 Robert n. Tafoya  
Akin, Bump, Strauss, Hauer & Feld  
24 2029 Century Park East, Suite 2500  
Los Angeles, CA 90067
- 25 Ginger F. Heyman Defendant - Ellert Brothers, Inc.  
26 Crosby, Heafy, Roach & May  
700 S. Flower Street, Suite 2200  
27 Los Angeles, CA 90017

SEDGWICK,  
DETERT, MORAN  
& ARNOLD

28 //

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

2 Executed on September 29, 1999, at San Francisco, California.

3  
4   
Kathleen Dorio