

NO. 10,902

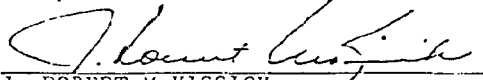
JUAN LOPEZ	§	IN THE 229TH JUDICIAL
	§	
VS.	§	DISTRICT COURT OF
	§	
REMINGTON ARMS CO., INC.	§	DUVAL COUNTY, TEXAS

NOTICE OF FILING OF PETITION  
AND BOND FOR REMOVAL

TO: GERALD H. BECKMAN, Huerta, Pena, Beckman & Rodriguez,  
Post Office Box 7219, Corpus Christi, Texas 78415,  
Attorneys for Plaintiff in the above-styled and -numbered  
cause.

Please take notice that Defendant, REMINGTON ARMS CO.,  
INC., on September 2, 1980, filed in the United States  
District Court for the Southern District of Texas, Corpus  
Christi Division, a Petition and Bond for the removal of the  
above-styled and -numbered cause from the 229th Judicial  
District Court of Duval County, Texas, copies of which are  
hereto attached.

Dated this 2nd day of September, 1980.

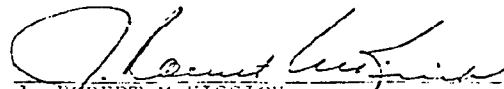
  
J. ROBERT MCKISSICK  
Attorney-in-Charge for Defendant

OF COUNSEL:

KLEBERG, DYER, REDFORD & WEIL  
Post Office Box 2446  
Corpus Christi, Texas 78403

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the fore-  
going Notice of Filing of Petition and Bond for Removal has  
been served on counsel for Plaintiff, GERALD H. BECKMAN, Post  
Office Box 7219, Corpus Christi, Texas 78415, by depositing  
same with the United States Postal Service properly addressed  
with proper First Class Certified Mail, Return Receipt  
Requested, postage prepaid on this 2nd day of September,  
1980.

  
J. ROBERT MCKISSICK

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

JUAN LOPEZ,  
Plaintiff

V.

REMINGTON ARMS COMPANY,  
INC.,  
Defendant

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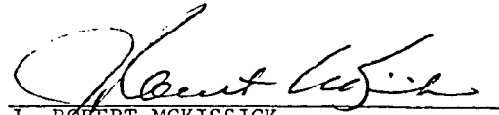
C.A. NO. 80-120

FIRST INTERROGATORIES OF DEFENDANT,  
REMINGTON ARMS COMPANY, INC. TO PLAINTIFF

TO: JUAN LOPEZ, Plaintiff, and his attorney of record,  
Gerald H. Beckman, Post Office Box 7219, Corpus Christi,  
Texas 78415.

Please take notice that pursuant to Rule 33, Federal Rules  
of Civil Procedure, the following Interrogatories are submitted  
to be answered by you. Such answers shall be signed and sworn  
to and shall be served on the undersigned within thirty (30) days  
of the date these Interrogatories are served on your attorney of  
record.

DATED this 4th day of September, 1980.

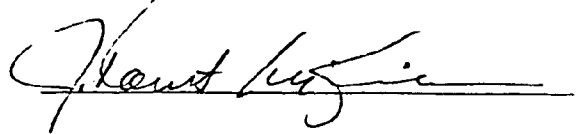
  
J. ROBERT MCKISSICK

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

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

CERTIFICATE OF SERVICE

I certify that a copy of the attached Interrogatories have  
been served upon counsel for Plaintiff, Gerald H. Beckman, by mail-  
ing 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  
4th day of September, 1980.



The Interrogatories you are requested to answer are as follows:

- (1) Please state specifically the nature of the injuries you claim to have received in the occurrence made the basis of this lawsuit and, if you claim that you have not recovered from such injuries, state what complaints you still have.
  
  
  
  
  
  
  
  
  
  
- (2) If you have at any time prior to the occurrence in question received medical attention for any injury or illness, please give the following information:
  - (a) The name and address of each physician or other practitioner of the healing arts administering treatment for such injury or illness;
  
  
  
  
  
  
  
  - (b) The name and address of each hospital, clinic, sanitarium, nursing home or other institution in which you were hospitalized or received treatment;

- (c) A full description of each such injury or illness and the dates on which you received medical treatment or were hospitalized.

- (3) If you have at any time since the occurrence in question received medical attention, for any reason, please give the following information:

- (a) The name and address of each physician or other practitioner of the healing arts administering treatment;

- (b) The name and address of each hospital, clinic, sanitarium, nursing home or other institution in which you were hospitalized or received treatment;

(c) The dates on which you consulted each physician or were hospitalized, and the total charges for each consultation or hospitalization.

(4) State the name and address of each employer for whom you have worked (if self-employed so state) both prior to and since the date of the occurrence in question giving the dates of each employment.

- (5) State the amount of wages or income, if any, you claim to have lost as a result of the occurrence made the basis of this lawsuit and explain in detail the method by which you calculated this amount.
- (6) Explain in detail what other expenses and/or monetary losses you claim to have occurred as a result of the occurrence made the basis of this lawsuit other than medical expenses incurred in the past and lost of wages and income in the past.
- (7) If you have ever made any claim for damages or injuries received in any accident or occurrence other than the claim asserted in this lawsuit, please explain each such claim in detail.

(10) Describe in detail your version of the occurrence made the basis of this lawsuit, giving the names and addresses of each person having knowledge of any facts relevant to such occurrence.

(11) Describe in detail the ownership history of the rifle made the basis of this lawsuit including, but not limited to the dates of ownership and the manner in which the rifle was obtained by each person who has owned the rifle.

(12) Is the total amount of actual monetary damages that you claim as a result of the occurrence made the basis of this lawsuit in excess of ten thousand dollars (\$10,000.00)?

(13) State the name and address of any persons other than the Plaintiff, Juan Lopez that has repaired, serviced, altered, or made any change whatever to any part or parts of the rifle in question in this lawsuit at any time.