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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

TERI SEE and DARREL SEE, wife and husband, Plaintiffs, v. REMINGTON ARMS COMPANY, INC., a Delaware corporation, Defendant.	)	Civil No. 81-886
	)	INTERROGATORIES TO DEFENDANT

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

PREFATORY COMMENT

As used throughout these interrogatories, the term "this rifle" refers to the Model 700 Remington rifle which was involved in the shooting of the plaintiff, Mrs. Teri See; the term "Model 700" refers to the Remington Model 700 rifle designed and manufactured in the period 1976 through 1981; the term "identify" means to state the full name, occupation and present home and business addresses.

INTERROGATORIES

INTERROGATORY NO. 1: State in detail how, if at all, the trigger mechanism of this rifle differs from the trigger mechanism of the Remington 600 rifle as it existed before being recalled.

INTERROGATORY NO. 2: State in detail how the safety mechanism of this rifle differs from the safety mechanism of the Remington 600 rifle as it existed before being recalled.

INTERROGATORY NO. 3: Identify what rifle models defendant has manufactured in the last eight years which could be unloaded (including removal of a live shell from the chamber) without disengaging the weapon's safety?

INTERROGATORY NO. 4: Identify what rifle models defendant has manufactured in the last eight years which could not be unloaded (including removal of a live shell from the chamber) without disengaging the weapon's safety?

INTERROGATORY NO. 5: Identify all experts you intend to call as witnesses in the trial of this matter and state the substance of their testimony.

INTERROGATORY NO. 6: If plaintiffs' request for admission No. 3 is denied, state the number of occasions on which it has been reported to you that a Remington Model 700 rifle fired when the safety was released.

INTERROGATORY NO. 7: Are the Remington Model 700 rifles inspected by you (and mentioned in the 49 gun examination reports produced by you) the same or similar to the gun involved in this

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case?

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

INTERROGATORY NO. 9: State, with as much accuracy as possible, the date (or year, if date cannot be determined) of manufacture of each of the rifles examined in the 49 gun examination reports produced by you.

INTERROGATORY NO. 10: State, with as much accuracy as possible, the date (or year, if date cannot be determined) of manufacture of this rifle.

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

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

INTERROGATORY NO. 13: If plaintiffs' request for admission No. 7 is denied, state, with particularity, in what respects you contend that it was not reasonably foreseeable.

INTERROGATORY NO. 14: What do you contend caused this rifle to fire at the time of, and on the date of, Mrs. See's injury?

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INTERROGATORY NO. 15: State whether or not it is true that the side portion of the trigger mechanism on this rifle (and other Remington 700 rifles) is open such that dirt, debris and other foreign material could enter the trigger mechanism.

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

INTERROGATORY NO. 17: On the date of manufacture of this rifle, how many reports had defendant received of other Remington 700 rifles discharging when the safety was disengaged?

INTERROGATORY NO. 18: Since the date of manufacture of this rifle, has the defendant changed the design of the trigger mechanism or the safety mechanism (or both) in any way on its Remington Model 700 rifle? If so, state with particularity what changes have been made and the reason or reasons for each such change.

INTERROGATORY NO. 19: Is there any reason that this rifle cannot be redesigned in such a manner that it could be unloaded (including removal of a shell from the chamber) without disengaging the safety?

INTERROGATORY NO. 20: If the answer to Interrogatory No. 19 is "yes," state, with particularity, what the reasons are.

INTERROGATORY NO. 21: If the answer to Interrogatory No. 19 is "no," estimate what the difference in cost per rifle

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would be to implement such an alternative design.

INTERROGATORY NO. 22: Is it true that you changed the design of your Remington Model 788 from a safety which had to be disengaged to unload the gun to a safety which did not have to be disengaged to unload the gun?

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

INTERROGATORY NO. 24: If the answer to Interrogatory No. 22 is "no," state whether or not you ever made such a change on any rifle which you manufacture, identify that rifle, and state the date such change was made.

DATED this 10th day of May, 1982.

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By _____
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