EXHIBIT G

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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

IVAN PENA, ROY VARGAS, DONA CROSTON, BRETT THOMAS, SECOND AMENDMENT FOUNDATION, INC. AND THE CALGUNS FOUNDATION, INC.

Plaintiffs,

vs.

STEPHEN LINDLEY,

Defendant.

Case No: 2:09-CV-01185-KJM-CMK

PLAINTIFF DONA CROSTON'S RESPONSE TO DEFENDANT STEPHEN LINDLEY'S FIRST SET OF REQUESTS FOR ADMISSIONS

TO THE DEFENDANT HEREIN AND TO ITS ATTORNEYS OF RECORD:

PLAINTIFFS, by their attorney of record, hereby respond to the Request for Admissions served on them, by Defendant, as follows:

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1

Admit that you own at least one operable handgun that is suitable for self-defense.

RESPONSE TO REQUEST FOR ADMISSION NO. 1

OBJECTION: Plaintiff objects on grounds that the request does not seek information that is either relevant or calculated to lead to the discovery of relevant evidence.

RESPONSE: Without waiving the aforementioned objections, Plaintiff responds: I admit that I have at least one fully functional handgun, as defined in Penal Code section 16640, which may be suitable for self-defense purposes in certain circumstances, but may not be suitable for self-defense purposes in other circumstances.

REQUEST FOR ADMISSION NO. 2

Admit that you are able to purchase an operable handgun that is suitable for self-defense.

RESPONSE TO REQUEST FOR ADMISSION NO. 2

OBJECTION: This request is so vague or ambiguous as to be burdensome or oppressive as to the meaning of "suitable for self-defense." Moreover, Plaintiff would have to speculate as to the meaning of the phrase "suitable for self-defense." Firearms are tools. While one firearm may be suitable for self-defense in one scenario, it may not be suitable for self-defense in another scenario. As such, the term "suitable for self-defense" is too vague and ambiguous to properly respond to.

RESPONSE: Without waiving the aforementioned objections, Plaintiff responds: Admit.

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REQUEST FOR ADMISSION NO. 3

Admit that you are able to obtain a Springfield Armory XD-45 Tactical 5" Bi-Tone stainless steel/black handgun in .45 ACP, model number XD9623, through a private-party transfer under California Penal Code section 32210(a).

RESPONSE TO REQUEST FOR ADMISSION NO. 3

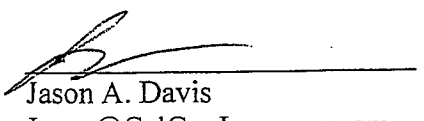
OBJECTION: This request is so vague or ambiguous as to be burdensome or oppressive as to the meaning of "able to obtain." Does this term, in the context of the request, mean physically able, financially able, legally able, or logistically able? Moreover, Plaintiff would have to speculate as to the meaning of the phrase "able to obtain."

OBJECTION: This request seeks an admission pertaining to statements of law. Such matters are outside the scope of information permitted by the applicable court rules governing Requests for Admissions.

RESPONSE: Subject to the foregoing objections without waiving same, Denied. Plaintiff is unaware of any private parties with a California Driver License, California Identification Card or Military identification card who possess such a firearm in an unaltered factory manufactured condition. Nor is Plaintiff aware of any private parties with a California Driver License, California Identification Card or Military identification card who are willing to sell said firearm in an unaltered factory manufactured condition. And, such a firearm is not on the list of handguns approved for a California licensed dealer direct sale in California.

Date: December 11, 2012

WITH RESPECT TO OBJECTIONS ONLY
Respectfully submitted,
Davis & Associates



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