

1 Peter R. Chamberlain
 BODYFELT, MOUNT, STROUP & CHAMBERLAIN
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 3 Portland, OR 97204
 Telephone: (503) 243-1022

4 Of Attorneys for Plaintiffs
 5
 6
 7

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE DISTRICT OF OREGON

10	TERI SEE and DARREL SEE,)	
	wife and husband,)	
11)	
	Plaintiff,)	Civil No. 81-886
12)	
	v.)	NOTICE OF DEPOSITIONS
13)	
	REMINGTON ARMS COMPANY, INC.,)	
14	a Delaware corporation,)	
)	
15	Defendant.)	

16 TO: REMINGTON ARMS COMPANY, INC., and its attorney, JAMES D.
 HUEGLI
 17

18 YOU AND EACH OF YOU will please take notice that during
 19 the week of July 19 to July 23, 1982 (or as much of said week as
 20 is required to complete the below listed depositions), commencing
 21 at 9:00 a.m. each day, in the offices of Remington Arms Company,
 22 Inc., 939 Barnum Avenue, Bridgeport, Connecticut, plaintiffs
 23 will take the depositions of the individuals listed below before
 24 a person authorized to administer oaths in the state of
 25 Connecticut:

26 1. Mr. M. Hardy.

Page 1 - NOTICE OF DEPOSITIONS

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 Attorneys at Law
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 Portland, Oregon 97204
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1 2. Mr. R. L. Jay.

2 3. The persons who are identified by their initials
3 only on the 49 gun examination reports produced by defendant.

4 4. The person or persons primarily responsible for *Chesnell*
5 interpreting plaintiffs' requests for production and in locating
6 documents and producing the same on behalf of the defendant in
7 this litigation.

8 5. The person or persons primarily responsible for
9 design of the safety and trigger mechanisms on the Remington
10 Model 700 rifle.

11 6. The person or persons primarily responsible for
12 overseeing the manufacture of the Model 700 rifle during the
13 period 1976 to 1981.

14 7. The person or persons primarily responsible for
15 quality assurance ⁱⁿ ~~and~~ the manufacturing of the Model 700 rifle
16 during the period 1976 to 1981.

17 DATED this 17th day of June, 1982.

18 BODYFELT, MOUNT, STROUP & CHAMBERLAIN

19 /s/ PETER R. CHAMBERLAIN

20 By _____
21 Peter R. Chamberlain
 Of Attorneys for Plaintiffs

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CERTIFICATE — TRUE COPY

I hereby certify that the foregoing copy of Notice of Depositions
..... is a complete and exact copy of the original.

Dated June 17, 1982..

Attorney(s) for Plaintiffs

ACCEPTANCE OF SERVICE

Due service of the within is hereby accepted
on, 19....., by receiving a true copy thereof.

Attorney(s) for

CERTIFICATES OF SERVICE

Personal

I certify that on, 19....., I served the within
..... on
attorney of record for
by personally handing to said attorney a true copy thereof.

Attorney(s) for

At Office

I certify that on, 19....., I served the within
..... on
..... attorney of record for
by leaving a true copy thereof at said attorney's office with his/her clerk therein, or with a person apparently in
charge thereof, at, Oregon.

Attorney(s) for

Mailing

I hereby certify that I served the foregoing Notice of Depositions
..... on James D. Huegli
attorney(s) of record for Defendant
on June 17, 1982, by mailing to said attorney(s) a true copy thereof, certified by me
as such, contained in a sealed envelope, with postage paid, addressed to said attorney(s) at said attorney(s) last
known address, to-wit: 1200 Standard Plaza, Portland, OR 97204
and deposited in the post office at Portland, Oregon, on said day.

Dated June 17, 1982..

/s/ Peter R. Chamberlain
Attorney(s) for Plaintiffs

BODYFELT, MOUNT & STROUP

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5 Of Attorneys for Plaintiff

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8 UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF OREGON

10 TERI SEE and DARREL SEE,)
wife and husband,)
11)
Plaintiffs,) Civil No. 81-886
12)
v.)
13)
REMINGTON ARMS COMPANY, INC.,) INTERROGATORIES TO DEFENDANT
14 a Delaware corporation,) (SECOND SET)
15)
Defendant.)

16 Plaintiffs propound the following interrogatories to
17 defendant, pursuant to FRCP Rule 33, to be answered within 30
18 days of service upon defendant, separately and fully:

19 PREFATORY COMMENT

20 As used throughout these interrogatories, the term "this
21 rifle" refers to the Model 700 Remington rifle which was involved
22 in the shooting of the plaintiff, Mrs. Teri See; the term "Model
23 700" refers to the Remington Model 700 rifle designed and manu-
24 factured in the period 1976 through 1981; the term "Model 600"
25 refers to the Remington Model 600 rifle. Answers to interroga-
26 tories which require defendant to compare and contrast the Model

1 700 to the Model 600 should make such comparisons for the Model
2 600 as it existed before its major recall and after its major
3 recall.

4 INTERROGATORY NO. 25: List all parts in the bolt and
5 firing mechanism for the Model 700 that are or were interchange-
6 able with the parts in the bolt and firing mechanism for the
7 Model 600.

8
9 INTERROGATORY NO. 26: List all parts in the safety
10 mechanism on the Model 700 which are or were interchangeable with
11 the parts in the safety mechanism on the Model 600.

12
13 INTERROGATORY NO. 27: List all types of Model 700's
14 defendant manufactured during the time period from 1976 through
15 1981 (such as ADL, BDL or VAR).

16
17 INTERROGATORY NO. 28: For each of the Model 700 types
18 listed in the response to Interrogatory No. 27 state, with par-
19 ticularity, in what way the particular model type varied from the
20 other model types.

21
22 INTERROGATORY NO. 29: For each of the Model 700 types
23 listed in the response to Interrogatory No. 27 state whether or
24 not there were any differences whatsoever in the trigger mech-
25 anism between each such model type identified.

26

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1 INTERROGATORY NO. 30: For each of the Model 700 types
2 listed in the response to Interrogatory No. 27 state whether or
3 not there were any differences whatsoever in the safety mechanism
4 between each such model type identified.

5
6 INTERROGATORY NO. 31: Describe each of the trigger
7 mechanism differences referenced in your response to Interroga-
8 tory No. 29 describing, with particularity, each such difference.

9
10 INTERROGATORY NO. 32: Describe each of the safety
11 mechanism differences referenced in your response to Interro-
12 gatory No. 30 describing, with particularity, each such differ-
13 ence.

14
15 INTERROGATORY NO. 33: State whether the drawings of the
16 Model 600 previously provided by defendant to plaintiffs depict
17 the Model 600 design as it existed before, or after, its major
18 recall.

19
20 INTERROGATORY NO. 34: For each of the 49 Gun Exam-
21 ination Reports previously produced by defendant, indicate which
22 reports relate to rifles that are substantially the same in
23 design and manufacture as this rifle.

24
25 INTERROGATORY NO. 35: For each of the 49 Gun Exam-
26 ination Reports previously produced by defendant which relate to

1 rifles which are not substantially the same as this rifle, indi-
2 cate with particularity, how each such rifle differed from this
3 rifle.

4

5 INTERROGATORY NO. 36: Based upon your examination of
6 this rifle, indicate what the date of manufacture of this rifle
7 is, with as much specificity as possible.

8

9 DATED this 15th day of June, 1982.

10

BODYFELT, MOUNT, STROUP
& CHAMBERLAIN

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By

Roger L. Chamberlain
Peter R. Chamberlain, Of
Attorneys for Plaintiffs

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