

NO. 2,298

GREGG R. PARKER, ET AL	§	IN THE DISTRICT COURT
VS.	§	112TH JUDICIAL DISTRICT
REMINGTON ARMS CO., INC.	§	
ET AL	§	SUTTON COUNTY, TEXAS

MOTION OF DEFENDANT REMINGTON ARMS CO., INC.  
FOR PRODUCTION AND INSPECTION

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, REMINGTON ARMS CO., INC. one of the Defendants in the above styled and numbered cause and pursuant to Rule 167, Texas Rules of Civil Procedure requests that Plaintiffs be required to produce the rifle made the basis of this lawsuit for inspection and testing by Defendant for the following reasons:

I.

Plaintiffs have alleged that their injuries occurred as a result of an unreasonably dangerous and defective rifle, allegedly manufactured and sold by this Defendant.

II.

It is believed that either Plaintiffs or their attorney is in possession of or has control over the rifle made the basis of this lawsuit.

III.

That in order for Defendant to adequately defend itself against Plaintiff's allegations it is necessary that experts in the field of firearms have the opportunity to inspect and conduct tests upon the rifle.

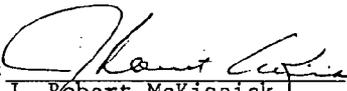
IV.

That such inspection and testing of the rifle is necessary because it constitutes evidence material to the issues of liability involved in this action or are reasonably calculated to lead to the discovery of evidence material to the issue of liability in this cause of action.

WHEREFORE, PREMISES CONSIDERED, Defendant, Remington Arms Co., Inc. prays that this Court enter it's order requiring Plaintiffs to produce the rifle made the basis of this lawsuit for inspection and testing by experts of Defendants choice.

Respectfully submitted,

KLEBERG & WEIL  
Post Office Box 2446  
Corpus Christi, TX 78403  
(512) 884-3551

BY:   
J. Robert McKissick

ATTORNEYS FOR DEFENDANT  
REMINGTON ARMS CO., INC.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the Motion of Defendant Remington Arms Co., Inc. for Production and Inspection have been duly forwarded to Plaintiff's attorney, Mr. Jeffrey C. Anderson, Southers, Goldberg, & Lyons, Inc., 126 Villita Street, San Antonio, TX 78205, Mr. Grey Pierson, 725 Lamar Blvd. East, Suite C, Arlington, TX 76011, and Mr. Randall Lundy, Lynch, Chappell, Allday & Aldridge, 201 Wall Towers East, Midland, TX 79701 by United States Mail, Certified, Returned Receipt Requested on this the 23 day of May, 1979.

  
J. Robert McKissick

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REMINGTON ARMS CO., INC.	§	
ET AL	§	SUTTON COUNTY, TEXAS

MOTION OF REMINGTON ARMS CO., INC.  
TO COMPEL ANSWERS TO INTERROGATORIES

TO THE HONORABLE JUDGE OF SAID COURT:

Heretofore certain Interrogatories have been served on Plaintiff GREGG R. PARKER requesting certain information which is properly discoverable under Rule 168 of the Texas Rules of Civil Procedure. The Plaintiff has failed to serve on this party properly signed and sworn Answers, as required by said Rule.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that a hearing be set on this Motion, and that Gregg R. Parker be ordered to answer Defendant's Interrogatories in writing, sign and verify such Answers under oath and to serve same on the undersigned attorney of record for Defendant, Remington Arms Co., Inc., and that the Court award to Defendant attorney's fees and expenses necessary to obtain such orders from the Court as needed to compel Plaintiff's Answers.

Respectfully submitted,

KLEBERG & WEIL  
Post Office Box 2446  
Corpus Christi, TX 78403  
(512) 884-3551

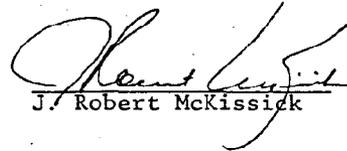
BY:

  
J. Robert McKissick

ATTORNEYS FOR DEFENDANT  
REMINGTON ARMS CO., INC.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Motion of Remington Arms Co., Inc. to Compel Answers to Interrogatories have been duly forwarded to Plaintiff's attorney, Mr. Jeffrey C. Anderson, Southers, Goldberg & Lyons, Inc. 126 Villita Street, San Antonio, TX 78205, Mr. Grey Peirson, 725 Lamar Blvd. East, Arlington, TX 76011, and Mr. Randall Lundy, 201 Wall Towers East, Midland, TX 79701 by United States Mail, Certified, Return Receipt Requested on this the 23 day of May, 1979.

  
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MOTION OF REMINGTON ARMS CO., INC.  
TO COMPEL ANSWERS TO INTERROGATORIES

TO THE HONORABLE JUDGE OF SAID COURT:

Heretofore certain Interrogatories have been served on Plaintiff CAROL ANN PARKER requesting certain information which is properly discoverable under Rule 168 of the Texas Rules of Civil Procedure. The Plaintiff has failed to serve on this party properly signed and sworn Answers, as required by the Rule.

WHEREFORE, PREMISES CONSIDERED Plaintiff asks that a hearing be set on this Motion, and that Carol Ann Parker be ordered to answer Defendant's Interrogatories in writing, sign and verify such Answers under oath and to serve same on the undersigned attorney of record for Defendant, Remington Arms Co., Inc. and that the Court award to Defendant attorney's fees and expenses necessary to obtain such orders from the Court as needed to compel Plaintiff's Answers.

Respectfully submitted,

KLEBERG & WEILL  
Post Office Box 2446  
Corpus Christi, TX 78403  
(512) 884-3551

BY:   
J. Robert McKissick

ATTORNEYS FOR DEFENDANT  
REMINGTON ARMS CO., INC.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Motion of Remington Arms Co., Inc. to Compel Answers to Interrogatories have been duly forwarded to Plaintiff's attorney, Mr. Jeffrey C. Anderson, Southers, Goldberg & Lyons, Inc. 126 Villita Street, San Antonio, TX 78205, Mr. Grey Peirson, 725 Lamar Blvd. East, Arlington, TX 76011, and Mr. Randall Lundy, 201 Wall Towers East, Midland, TX 79701 by United States Mail, Certified, Return Receipt Requested on this the 23 day of May, 1979.

  
J. Robert McKissick