

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JUAN LOPEZ,
Plaintiff

VS.

C.A. NO. C-80-120

REMINGTON ARMS COMPANY,
INC.,
Defendant

RESPONSE TO REQUEST FOR PRODUCTION AND
SUPPLEMENTAL REQUEST FOR PRODUCTION

TO: Defendant, Remington Arms Company, Inc., and its attorney
in charge, J. Robert McKissick, KLEBERG, DYER, REDFORD &
WEIL, Post Office Box 2446, Corpus Christi, Texas 78403.

In accordance with the appropriate rule of civil procedure,
your Plaintiff in this case requests this Court to protect the
Plaintiff and his cause of action by restricting the production
requested by the Defendant, and would show the Court as follows:

I.

In its request and supplemental request for production, the
Defendant is asking the Court to order the Plaintiff to deliver
the rifle involved, as well as live ammunition, spent cartridges,
etc. for inspection and testing at the office of the undersigned
attorney, on October 24, 1980 at 10:00 o'clock in the morning,
at which time said items are to be released to Defendant and its
attorney for inspection, non-destructive testing, and/or copying
at Defendant's expense, to be returned to the Plaintiff's
attorney within thirty days.

II.

Your Plaintiff will show he has no objection to the produc-
tion as requested, but is concerned about the damages to the
cause of action in the event such items are lost, destroyed or
damaged. Accordingly, your Plaintiff asks this Court to require
the Defendants to post a bond payable to the Plaintiffs in an
amount sufficient to compensate the Plaintiff for all his
damages in the event such items are lost, damaged or destroyed;
that in the event the items are lost, damaged or destroyed,

the Defendant in no way be allowed to utilize any of its findings in the trial of this cause or contest the findings of the Plaintiff, or that the Court enter some other order that will fully protect the Plaintiff in the premises.

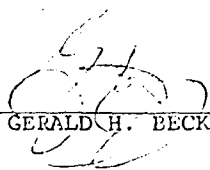
Respectfully submitted,

HUERTA, BECKMAN & RODRIGUEZ
ATTORNEYS AT LAW
P. O. BOX 7219 -- 3301 AYERS ST.
CORPUS CHRISTI, TEXAS 78415

BY: _____
GERALD H. BECKMAN

CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached Response to Request for Production and Supplemental Request for Production has been served upon counsel for Defendant, Mr. J. Robert McKissick, by mailing same to him by first class, United States mail, properly addressed and postage pre-paid at the same time the original was mailed for filing with the Clerk of this Court on this the 3 day of October, 1980.



GERALD H. BECKMAN

NO. 10,902

JUAN LOPEZ

VS.

REMINGTON ARMS CO., INC.

IN THE DISTRICT COURT

229TH JUDICIAL DISTRICT

DUVAL COUNTY, TEXAS

ANSWER TO PETITION FOR REMOVAL

COMES NOW Juan Lopez, Petitioner herein, and would respectfully show the Court the following:

I.

Your Plaintiff does not oppose Defendant's Petition for Removal.

II.

Your Plaintiff demands a jury trial.

Respectfully submitted,

HUERTA, BECKMAN & RODRIGUEZ
ATTORNEYS AT LAW
P. O. BOX 7219 -- 3301 AYERS ST.
CORPUS CHRISTI, TEXAS 78415

BY: 

GERALD H. BECKMAN