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June 30, 1982

* WASHINGTON STATE BAR ONLY
** OREGON STATE AND WASHINGTON STATE BARS

Peter Chamberlain
Attorney at Law
222 SW Morrison Street
Portland, OR 97204-3188

Re: See v. Remington Arms

Dear Peter:

On June 29 I had a telephone conference with Mr. Sperling, counsel for Remington Arms. All of the matters regarding the interrogatories and request for production will be in on time.

In relationship to the deposition, we have run into one problem. Remington Arms will be closed the first two weeks of August. Therefore, the first date that is available for these depositions is Monday, August 16 for the rest of that week. Mr. Spurling will make these individuals available on a voluntary basis from Monday, August 16, through Friday, August 20. We would therefore appreciate your cooperation in rearranging the depositions scheduled for that time.

Furthermore, I will be on vacation during the last two weeks of July and I have been asked by Remington Arms to be present and available for these depositions.

Next, the depositions should be taken not in the offices of Remington Arms in Connecticut, but actually at the plant where these people work in Illion, New York. This is about an hour and a half drive from Syracuse where your plane would land.

The individual who actually designed the Remington 700 Rifle is no longer an employee of Remington and is retired. His name is Mike Walker and he lives during the summer, we believe, in Illion, New York.

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R. B. SPERLING

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Furthermore, Mr. Joy and Mr. Hardy, who you have asked to depose, we believe, would be inappropriate individuals and may simply be a waste of your time. Although these individuals' initials do appear on the gun reports, their involvement was simply to bring the guns physically into the testing laboratory and to check the corresponding serial numbers. They had no responsibility and took no part in the examination or testing of these rifles.

The person primarily responsible for interpreting the requests for production will be Mr. Jim Stekel and he will be available. The rest of the individuals will also be available.

If this is convenient with you, Peter, we would appreciate the depositions commencing on Monday morning, August 16. Since this is vacation time I would appreciate you confirming this as soon as possible so that this matter can move forward.

I am sending a copy of this letter to Judge Leavy and asking that he extend the deadline for completion of discovery to the end of August with a corresponding date for the lodging of the Pretrial Order to the end of August.

Lastly, Bob Sperling, who is counsel for Remington Arms, is not available at all for these depositions during July 19 through July 23, as he is heavily involved in a trial in Connecticut at that time.

May I hear from you?

Very truly yours,

James D. Huegli

JDH:lr

cc: Judge Leavy
Bob Sperling
Chuck Jackson

P.S. Peter, confirming our conversation of June 29, we will commence the depositions in this case Monday, August 16 at 1:30 p.m. in the offices of Remington Arms in Illion, New York. The witnesses will be available.

JDH