

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>EZELL, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>No. 10-CV-5135</b>
	)	<b>Judge Virginia M. Kendall</b>
<b>CITY OF CHICAGO,</b>	)	
	)	
<b>Defendant.</b>	)	

**INDEX OF EXHIBITS TO  
DEFENDANT’S LOCAL RULE 56.1(a)(3) STATEMENT OF MATERIAL FACTS**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
1.	Second Amended Complaint (“SAC”)
2.	Rhonda Ezell Deposition Excerpts (“Ezell Dep.”)
3.	Joseph I. Brown Deposition Excerpts (“Brown Dep.”)
4.	William Hespen Deposition Excerpts (“Hespen Dep.”)
5.	Christopher Hart Deposition 1 Excerpts (September 10, 2010) (“Hart Dep. 1”)
6.	Christopher Hart Deposition 3 Excerpts (August 20, 2013) (“Hart Dep. 3”)
7.	Julianne Versnel Deposition Excerpts (“Versnel Dep.”)
8.	Richard Pearson Deposition Excerpts (“Pearson Dep.”)
9.	July 2011 Ordinance
10.	Committee on Public Safety Meeting, July 5, 2011, Transcript Excerpts (“Committee on Public Safety Meeting”)
11.	September 2011 Amendments (“Sept. 2011 Amendments”)
12.	January 2013 Amendments (“Jan. 2013 Amendments”)

13. September 2013 Amendments (“Sept. 2013 Amendments”)
14. Chart comparing original and current versions of the challenged provisions (“Chart”)
15. KramerOne Report (“KramerOne Rpt.”)
16. Jack Giordano Deposition Excerpts (“Giordano Dep.”)
17. Lorin Kramer Deposition Excerpts (“Kramer Dep.”)
18. Steven Valenziano Deposition Excerpts (“Valenziano Dep.”)
19. Department of Housing and Economic Development Map (“DHED Map”)
20. Patti Scudiero Deposition Excerpts (“Scudiero Dep.”)
21. Kevin Johnson Deposition Excerpts (“Johnson Dep.”)
22. Defs.’ Resp. to Pls.’ First Set of Supp. F.R.C.P. 33 Interrog. (July 16, 2012) (“Defs.’ Resp. to Pls.’ Interrog.”)
23. Excerpts from *The Range Source Book: A Guide To Planning and Construction*, NRA (2004 ed.) (“NRA Range Source Book”)
24. *NIOSH Alert: Preventing Occupational Exposures to Lead and Noise at Indoor Firing Ranges*, National Institute for Occupational Health and Safety (Apr. 2009) (“NIOSH Alert, Apr. 2009”)
25. Articles about gun range fires
  - a. *Portsmouth police shooting-range fire accidental, says chief*, seacoastonline.com (Oct. 29, 2013), available at <http://www.seacoastonline.com/apps/pbcs.dll/article?AID=/20131029/NEWS/131029714/-1/NEWSMAP> (last visited Dec. 3, 2013)
  - b. *Four-alarm fire engulfs Dallas shooting range*, WFAA.com (Feb. 24, 2013), available at <http://www.wfaa.com/news/local/dallas/Three-alarm-fire-engulfs-Dallas-gun-range-192889931.html> (last visited Dec. 3, 2013)
  - c. *Fire at shooting range is latest in long history of problems*, pilotonline.com (May 13, 2008), available at <http://hamptonroads.com/2008/05/fire-shooting-range-latest-long-history-problems> (last visited Dec. 3, 2013)

26. Christopher Hart Deposition 2 (June 14, 2012) Excerpts (“Hart Dep. 2”)
27. Deon Robuck Deposition Excerpts (“Robuck Dep.”)
28. *Reducing Exposure to Lead and Noise at Indoor Firing Ranges*, National Institute for Occupational Health and Safety (Jan. 2010) (“NIOSH Report, Jan. 2010”)
29. *Firing Range*, Whole Building Design Guide (updated June 30, 2009) (“Whole Building Design Guide”)
30. *Lead hazards at indoor firing ranges*, Washington Dept. of Labor and Industries (Apr. 2000) (“Washington Dept. of Labor and Industries”)
31. Declaration of Robert Fahlstrom (“Fahlstrom Decl.”)
32. Deposition of Robert Fahlstrom (“Fahlstrom Dep.”)
33. Stipulation
34. Provisions of the New Jersey Public Employees Occupational Safety and Health Act (“N.J.A.C.”)
35. Emails, Exhibit 3 of Christopher Hart Deposition 2 (June 14, 2012) (Email, Hart Dep. 2, Ex. 3)
36. *Range Design Criteria*, U.S. Dept. of Energy (Aug. 2008) (“U.S. Dept. of Energy”)
37. Lafayette, Indiana, Municipal Code
38. Kevin Schnoes Deposition Excerpts (“Schnoes Dep.”)
39. Rosemary Krimbel Deposition Excerpts (“Krimbel Dep.”)
40. Expert report of Dr. Philip J. Cook (“Cook Expert Rpt.”)
41. Articles and news releases regarding thefts and burglaries at gun stores and gun ranges (“News Releases”)
  - a. ATF News Release, CITY 0633
  - b. Tinley Park police reports, CITY 00634-000685
  - c. May 12, 2010 Chicago Tribune Article, CITY 000702

- d. ATF and DOJ news release, CITY 000697
  - e. DOJ news release, CITY 000701
  - f. ATF and DOJ news release, CITY 000686
  - g. ATF and DOJ news release, CITY 000687
  - h. ATF and DOJ news release, CITY 000688
  - i. ATF and DOJ news release, CITY 000689
  - j. ATF and DOJ news release, CITY 000692
  - k. ATF and DOJ news release, CITY 000693
  - l. ATF and DOJ news release, CITY 000694
  - m. ATF and DOJ news release, CITY 000695
  - n. ATF and DOJ news release, CITY 000698
  - o. DOJ news release, CITY 000699
  - p. Sacramento Bee August 2011 Report of ATF News Release re Gun Thefts from Two Stores in Lincoln, Nebraska
42. Pl. Action Target, Inc.'s Ans. to Def.'s Second Set of Interrogatories (February 14, 2012) ("Action Target Ans. to Def.'s Interrog.")
43. Jonathan Gordon Deposition Excerpts ("Gordon Dep.")
44. Paul Kuczmierczyk Deposition Excerpts ("Kuczmierczyk Dep.")
45. Peter J. Negro Deposition Excerpts ("Negro Dep.")
46. Andre Queen Deposition Excerpts ("Queen Dep.")