

Exhibit 31

to

Plaintiffs' Cross-Motion for Summary Judgment

and

Opposition to Defendants' Motion for Summary
Judgment

In The Matter Of:

*Shawn J. Tardy, et al. vs.
Martin J. O'Malley, et al.*

Anthony W. Batts

Vol. 1

December 19, 2013

Gore Brothers Reporting & Videoconferencing

20 South Charles Street, Suite 901

Baltimore, MD 21201

410-837-3027

www.gorebrothers.com



Since 1961 - Serving MD, DC & VA - Worldwide

Min-U-Script® with Word Index

1 of your deposition today.

2 A Okay. I'm looking at page five of the
3 document that is -- looks like Sub Category E.
4 Commissioner Anthony W. Batts, Baltimore City Police
5 Department. Relates to training, firearms secured
6 by officers at the police department. The lack of
7 the use of assault weapons. The dangerousness of
8 assault weapons and high capacity magazines.
9 Opinion on assault weapons high capacity. Lessons
10 learned from mass shooting incidents. Gives the
11 address of the police organization.

12 Is that it on page six?

13 Q Yes.

14 A Okay.

15 Q And are you generally familiar with the
16 subject matters that are listed there?

17 A Generally. I am not an expert, but
18 generally, yes.

19 MR. SWEENEY: All right. Please mark
20 that as Exhibit 1, Batts 1.

21 (Batts Exhibit 1 was marked for purposes

1 with?

2 A Sure.

3 Q Would you consider assault rifles to be
4 commonly found throughout the State of California?

5 A How are you defining commonly?

6 Q Just how would you define it?

7 A I don't know. I didn't ask the question,
8 but I will try to gauge it. California has very
9 strict laws dealing with assault rifles, and they
10 have so for many years. And there's been a pretty
11 dramatic push to get a handle on assault rifles.
12 But yet and still, as you crank down on those laws,
13 I think the availability is less and less. But
14 there, again, we had talked about in crimes those
15 are rarities in the first place.

16 Q But not criminal use, but simply
17 possession and use by law abiding citizens is
18 something you can find throughout the State of
19 California, correct?

20 A I couldn't answer that.

21 Q Okay. You mentioned a role with the