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May 10, 1982

HAND DELIVERED

James D. Huegli
Attorney at Law
1200 Standard Plaza
Portland, OR 97204

Dear Jim:

Re: See v. Remington Arms

Your copies of documents produced May 3, 1982, are being returned with this letter. Based upon my review of these documents, it appears you have substantially complied with parts 1 through 4 and 6 of my request for production, but that you have not complied with part 5, nor parts 7 through 13.

Since you have provided me with drawings for the Model 600 rifle, I am satisfied to wait for further production of documents relating to the Model 600 until such time as my expert has had a chance to review those drawings and tell me if the 600 and 700 rifles are significantly similar.

With that aside, there are still several areas of production where Remington has not complied with my request for production and the court's order compelling production. These areas are as follows:

(1) Request No. 5 - While you have produced 49 gun examination reports and certain litigation documents, there certainly must be other documents underlying these reports and lawsuits. For instance, each gun examination report certainly must be documented by a letter of complaint, transmittals, test records, etc. All such documents are within the scope of my request and the court's order. Similarly, with the lawsuits.

(2) Request No. 4 - The gun examination report for our rifle has not been included. Certainly, we are entitled to that.

(3) Request No. 8 - The court did not sustain your objection to this request. If you truly believe that the request is so broad as to be burdensome, I would be satisfied, for the time being, by a production of the following:

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(a) A complete index of all tests performed by Remington on its Model 700 rifle; and

(b) Copies of all test procedures and test results for all tests performed on the guns mentioned in the 49 gun examination reports, plus the reports on our gun; and

(c) All tests performed on the trigger mechanism and safety mechanism of the Model 700 in the design and manufacture of that weapon.

By so agreeing, I do not intend to waive or limit my right to request further test results from the index of tests.

(4) Request No. 10 - I would like to know (and am entitled to know) your policy limits, whether there is excess insurance and, if so, the amounts and whether or not the defendant's policies are consent policies.

In addition to the above, I have requested certain additional documents which are set forth in plaintiffs' second request for production, which is enclosed. Also enclosed are some interrogatories and some requests for admission. Because of the discovery cut-off deadline, I cannot and will not grant extensions of time within which to respond to any of these items.

Lastly, we will want to take a number of depositions. I think we should discuss this before I prepare notices, et cetera. The people I will want to depose include the following:

(1) The person or persons primarily responsible for interpreting my requests for production and in locating documents and producing same.

(2) M. Hardy (checked guns per gun examination reports).

(3) R. L. Jay (checked guns per gun examination reports).

(4) The persons whose initials appear on the 49 gun examination reports (there appear to be five or six such persons).

(5) The person or persons primarily responsible for the design of the Model 700 rifle.

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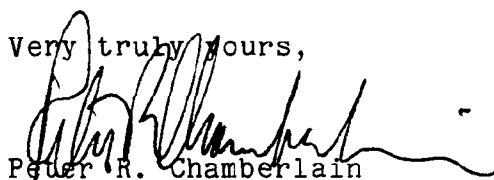
(6) The person or persons primarily responsible for overseeing manufacture of the Model 700 rifle during the period 1976-1981.

(7) The person or persons primarily responsible for quality assurance in the manufacture of the Model 700 during the period 1976-1981.

I have a couple of ideas regarding the taking of these depositions. If you are willing to bring these people to Oregon, at Remington's expense, that would be fine, provided that all document production has been completed prior to their arrival. If that is not agreeable to Remington, I am willing to travel to Connecticut, or wherever else they may be, for purposes of taking the depositions. If we do it that way, I would suggest we set aside a week late this month or during the first part of June. I can be available the weeks of May 17, May 24, June 1 (four-day week) and June 7. If need be, some of the depositions could be taken by phone (such as those under category (1)), but I do not want to take all of them by phone.

Please give me a call when you have had a chance to digest this letter. Even with the court's extension of the discovery deadline, we do not have a great deal of time left and I am anxious to keep this case moving. I will not start arbitrarily noticing depositions unless I don't hear from you by May 14.

Very truly yours,



Peter R. Chamberlain

PRC:lmj

Enclosures