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8 IN THE 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 )  
vs. )  
13 )  
14 REMINGTON ARMS COMPANY, INC., ) OBJECTION TO MOTION  
a Delaware corporation, ) FOR PRODUCTION PURSUANT  
15 ) TO FRCP 34(B)  
Defendant. )

16 Defendant in the above-captioned matter specifically  
17 objects to plaintiff's Request for Production #7, #9, #11,  
18 #12 and #13, as said Request for Production is irrelevant and  
19 immaterial. There is no allegation contained in any of  
20 plaintiff's pleadings nor is there any allegation of fact  
21 in the record that Remington Model 600 Rifle has any bearing  
22 whatsoever upon the lawsuit in this case. The rifle in  
23 question, according to paragraph 5 of plaintiff's Complaint,  
24 is the Remington Model 700. Said request is cumbersome and  
25 burdensome, and the defendant refuses to comply with this request.

26 The defendant further objects to Request for Production

Page

1 - OBJECTIONS TO MOTION FOR PRODUCTION

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1 #8, as said Request for Production is too broad to enable  
2 defendant to adequately produce said documents. If the  
3 plaintiff would specifically request which tests they are  
4 interested in, the defendant would be more adequately able  
5 to analyze this request.

6 SCHWABE, WILLIAMSON, WYATT,  
7 MOORE & ROBERTS

8 By: \_\_\_\_\_  
9 James D. Huegli, OSB #72306  
10 Attorney for Defendant  
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CERTIFICATE — TRUE COPY

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

Dated ....., 19.....

Attorney(s) for .....

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 Objection to Motion for Production on Peter R. Chamberlain, attorney(s) of record for plaintiff on February 22, 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: 229 Mohawk Building, Portland, OR 97204

and deposited in the post office at Portland, Oregon, on said day.

Dated February 22, 1982.

Attorney(s) for Defendant

SCHWABE, WILLIAMSON, WYATT, MOORE & ROBERTS ATTORNEYS AT LAW 1200 Standard Plaza Portland, Oregon 97204 Telephone 222-9981