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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,)	No. 81-886
12)	
	vs.)	
13)	DEFENDANT'S
	REMINGTON ARMS COMPANY, INC.,)	ANSWERS TO INTERROGATORIES
14	a Delaware corporation,)	(FIRST AND SECOND SETS)
)	
15	<u>Defendants.</u>)	

16 In response to Plaintiff's Interrogatories to Defendant,
17 Defendant Remington Arms Company, Inc. offers the following:

18 INTERROGATORY #1: State in detail how, if at all, the trigger
19 mechanism of this rifle differs from the trigger mechanism of the
20 Remington 600 rifle as it existed before being recalled.

21 ANSWER: See attached.

22 INTERROGATORY #2: State in detail how the safety mechanism of this
23 rifle differs from the safety mechanism of the Remington 600 rifle
24 as it existed before being recalled.

25 ANSWER: Functionally the same, but the shape is different.

26 INTERROGATORY #3: Identify what rifle models defendant has

1 manufactured in the last eight years which could be unloaded
2 (including removal of a live shell from the chamber)
3 without disengaging the weapon's safety.

4 ANSWER: M/788 and M/700.

5 INTERROGATORY #4: Identify what rifle models defendant
6 has manufactured in the last eight years which could not be
7 unloaded (including removal of a live shell from the chamber)
8 without disengaging the weapon's safety.

9 ANSWER: M/788, M/700 and M/600.

10 INTERROGATORY #5: Identify all experts you intend to call
11 as witnesses in the trial of this matter and state the substance
12 of their testimony.

13 ANSWER: Unknown.

14 INTERROGATORY #6: If plaintiff's request for admission #3 is
15 denied, state the number of occasions on which it has been reported
16 to you that a Remington Model 700 rifle fired when the safety
17 was released.

18 ANSWER: Request for Admission #3 admitted.

19 INTERROGATORY #7: Are the Remington Model 700 rifles inspected
20 by you (and mentioned in the 49 gun examination reports
21 produced by you) the same or similar to the gun involved in this case?

22 ANSWER: Yes.

23 INTERROGATORY #8: If the answer to Interrogatory No. 7 is other
24 than an unqualified "yes," state the ways in which this rifle
25 is different from each of those rifles.

26 ANSWER: Not applicable.

1 INTERROGATORY #9: State, with as much accuracy as possible,
2 the date (or year, if date cannot be determined) of manufacture
3 of each of the rifles examined in the 49 gun examination reports
4 produced by you.

5 ANSWER:

6	3/77	10/68	7/66	7/76
7	2/72	5/74	1/72	6/79
	9/76	9/78	2/79	10/72
8	5/76	7/76	7/77	6/77
	2/77	9/71	7/68	2/72
9	7/77	1/80	11/76	10/80
	12/77	6/80	11/74	7/74
10	5/76	4/81	7/78	8/76
	6/76	2/71	10/69	3/75
11	4/73	8/77	10/79	8/70
	3/79	7/79	12/74	12/70
12	7/77	8/75	11/80	8/73

13 INTERROGATORY #10: State, with as much accuracy as possible, the
14 date (or year, if date cannot be determined) of manufacture of this
15 rifle.

16 ANSWER: December, 1976.

17 INTERROGATORY #11: If plaintiffs' request for admission No. 5
18 is denied, state, with particularity, in what respects you contend
19 the rifle did not meet your manufacturing, design and/or performance
20 specifications on the date of your examination.

21 ANSWER: As far as we could see without running tests, the gun
22 met all design and performance specifications.

23 INTERROGATORY #12: If plaintiffs' request for admission No. 6
24 is denied, state, with particularity, in what respects you contend
25 the rifle was in a different condition than it was when it left
26 your hands.

1 ANSWER: Dirty and not well kept.

2 INTERROGATORY #13: If plaintiff's request for admission No. 7
3 is denied, state, with particularity, in what respects you contend
4 that it was not reasonably foreseeable.

5 ANSWER: We would expect owners of such rifles to take reasonable
6 care of the physical and mechanical portions of these rifle.

7 INTERROGATORY #14: What do you contend caused this rifle to
8 fire at the time of, and on the date of, Mrs. See's injury?

9 ANSWER: The trigger was pulled.

10 INTERROGATORY #15: State whether or not it is true that the side
11 portion of the trigger mechanism on this rifle (and other Remington
12 700 rifles) is open such that dirt, debris and other foreign
13 material could enter the trigger mechanism.

14 ANSWER: Yes, however, we are not certain as to how much dirt,
15 debris or foreign material could enter the trigger mechanism --
16 it would depend on the care of the rifle.

17 INTERROGATORY #16: If the answer to Interrogatory No. 15 is "yes,"
18 or is qualified in any way, explain why the trigger mechanism is
19 designed in that manner and state whether or not it could have been
20 designed in such a manner that such contamination could be reduced
21 or eliminated.

22 ANSWER: To examine the sear -- trigger engagement. The mechanism is
23 designed for movement and could be redesigned in several ways, all
24 of which are unknown at this time.

25 INTERROGATORY #17: On the date of manufacture of this rifle,
26 how many reports had defendant received of other Remington 700 rifles

1 discharging when the safety was disengaged?

2 ANSWER: Unknown. Records that far back are no longer available
3 due to compliance with company record retention schedules.

4 INTERROGATORY #18: Since the date of manufacture of this rifle, has
5 the defendant changed the design of the trigger mechanism or the
6 safety mechanism (or both) in any way on its Remington Model 700
7 rifle? If so, state with particularity what changes have been made
8 and the reason or reasons for each such change.

9 ANSWER: Yes. Bolt lock feature has been removed. Marketing
10 Department determined that bolt lock was no longer a feature that
11 many consumers desired.

12 (Interrogatories No. 19, 20 and 21 deleted)

13 INTERROGATORY #22: Is it true that you changed the design of
14 your Remington Model 788 from a safety which had to be disengaged
15 to unload the gun to a safety which did not have to be disengaged
16 to unload the gun?

17 ANSWER: No. (Changed bolt lock). We removed the bolt lock and
18 one of the consequences is that you can raise the bolt without
19 moving the safety.

20 INTERROGATORY #23: If the answer to Interrogatory No. 22 is "yes,"
21 state your reasons for making such a change.

22 ANSWER: Consumer desire for a bolt lock has been questioned. The
23 bolt lock was removed in 1974 on one bolt action model (Model 788)
24 to test consumer impact.

25 INTERROGATORY #24: If the answer to Interrogatory No. 22 is "no,"
26 state whether or not you ever made such a change

1 on any rifle which you manufacture, identify that rifle, and
2 state the date such change was made.

3 ANSWER: M/788, M/700.

4 In answer to Plaintiffs' Second Set of Interrogatories
5 to Defendant, Defendant Remington Arms offers the following:

6 INTERROGATORY #25: List all parts in the bolt and firing mechanism
7 for the Model 700 that are or were interchangeable with the parts
8 in the bolt and firing mechanism for the Model 600.

9 ANSWER: See attached drawings.

10 INTERROGATORY #26: List all parts in the safety mechanism on the
11 Model 700 which are or were interchangeable with the parts in
12 the safety mechanism on the Model 600.

13 ANSWER: See answer to #25 above.

14 INTERROGATORY #27: List all types of Model 700's defendant
15 manufactured during the time period from 1976 through 1981 (such
16 as ADL, BDL or VAR).

17 ANSWER: ADL, BDL, VAR, CLASSIC, C Grade, D Grade and F Grade.

18 INTERROGATORY #28: For each of the Model 700 types listed in
19 the response to Interrogatory No. 27 state, with particularity,
20 in what way the particular model type varied from the other model
21 types.

22 ANSWER: The bolt and firing mechanisms and safety mechanisms are
23 the same.

24 INTERROGATORY #29: For each of the Model 700 types listed in the
25 response to Interrogatory No. 27 state whether or not there were
26 any differences whatsoever in the trigger mechanism between each

1 such model type identified..

2 ANSWER: No difference.

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

7 ANSWER: No difference.

8 INTERROGATORY #31: Describe each of the trigger mechanism differences
9 referenced in your response to Interrogatory No. 29 describing,
10 with particularity, each such difference.

11 ANSWER: Not applicable.

12 INTERROGATORY #32: Describe each of the safety mechanism differences
13 referenced in your response to Interrogatory No. 30 describing
14 with particularity, each such difference.

15 ANSWER: Not applicable.

16 INTERROGATORY #33. State whether the drawings of the Model 600
17 previously provided by defendant to plaintiffs depict the Model 600
18 design as it existed before, or after, its major recall.

19 ANSWER: Before its major recall.

20 INTERROGATORY #34: For each of the 49 Gun Examination Reports
21 previously produced by defendant, indicate which reports relate
22 to rifles that are substantially the same in design and manufacture
23 as this rifle.

24 ANSWER: All 49 are the same design and manufacture.

25 INTERROGATORY #34: For each of the 49 Gun Examination Reports
26 previously reported by defendant which relate to rifles which are

1 not substantially the same as this rifle, indicate with
2 particularity, how each such rifle differed from this rifle.

3 ANSWER: Not applicable.

4 INTERROGATORY #36: Based upon your examination of this rifle,
5 indicate what the date of manufacture of this rifle is, with
6 as much specificity as possible.

7 ANSWER: Previously answered.

8 SCHWABE, WILLIAMSON, WYATT,
9 MOORE & ROBERTS

10 By: _____

11 James D. Huegli
12 Attorneys 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 Defendants Answers to Interrogatories
(1st and 2nd Sets) on Peter Chamberlain

attorney(s) of record for plaintiff
on July 14, 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: 708 SW Third Avenue, Portland OR 97204

and deposited in the post office at Portland, Oregon, on said day
Dated July 14, 1982.

James D. Huegel
Attorney(s) for Defendant

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BACKING SHEET