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* WASHINGTON STATE BAR ONLY
** OREGON STATE AND WASHINGTON STATE BARS

January 17, 1983

Peter Chamberlain
Attorney at Law
708 SW Third Avenue
Portland, OR 97204

Re: See v. Remington

Dear Peter:

Thanks for your Exhibit List. I have most of the documents but not all of them.

If at all possible, could you send me photocopies of the following exhibits:

Exhibit #30
#31
#47
#48
#49
#50
#51
#52
#53
#54
#55
#56
#59
#84

When I receive from Remington the photographs and any notes regarding testing that I'm going to introduce into evidence, I'll send them off to you promptly. I have not received them back from Remington.

January 17, 1983
Page 2

As I indicated to you, the rifles I intend to introduce include a Weatherby, Mouser, Ruger and one other, which as soon as I determine what it is I will let you know.

Very truly yours,

James D. Huegli

JDH:lr
cc: Bob Sperling
Dave Gribskov

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January 17, 1983

Burns Bros., Inc.
Sportsman Center
706 SE Union Avenue
Portland, OR 97214

Attention: Frank Briggs

Re: See v. Remington Arms
Claim No. P604-8934

Dear Mr. Briggs:

Thank you very much for seeing me in your store on January 14. Mr. Mark Ludwick of our office will pick up from your store on or about the 20th of February, four firearms which we discussed. These firearms have a two-position safety with a bolt lock much like the Remington Model 700.

As I indicated to you, these firearms will be used in a courtroom demonstration only and will not be discharged. They will be returned to you on or about March 5 in new condition, without having been used at all, in the original boxes.

Further confirming our agreement, I would appreciate a letter from you advising as to what your price on these rifles is. We have agreed, pursuant to authority from my client, Liberty Mutual, that we will pay you for "rental" 10% of the value of these rifles for the period of time which we have them in our possession.

I appreciate your help.

Very truly yours,

JDH:lr
cc: Sperling;Gribskov

James D. Huegli

Peter R. Chamberlain
 BODYFELT, MOUNT, STROUP & CHAMBERLAIN
 214 Mohawk Building
 708 S.W. Third Avenue
 Portland, OR 97204
 Telephone: (503) 243-1022

Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON

TERI SEE and DARREL SEE,)	
wife and husband,)	
)	
Plaintiffs,)	Civil No. 81-886-LE
)	
v.)	PLAINTIFFS' EXHIBIT
)	LIST
REMINGTON ARMS COMPANY, INC.,)	
a Delaware corporation,)	
)	
Defendant.)	

<u>Exhibit No.</u>	<u>Description</u>
--------------------	--------------------

- | | |
|---------------|--|
| 1. | Gun Examination Report No. 599. |
| 2. | Remington Model 700 Bolt-Action Rifle that was |
| | involved in the shooting of plaintiff, Teri See. |
| 3. | Gun Examination Report No. 62. |
| 4. | Remington Field Service Manual for Model 700 |
| | dated 3/76. |
| 5. | Gun Examination Report No. 530. |
| 6. | Gun Examination Report No. 110. |
| 7. | Gun Examination Report No. 209. |

1	8.	Gun Examination Report No. 244.
2	9.	Gun Examination Report No. 234.
3	10.	Model 700 Bolt-Action Rifle Owner's Manual dated
4		11/75.
5	11.	Gun Examination Report No. 639.
6	12.	Gun Examination Report No. 644.
7	13.	Gun Examination Report No. 500.
8	14.	Gun Examination Report No. 566 with receiving and
9		estimate report and purchase order attached.
10	15.	Gun Examination Report No. 217 with all related
11		documents attached (as produced by defendant).
12	16.	Gun Examination Report No. 52.
13	17.	Gun Examination Report No. 209 with all related
14		documents attached (as produced by defendant).
15	18.	Transmittal of drawings/parts list (3 pages).
16	19.	Gun Examination Report No. 623 with all related
17		documents attached (as produced by defendant).
18	20.	Gun Examination Report No. 431 with all related
19		documents attached (as produced by defendant).
20	21.	Gun Examination Report No. 500 with all related
21		documents attached (as produced by defendant).
22	22.	Gun Examination Report No. 592 with all related
23		documents attached (as produced by defendant).
24	23.	Gun Examination Report No. 244 with all related
25		documents attached (as produced by defendant).
26	24.	Gun Examination Report No. 106 with all related

Page 2 - PLAINTIFFS' EXHIBIT LIST

BODYFELT, MOUNT, STROUP & CHAMBERLAIN
Attorneys at Law
214 Mohawk Building
Portland, Oregon 97204
Telephone (503) 243-1022

S 0009

1 documents attached (as produced by defendant).
2 ~~25.~~ Gun Examination Report No. 52 with all related
3 documents attached (as produced by defendant).
4 ~~26.~~ Gun Examination Report No. 639 with all related
5 documents attached (as produced by defendant).
6 ~~27.~~ Gun Examination Report No. 585 with all related
7 documents attached (as produced by defendant).
8 ~~28.~~ Gun Examination Report No. 110 with all related
9 documents attached (as produced by defendant).
10 ~~29.~~ Gun Examination Report No. 62 with all related
11 documents attached (as produced by defendant).
12 ~~30.~~ Letter dated April 4, 1979, from J. A. Stekl to
13 Ray Harrison, and related correspondence
14 including Gun Examination Report No. 87.
15 ~~31.~~ Remington Model 788 Rifle.
16 ~~32.~~ Remington Model 700 Bolt-Action Rifle Owner's
17 Manual dated 9/74.
18 ~~33.~~ October 27, 1979 Clatsop County Sheriff's
19 Department Officer's Report (Laughman deposition
20 Exhibit 1).
21 ~~34.~~ Drawing of gun (Beaudreau deposition Exhibit 1).
22 ~~35.~~ Statement of Mr. Beaudreau (unsigned) (Beaudreau
23 deposition Exhibit 2).
24 ~~36.~~ Sheriff's Report (Beaudreau deposition Exhibit 3).
25 ~~37.~~ Beaudreau recorded statement (Beaudreau deposition
26 Exhibit 4).

1 ~~38.~~ Starr Beaudreau handwritten statement (Starr
2 Beaudreau deposition Exhibit 5).
3 ~~39.~~ Gun Examination Report No. 406.
4 ~~40.~~ Gun Examination Report No. 528 with all related
5 documents attached (as produced by defendant).
6 ~~41.~~ Gun Examination Report No. 46.
7 ~~42.~~ Gun Examination Report No. 140.
8 ~~43.~~ German Mauser Rifle.
9 ~~44.~~ Winchester Model 70 Rifle.
10 ~~45.~~ Remington Model 700 Rifle (with automatic safety,
11 as installed by L. S. Martin).
12 46. Springfield '03 Rifle.
13 47. Martin photograph No. 1 (trigger assembly) (and
14 blowup of same photograph).
15 48. Martin photograph No. 2 (trigger assembly) (and
16 blowup of same photograph).
17 49. Martin photograph No. 3 (trigger assembly) (and
18 blowup of same photograph).
19 50. Martin photograph No. 4 (trigger assembly).
20 51. January, 1980 photograph - Teri See's left thigh.
21 52. January, 1980 photograph - Teri See's right thigh.
22 53. January, 1980 photograph - Teri See's thighs (rear
23 view).
24 54. Columbia Memorial Hospital chart.
25 55. Medical illustration (leg muscles).
26 56. Medical bills.

1 57.. Remington Model 700 trigger assembly (current
2 design).
3 58. Remington Model 700 trigger assembly (pre-1982
4 design).
5 59.. Drawings of trigger mechanism.
6 60. Deposition of James B. McDermott.
7 61. Deposition of Daniel P. Laughman.
8 62. Deposition of Steven D. Beaudreau.
9 63. Deposition of Starr Beaudreau.
10 64. Deposition of G. A. Hernandez.
11 65. Deposition of H. G. Bentlin.
12 66. Deposition of Lawrence Pucetti.
(13 67. Deposition of James Sanders.
14 68. Deposition of Tony Varnum.
15 69. Deposition of Sidney V. Jackson.
16 70. Deposition of Gerald Cunningham.
17 71. Deposition of Fred J. Avila.
18 72. Deposition of Ronald Klosowski.
19 73. Deposition of J. Huelster.
20 74. Deposition of James C. Reddick.
21 75. Deposition of Marshall R. Hardy.
22 76. Deposition of Robert L. Joy.
23 77. Deposition of James R. Sneddeker.
24 78. Deposition of Gerald A. Hill.
25 79. Deposition of James A. Stekl.
26 80. Deposition of John Linde.

1 81. Deposition of Dennis Sanita.
2 82. Deposition of John W. Brooks.
3 83. Deposition of Paul Holmberg.
4 84. Covenant Not to Sue.
5 85. Warning tags.
6 86. Dr. Patrick's office chart.
7 87. Dr. Perrin's office chart.
8 88. Exemplar 30.06 shell.
9 89. Defendant's answers to plaintiffs' first and second
10 sets of interrogatories.
11 90. Defendant's answers to plaintiffs' requests for
12 admissions.
13 91. January 18, 1982 memo from C. E. Ritchie to C. B.
14 Workman regarding evaluation of lubricants on
15 firearms.
16 92. Memo from A. J. Long to J. H. Hennings dated
17 April 8, 1981.
18 93.
19 through
20 110. Reserved (impeachment and rebuttal).

21 BODYFELT, MOUNT, STROUP
22 & CHAMBERLAIN

23 By /s/ PETER R. CHAMBERLAIN
24 Peter R. Chamberlain
25 Of Attorneys for Plaintiffs
26