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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF OREGON

12 TERI SEE and DARREL SEE,)
13 wife and husband,)
14)
15 Plaintiff,) No. 81-886
16)
17 vs.)
18)
19 REMINGTON ARMS COMPANY, INC.,) DEFENDANT'S ANSWERS TO
20 a Delaware corporation,) PLAINTIFF'S SECOND REQUEST
21) FOR PRODUCTION
22)
23 Defendant.)

24 In response to Plaintiffs' Second Request for Production,
25 Defendant Remington Arms Company, Inc. offers the following:

26 14. All manufacturing, trade and governmental standards,
codes or regulations with which defendant complied or attempted
to comply, whether suggested, voluntary or mandatory, in and related
to the design, manufacture and sale of the Remington Model 700 rifle
during the period 1975 through 1981.

ANSWER: There are no governmental standards, codes or regulations
pertaining to Model 700. What documents are applicable will be
produced and made available at the offices of the defendant when
depositions are taken of the defendant's employees on the east coast.

1 15. All test procedures and test results for all
2 tests performed on the Remington Model 700 rifles which were the
3 subject of the 49 gun examination reports produced by defendant.

4 ANSWER: The test results already produced. Procedures can be
5 specified by Remington employees when depositions are taken. The
6 procedures vary greatly.

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

9 ANSWER: Attached.

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

13 ANSWER: All test results marked on gun. Procedures can be
14 made available or explained when depositions are taken of defendant's
15 employees on the east coast.

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

19 ANSWER: See 17.

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

23 ANSWER: A list is currently being compiled and will be forwarded
24 as soon as possible. The original letters are not kept with the
25 reports and are kept in another department in chronological order.

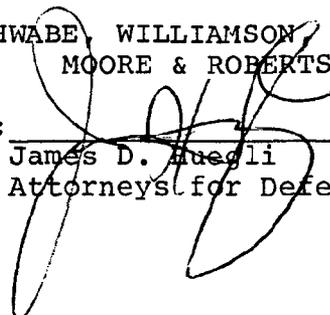
26 It will take a great amount of time to go through all of these files

1 and match all the letters to the reports.

2 20. All documents in your possession relating to the
3 lawsuits previously produced by defendant.

4 ANSWER: Already provided copies of all pleadings we have in
5 our files under cover lated dated April 28, 1982.

6 SCHWABE, WILLIAMSON, WYATT,
7 MOORE & ROBERTS

8 By:  _____
9 James D. Huedli
10 Attorneys for Defendant

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 Request for Production on Peter Chamberlain, attorney(s) of record for plaintiff on July 14, 19 82, 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, 19 82

James D. Hughes Attorney(s) for defendant

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