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5 Attorneys for Defendant  
SMITH AND WESSON CORP., and  
6 STURM, RUGER & COMPANY, INC.

7 SEE SIGNATURE PAGE FOR ADDITIONAL COUNSEL  
AND PARTIES JOINING MOTION  
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 CITY AND COUNTY OF SAN FRANCISCO  
11

12 PEOPLE OF THE STATE OF CALIFORNIA, ) No. BC214794  
*ex rel.* the County of Los Angeles, COUNTY )  
13 OF LOS ANGELES, on behalf of itself and the ) **DECLARATION OF CHARLES L.**  
general public, and GLORIA MOLINA, ZEV ) **COLEMAN, III AND REQUEST FOR**  
14 YAROSLAVSKY and YVONNE ) **JUDICIAL NOTICE**  
BRATHWAITE BURKE, SUPERVISORS OF )  
15 LOS ANGELES COUNTY, on behalf of the )  
general public, )

16  
17 Plaintiffs,

18 vs

19 ARCADIA MACHINE & TOOL, INC.,  
BRYCO ARMS, INC., DAVIS INDUSTRIES,  
20 INC., LORCIN ENGINEERING CO., INC., ,  
PHOENIX ARMS, SUNDANCE  
INDUSTRIES, INC., EXCEL INDUSTRIES,  
21 INC., ACCU-TEK FIREARMS, BERETTA  
U.S.A. CORP., PIETRO BERETTA Sp.A.,  
22 BROWNING ARMS, CO., CARL  
WALTHER, GmbH, CHARTER ARMS,  
23 INC., COLT'S MANUFACTURING CO.,  
INC., FORJAS TAURUS, S.A., GLOCK,  
24 INC., GLOCK GmbH, H&R 1871, INC.,  
HECKLER & KOCH, INC., MKS SUPPLY,  
25 INC., HI-POINT FIREARMS, KEL-TEC CNC  
INDUSTRIES, INC., CHINA NORTH  
26 INDUSTRIES A/K/A NORINCO, NAVEGAR  
INC. D/B/A/ INTRATEC U.S.A., INC.,  
27 NORTH AMERICAN ARMS, INC.,  
SIGARMS, INC., SMITH & WESSON  
28

**Date:**

**Time:**

**Dept.:**

**Judge:**

**Complaint Filed:**

**Amended Complaint Filed:**

**Trial Date: None Set**

9-30-99

1 CORP., STURM RUGER & COMPANY, )  
INC., S.W. DANIELS, INC., A/K/A )  
2 COBRAY FIREARMS, INC., TAURUS )  
INTERNATIONAL MANUFACTURING, )  
3 INC., AMERICAN SHOOTING SPORTS )  
COUNCIL, INC., NATIONAL SHOOTING )  
4 SPORTS FOUNDATION, INC., SPORTING )  
ARMS AND AMMUNITION )  
5 MANUFACTURERS' INSTITUTE, INC., )  
B.L. JENNINGS, INC., ELLETT )  
6 BROTHERS, INTERNATIONAL )  
ARMANENT CORP., D/B/A INTERARMS )  
7 INDUSTRIES, INC., RSR WHOLESALE )  
GUNS, INC., SOUTHERN OHIO GUN )  
8 DISTRIBUTORS, B&B GUNS, ANDREWS )  
SPORTING GOODS, INC., NATIONAL )  
9 GUNS SALES, INC., S.G. DISTRIBUTING, )  
INC., HAWTHORNING DISTRIBUTORS, )  
10 INC. and DOES 1-300, )

11 Defendants. )  
12

13 I, Charles L. Coleman, III, declare and state as follows:


14 1. I am a partner with the law firm of Holland & Knight LLP and am an  
15 attorney for Heckler & Koch, Inc. in this action. I make this declaration in support  
16 of Defendants' demurrers. Unless otherwise indicated, I have personal knowledge  
17 of the facts stated herein, and if called as a witness, could and would testify to the  
18 following matters.

19 2. Attached hereto as Exhibit A is a Legislative Compendium prepared  
20 under my direction setting forth a summary of certain bills, as found in the Official  
21 Legislative Bill Tracking Service, that the California Legislature has considered  
22 from 1995 until the present relating to firearms issues that are raised in the First  
23 Amended Complaint herein.

24 3. Accompanying this declaration as Exhibit B hereto are true and correct  
25 copies of the bills listed in Exhibit A that were printed and assembled at my  
26 request.

4. Pursuant to California Evidence Code § 452(b)-(c) and California Rule of Court 323(b) this Court is respectfully requested to take judicial notice of all bills considered by the California Legislature relating to firearms listed in Exhibit A and attached as Exhibit B.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 30<sup>th</sup> day of September, 1999 at San Francisco, California.

  
Charles L. Coleman, III