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5 Of Attorneys for Plaintiffs  
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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., ) PLAINTIFFS' SECOND  
14 a Delaware corporation, ) REQUEST FOR PRODUCTION  
15 Defendants. )

16 Pursuant to FRCP 34, plaintiffs request that defendant  
17 produce for inspection and copying, within 30 days of the date of  
18 service of this request, the documents set forth below. As used  
19 in this request, the word "document" shall be given its broadest  
20 possible meaning and shall include, but not be limited to, all  
21 forms of documents set forth in FRCP 34(a). Production shall be  
22 at the offices of Bodyfelt, Mount, Stroup & Chamberlain, Room  
23 214, 708 S.W. Third Avenue, Portland, Oregon.

24 DOCUMENTS

25 1. All manufacturing, trade and governmental standards,  
26 codes or regulations with which defendant complied or attempted

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1 to comply, whether suggested, voluntary or mandatory, in and  
2 related to the design, manufacture and sale of the Remington  
3 Model 700 rifle during the period 1975 through 1981.

4 15. All test procedures and test results for all tests  
5 performed on the Remington Model 700 rifles which were the sub-  
6 ject of the 49 gun examination reports produced by defendant.

7 16. The gun examination report for defendant's examination  
8 of this rifle.

9 17. All test procedures and test results for all tests  
10 performed on the trigger mechanism of the Remington Model 700  
11 rifle in the design and manufacture of that weapon.

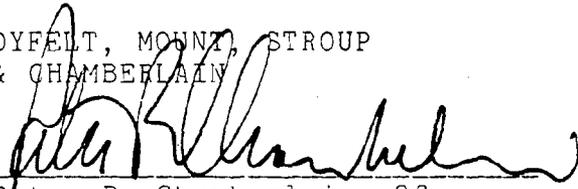
12 18. All test procedures and test results for all tests  
13 performed on the safety mechanism of the Remington Model 700  
14 rifle in the design and manufacture of that weapon.

15 19. All letters, memoranda, notes or other correspondence  
16 which gave rise to the preparation of the 49 gun examination  
17 reports previously produced by defendant.

18 20. All documents in your possession relating to the law-  
19 suits previously produced by defendant.

20 DATED this 10th day of May, 1982.

21 BODYFELT, MOUNT, STROUP  
22 & CHAMBERLAIN

23 By   
24 Peter R. Chamberlain, Of  
25 Attorneys for Plaintiffs  
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