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July 14, 1982

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Re: See v. Remington Arms

Dear Peter:

Thanks for your letter of July 9. I believe that my client has complied with most, if not all, of your requests. I have asked them to get whatever else they can regarding the "lawsuits" and other "claims" in response to numbers 5, 7 and 20. They, I believe, provided you with all documents regarding the recall of the 600.

As far as the tests are concerned, I have asked them to prepare a brief index if they are able to do that. I don't know whether we are talking about tests as to how much the gun weighs, what the muzzle velocity is, whether it's a marketable product, etc., but I am asking them to use their own judgment as best they can.

They have already provided you with the information in requests numbers 11 and 12 regarding redesign of the Model 600 trigger and in fact, have provided you with diagrams in that regard.

As far as number 16 is concerned, all they have is a copy of Chisnell's report. They don't have a gun examination report similar to the other gun examination reports as I understand it.

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As far as insurance policies are concerned, your lawsuit is for \$250,000 and we've provided information that we have at least one million dollars worth of liability insurance. No useful purpose can be served going into umbrella and excess policies for Remington Arms, which has been in existence over 100 years.

Very truly yours,

James D. Huegli

JDH:lr  
cc: Bob Sperling  
Chuck Jackson

24052

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July 23, 1982

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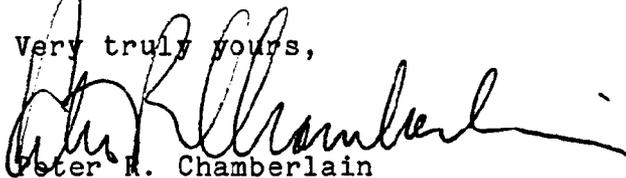
Dear Jim:

Re: See v. Remington

Your client provided us with two field service manuals in the captioned matter. The two versions are coded "FGH-RES 569" and "JPL-RES 3-76." As to the latter manual, the copy I received contained two page twos and no page three. I would appreciate it if you could alert your client to this fact and have them forward a copy of page three. / *no 3rd pg.*

One of the people I want to depose during the week of August 16, 1982, is Mr. J. A. Stekl. I think, but cannot be certain, that his initials appear on several of the gun examination reports. Regardless of whether those are his initials, I do want to take his deposition. As per our prior agreement, I understand that you will not require me to file a notice of deposition as to this gentleman. If this is contrary to our understanding, please let me know at once.

Very truly yours,



Peter R. Chamberlain

PRC:imp