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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

TERI SEE and DARREL SEE,)
 wife and husband,)
)
 Plaintiffs,) Civil No. 81-886
)
 v.)
)
 REMINGTON ARMS COMPANY, INC.,) PLAINTIFFS' SECOND
 a Delaware corporation,) REQUEST FOR PRODUCTION
)
 Defendants.)

Pursuant to FRCP 34, plaintiffs request that defendant produce for inspection and copying, within 30 days of the date of service of this request, the documents set forth below. As used in this request, the word "document" shall be given its broadest possible meaning and shall include, but not be limited to, all forms of documents set forth in FRCP 34(a). Production shall be at the offices of Bodyfelt, Mount, Stroup & Chamberlain, Room 214, 708 S.W. Third Avenue, Portland, Oregon.

DOCUMENTS

1^b. All manufacturing, trade and governmental standards, codes or regulations with which defendant complied or attempted

1 to comply, whether suggested, voluntary or mandatory, in and
2 related to the design, manufacture and sale of the Remington
3 Model 700 rifle during the period 1975 through 1981.

4 15. All test procedures and test results for all tests
5 performed on the Remington Model 700 rifles which were the sub-
6 ject of the 49 gun examination reports produced by defendant.

7 16. The gun examination report for defendant's examination
8 of this rifle.

9 17. All test procedures and test results for all tests
10 performed on the trigger mechanism of the Remington Model 700
11 rifle in the design and manufacture of that weapon.

12 18. All test procedures and test results for all tests
13 performed on the safety mechanism of the Remington Model 700
14 rifle in the design and manufacture of that weapon.

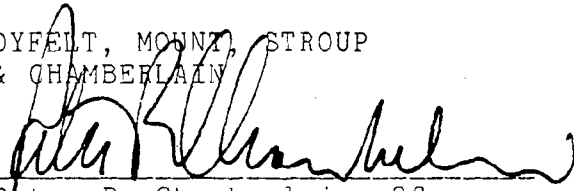
15 19. All letters, memoranda, notes or other correspondence
16 which gave rise to the preparation of the 49 gun examination
17 reports previously produced by defendant.

18 20. All documents in your possession relating to the law-
19 suits previously produced by defendant.

20 DATED this 10th day of May, 1982.

21 BODYFELT, MOUNT, STROUP
22 & CHAMBERLAIN

23 By


24 Peter R. Chamberlain, Of
25 Attorneys for Plaintiffs
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