

Van Balthusen tel 7/9/71
Montgomery Ward -

Greensburg, Pa law suit - injury -

700 30/06 # 6372713 (sic)
"blow up" leg hurt??

Shipped 10/27/70 from Fabr to M. W. store -

Order # R41199 Fabr shipment to store -

G Rockwell
7/9/71 3:45p

(N.H. Hotel Inn - next week)

He'll tell his lawyers to contact you Earl. -

RECEIVED

JUL 9 - 1971

R. B. SPERLING

RECEIVED

JUL 9 1971

E. G. LARSON

3:45

April 30, 1971

William C. Stillwagon, Esq.
Boyle, Makles, Reeves & Stillwagon
15 East Otterman Street
Greensburg, Pennsylvania 15601

IN RE: THOMAS JOHN BROWN

Dear Attorney Stillwagon:

In checking our files, we find we have not received a reply to our Mr. E. G. Larson, Manager, Field Service and Promotion, letter of March 12, 1971.

We are most interested in looking into this matter further and would like to know if the rifle and ammunition have been shipped.

Many thanks for your cooperation and we look forward to receiving the exhibits in question.

Sincerely,

REMINGTON ARMS COMPANY, INC.

J. H. Chinnell
Supervisor, Product Service

JEC/es
cc: Montgomery Ward - Mr. Dennis B. Clark

bcc: Liberty Mutual (3)
E. B. Sperling

FILE: BROWN
P.I.

March 12, 1971

William C. Stillwagon, Esq.
Boyle, Nakles, Reeves & Stillwagon
15 East Otterman Street
Greensburg, Pennsylvania 15601

IN RE: THOMAS JOHN BROWN

Dear Attorney Stillwagon:

I have your letter of March 8 advising that you represent Mr. Brown who was injured while using a Remington caliber 30-06 Model 700 rifle.

We were indeed sorry to learn of Mr. Brown's injury and trust that by now he has fully recovered. We can assure you that we are most interested in determining the cause of the accident, and in order to do so, ask that you kindly forward to us here in Bridgeport, via Railway Express, marked to the attention of the writer, the fired shell that was in the rifle at the time, plus any loaded rounds left from the box of ammunition in use, and the original box in which they were packaged. In order to comply with transportation regulations, we ask that you return to us, in its entirety, the Model 700 rifle in a separate package.

When received, both exhibits will be thoroughly examined by our technicians, after which, we will advise you of our findings. We assure you that no changes will be made to the exhibits, but we do ask your permission to fire a few of the loaded rounds to obtain their ballistic values (if they are of our manufacture).

Thank you for your letter, and we await the opportunity to be of further service.

Cordially yours,

E. C. Larson, Manager
Field Service and Promotion

EGL:th

*Jack
lawyer -
will try to
return gun!*

Certified

*notified
Recd.
4-2-71*

*Clark
corp*

*no
out Clark
of 5-12-71
for*

E. G. Larson



MONTGOMERY WARD

Regional Law Department 1000 S. Monroe St., Baltimore, Maryland 21232 • Telephone 837-8000

March 30, 1971

Remington Arms Company
939 Barnum Avenue
Bridgeport, Connecticut 06602

Attention: ~~Mr. George Rockwell~~

Re: Thomas John Brown
(Charles Kuncher)
PL 1-64436

Gentlemen:

Please be advised that the above-captioned has made claim against us for personal injuries allegedly sustained when a "defective" rifle, Remington 30.06, Model 700, purchased from us and manufactured by you, discharged and shot through his foot. The rifle was purchased by Mr. Charles Kuncher, Derry, Pennsylvania, at our Greengate Mall store, Greensburg, Pennsylvania, in December, 1970.

Mr. Brown is represented by William C. Stillwagon of Boyle, Nakles, Reeves and Stillwagon, 15 East Otterman Street, Greensburg, Pennsylvania, 412-837-1770.

Please investigate, indemnify and hold us harmless in this matter and advise us periodically as to the status of this claim.

Very truly yours,

MONTGOMERY WARD & CO., INCORPORATED

Dennis B. Clark
Dennis B. Clark
Regional Claims Supervisor

DBC:cb

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED

APR 1 1971

G. G. D. ROCKWELL

RECEIVED

APR 1 1971

E. G. LARSON

RECEIVED

APR 01 1971

PRODUCT SERVICE

P.I.

LAW OFFICES
BOYLE, NAKLES, REEVES & STILLWAGON

18 EAST OTTERMAN STREET
GREENSBURG, PENNSYLVANIA 15601

EMMETT C. BOYLE, JR.
NED J. NAKLES
LEONARD R. REEVES
WILLIAM C. STILLWAGON
ROBERT P. BOYER
WILLIAM D. BOYLE
JAMES H. JOSEPH
RICHARD A. HARWICK
JAMES R. McDONALD

AREA CODE 412
837-1770

March 8, 1971

RECEIVED
MAR 12 1971
PRODUCT SERVICE

Remington Firearms Company
Peters Cartridge Division
Bridgeport, Connecticut 06602

In re: Thomas John Brown

Dear Sirs:

I wish to inform you that our firm has been retained to represent Mr. Thomas John Brown who was injured when a defective Remington 30.06, Model 700 Rifle purchased from Montgomery Wards discharged and shot through his foot.

The purchase of this rifle was made by Mr. Charles Kuncher of Derry, Pennsylvania, in December of 1970.

Would you please contact me within the very near future regarding this matter; or if you are insured, submit this letter to your insurance carrier and ask them to contact me.

Thank you for your kind cooperation, I will remain

Yours very truly,

BOYLE, NAKLES, REEVES & STILLWAGON

William C. Stillwagon
William C. Stillwagon

WCS/ljp