

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

EDWIN C. DELOACH AND LINDA	\$	
DELOACH, INDIVIDUALLY AND AS	\$	
NATURAL GUARDIANS AND NEXT	\$	
FRIENDS OF ROBERT E. DELOACH,	\$	
A MINOR	\$	
VS.	\$	CV292-78
REMINGTON ARMS COMPANY,	\$	
INC., AND E.I. DUPONT DE	\$	
NEMOURS AND COMPANY	\$	

AFFIDAVIT OF WILLIAM H. COLEMAN, II

I William H. Coleman, II after being first duly sworn state that I am above the age of 21, have never been convicted of a felony, have personal knowledge of the following information and am otherwise competent to testify. In February of this year, I retired from Remington Arms Company, Inc. Prior to this retirement, however, I was Manager of Technical Services in charge of, among other things, the Research and Development Division of Remington Arms Company, Inc. Before it was disbanded, I attended the meeting of the Operations Committee.

In the time frame 1984-85 Remington was moving its company headquarters from Bridgeport, Connecticut to Wilmington, Delaware. At that time, several persons who sat on the Operation's Committee were separated from employment with Remington making restructuring of the committee system both necessary and easier to accomplish. In addition, Remington decided to restructure the committees that make business decisions for Remington. Rather than have one committee charged with the overall running of all facets

EXHIBIT I

- 2 -

of Remington's business, it was decided to form teams with more discrete functions, for example the Firearms Product Team and the Ammunition Product Team, both of which I have been a member of from time to time.

The change in business methods was more than a mere change in the names of the committees. The "Team" approach was formed as part of a reorganization effort designed to streamline and decentralize decision making and to make decision making more efficient and responsive. The change reflected and overall restructuring of the business of Remington. The change in business methodology was company wide. The change was not limited to the Ilion Plant; it was not limited to firearms; the change was not limited to the Research Section of the Firearms Division. The change was in no way motivated by Remington's decision, made several years earlier, to attempt to design a new bolt action rifle.

Further Affiant sayeth naught.

State of New York
County of Herkimer


William H. Coleman, II

On the 9th day of November, 1992

BEFORE ME appeared William H. Coleman, II who after first being duly sworn stated that the above and foregoing affidavit is true to the best of his knowledge and belief.

MARGARET D. HALL
4637696

Notary Public, State of New York
Registered in Herkimer County
My Commission Expires 1/31/93


Notary Public

My Commission Expires:

1/31/93