

EXHIBIT A

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7 Attorneys for Defendants
 CITY AND COUNTY OF SAN FRANCISCO,
 8 THE MAYOR OF SAN FRANCISCO and
 9 THE CHIEF OF THE SAN FRANCISCO POLICE DEPARTMENT

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 ESPANOLA JACKSON, PAUL COLVIN,
 13 THOMAS BOYER, LARRY BARSETTI,
 DAVID GOLDEN, NOEMI MARGARET
 14 ROBINSON, NATIONAL RIFLE
 ASSOCIATION OF AMERICA, INC., and
 15 SAN FRANCISCO VETERAN POLICE
 OFFICERS ASSOCIATION,

16 Plaintiffs,

17 vs.

18 CITY AND COUNTY OF SAN
 19 FRANCISCO, THE MAYOR OF SAN
 FRANCISCO, and THE CHIEF OF THE SAN
 20 FRANCISCO POLICE DEPARTMENT, in
 their official capacities,

21 Defendants.
 22

Case No. CV-09-2143-RS

**PLAINTIFF CITY AND COUNTY OF SAN
 FRANCISCO'S INTERROGATORIES TO
 ESPANOLA JACKSON (SET ONE)**

23
 24 REQUESTING PARTY: CITY AND COUNTY OF SAN FRANCISCO
 25 RESPONDING PARTY: ESPANOLA JACKSON
 26 SET NUMBER: ONE
 27

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant City and County of San
2 Francisco hereby requests that Plaintiff Espanola Jackson answer in writing and under oath the
3 following Interrogatories within thirty (30) days of the date of service.
4

5 INSTRUCTIONS

- 6 1. Answers and objections must conform to the requirements of Rule 33(b) of the Federal Rules
7 of Civil Procedure and N. D. Cal. Civil Local Rule 33-1.
- 8 2. Objections on the basis of privilege or work-product protection must be made expressly, and
9 the responsive information or materials withheld on the basis of such an objection must in a log in
10 accordance with Rule 26(b)(5) of the Federal Rules of Civil Procedure and governing case law. The
11 privilege log should be served simultaneously with the answers and objections.
- 12 3. Words used in the Interrogatories should be given their common meaning unless the word or
13 words appear in the following list of definitions, in which case the provided definition should be used.
- 14 4. To the extent required by Rule 26(e) of the Federal Rules of Civil Procedure, you must
15 promptly furnish, in the form of supplemental answers, any information requested in these
16 interrogatories that first becomes known to you after the date of your response.
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18 DEFINITIONS

- 19 A. Unless otherwise stated, the terms “**and**” and “**or**” are to be read in both the
20 conjunctive and disjunctive and shall encompass all information that would be
21 responsive under a conjunctive reading and all information that would be responsive
22 under a disjunctive reading.
- 23 B. “**Any**” is understood to include and encompass “**all**.” “**All**” also includes “**each**,” and
24 vice versa.
- 25 C. “**Concerning**” means and includes constituting, referencing, explaining, stating,
26 describing, containing, relating to, referring to, reflecting, evidencing, memorializing,
27 repeating, incorporating, reporting, confirming, discussing, listing, summarizing,
28 showing, supporting, refuting, depicting, connected with, embodying, or mentioning.

1 D. "You" and "your" mean Espanola Jackson, plaintiff in the above-captioned lawsuit, her
2 employees, agents, representatives or anyone else acting on her behalf.

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4 **INTERROGATORIES**

5 INTERROGATORY NO. 1:

6 Describe the circumstances in which you first became aware of San Francisco Police Code sections
7 4512 and 613.10(g), including, but not limited to, the date on which you first became aware of each
8 ordinance, the speaker or document from which you learned of each ordinance, and the content of that
9 communication.

10 INTERROGATORY NO. 2:

11 Identify each firearm that has been in your private residence while in your possession, custody or
12 control at any time since August 2007, including but not limited to its make, model and serial number
13 and the period of time during which you kept that firearm in your home.

14 INTERROGATORY NO. 3:

15 Identify every type of ammunition you have purchased for or used in each of the firearms you
16 identified in response to Interrogatory No. 2, including but not limited to its manufacturer or brand
17 name, caliber, jacket construction, place of purchase and date of purchase.

18 INTERROGATORY NO. 4:

19 Identify by manufacturer or brand name and model every trigger lock, lockbox, or other locking
20 device you have used at any time to secure a firearm while it was in your possession, custody or
21 control, whether in your home or elsewhere.

22 INTERROGATORY NO. 5:

23 Describe every communication, whether written or verbal, between you and any employee or official
24 of the City and County of San Francisco concerning the subject matter of your complaint in this
25 action, including but not limited to the date, medium, participants in and content of the
26 communication.

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1 INTERROGATORY NO. 6:

2 If you have ever been arrested in any jurisdiction for any reason, identify the date, the arresting
3 agency, the alleged offense(s), the charge(s) brought, and the disposition of any charge(s).

4 INTERROGATORY NO. 7:

5 List every permit, license or registration issued to you concerning the possession or use of firearms or
6 ammunition, including its type, date of issue, the issuing agency, the expiration date (if any), any
7 conditions or restrictions it imposes, any period during which it was suspended or revoked, and the
8 reason given for the suspension or revocation.

9 INTERROGATORY NO. 8:

10 List every permit, license or registration concerning the use or possession of firearms for which you
11 have applied but which application was denied, including its type, the issuing agency, the date you
12 applied, and the reason given for the denial.

13 INTERROGATORY NO. 9:

14 Identify every person and organization other than your counsel with whom you have discussed or
15 otherwise communicated about the subject matter of this lawsuit or your participation in it at any time,
16 whether such discussion or communications were verbal or written, the subject matter of those
17 discussions or communications, and the date or dates on which such discussions or communications
18 took place.

19 INTERROGATORY NO. 10:

20 Describe any training you have had in gun safety, including its date, the person or agency that
21 provided the training, the length of the training, and its general content.

22 INTERROGATORY NO. 11:

23 Describe any training you have had in using a firearm in self defense, including its date, the person or
24 agency that provided the training, the length of the training, and its general content.

25 INTERROGATORY NO. 12:

26 Identify every residence in which you have lived during the last ten years, including its address, its
27 owner, and the period of time in which you lived at that location.

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1 INTERROGATORY NO. 13:

2 For each residence you identified in response to Interrogatory No. 12, provide the full name of any
3 person who lived with you in that residence at any time, that person's approximate age at the time, and
4 the most recent address, telephone number, email address or other contact information you have for
5 that person.

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7 Dated: November 17, 2011

8 DENNIS J. HERRERA
9 City Attorney
10 WAYNE SNODGRASS
11 SHERRI SOKELAND KAISER
12 Deputy City Attorneys

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14 By: 
15 SHERRI SOKELAND KAISER

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