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SEP 8 - 1980

R. B. SPERLING

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JUAN LOPEZ

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V.

C.A. NO. C-80-120

REMINGTON ARMS
COMPANY, INC.

REQUEST FOR PRODUCTION

TO: Plaintiff, Juan Lopez and his attorney in charge, Gerald
H. Beckman, 3301 Ayers, Corpus Christi, Texas 78415.

Pursuant to Rule 34, Federal Rules of Civil Procedure, you are requested to make available to Defendant, Remington Arms Company, Inc. and its attorney the following items for inspection, testing and copying at the office of your attorney, Gerald H. Beckman, 3301 Ayers, Corpus Christi, Texas 78415 on Friday, October 24, 1980 at 10:00 a.m., said items to be released to Defendant and its attorney at that time for inspection, non-destructive testing and/or copying at Defendant's expense, to be returned to Plaintiff's attorney in the same condition within thirty (30) days. The items you are requested to produce are as follows:

- (1) The rifle in question in this lawsuit, along with any parts or attachments thereto that may have been a part of the rifle at the time of the occurrence in question in this lawsuit including, but not limited to telescopic sights, slings, etc..
- (2) All receipts, cancelled checks, bills of sale or other items indicating prior ownership of the rifle in question in this lawsuit by Plaintiff, Juan Lopez, or any other person or any sale or transfer of the rifle in question in this lawsuit to Plaintiff, Juan Lopez or any other person.

- (3) The reports of any person whom Plaintiff expects to call as an expert witness at trial which contain the subject matter on which the expert is expected to testify and/or contains facts and/or opinions to which the expert is expected to testify, including, but not limited to the physical condition of the Plaintiff, Juan Lopez, the rifle in question in this lawsuit and the manner in which the occurrence in question took place.
- (4) Copies of Federal Income Tax returns, including but not limited to W-2 forms filed by the Plaintiff, Juan Lopez, with the Internal Revenue Service within the last five (5) years.

Respectfully submitted,

BY: _____

J. ROBERT MCKISSICK

ATTORNEY IN CHARGE FOR DEFENDANT,
REMINGTON ARMS COMPANY, INC.

Post Office Box 2446
Corpus Christi, Texas 78403
512/884-3551

OF COUNSEL:

KLEBERG, DYER, REDFORD & WEIL

CERTIFICATE OF SERVICE

I certify that a copy of the Request For Production has been served upon counsel for Plaintiff, Gerald H. Beckman, by mailing the same to him by Certified, First-Class United States mail, properly addressed and postage prepaid at the same time the original was mailed for filing with the clerk of this Court on this the _____ day of September, 1980.

J. ROBERT MCKISSICK