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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

TERI SEE and DARREL SEE,)
wife and husband,)
Plaintiffs,)
vs.) Civil No. 81-886
REMINGTON ARMS COMPANY, INC.,)
a Delaware corporation,)
Defendant.)

TELEPHONE DEPOSITION OF JAMES C. REDDICK
Taken in behalf of the Plaintiffs

BE IT REMEMBERED That, pursuant to oral stip-
ulation hereinafter set forth, the telephone deposition of
JAMES C. REDDICK was taken in behalf of the Plaintiffs, before
Patricia Williams, a Notary Public for Oregon, on Thursday,
August 5, 1982, beginning at 5:00 p.m., in the law offices of
Bodyfelt, Mount, Stroup & Chamberlain, 214 Mohawk Building,
708 Southwest 3rd Avenue, Portland, Oregon.

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APPEARANCES:

Mr. Peter R. Chamberlain, appearing in behalf of Plaintiffs
Teri See and Darrel See;
Mr. James D. Huegli, appearing in behalf of Defendant
Remington Arms Company, Inc.

EXAMINATION INDEX

Examination by:	Pages
Mr. Chamberlain	4 & 22
Mr. Huegli	10

COMPUTER ASSISTED TRANSCRIPTION

-BY-

GEESMAN & ASSOCIATES
310 S. W. 4TH, Suite 512
Portland, Oregon 97204
(503) 222-3222

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(At said time and place the following stipulation was entered into between the attorneys present in behalf of the respective parties:)

It is hereby stipulated and agreed by and between the parties hereto, through their respective attorneys of record, that the telephone deposition of JAMES C. REDDICK may be taken in behalf of the Plaintiffs at the time and place set forth in the caption hereof, before Patricia Williams, a Notary Public for Oregon, and in stenotype by the said Patricia Williams.

It is further stipulated that the deposition when fully transcribed, may be used in the trial of the above-entitled action as by the law and the Rules of Civil Procedure for District Courts of the United States provided; that all questions as to the notice of the time and place of taking the same are waived; and that all objections as to the form of questions are waived unless objected to at the time the questions are asked, but that all objections as to materiality, relevancy and competency of the questions and answers are reserved to the parties until the time of trial.

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JAMES CALVIN REDDICK

was thereupon produced as a witness in behalf of the Plaintiffs and, having been first duly sworn on oath, was examined and testified as follows:

EXAMINATION

(BY MR. CHAMBERLAIN):

Q. Mr. Reddick, could you please spell your full name for the record?

A. Okay. It's James Calvin Reddick, J-a-m-e-s, C-a-l-v-i-n, R-e-d-d-i-c-k.

Q. And what is your address?

A. I live at 920 West Lake Cannon Drive, in Winter Haven, Florida.

Q. Is that your permanent residence?

A. Yes, it is.

Q. Now, I understand that you are the owner of a Remington rifle?

A. Yes, I own several.

Q. Okay. Is one of them a Remington 700?

A. Yes.

Q. About when did you purchase that?

A. The rifle that you're speaking of was purchased somewhere in the early 1970's. I've been unable to find the exact date. The person I purchased it from is

1 on vacation and I can't get the date. But it was in
2 1970, '71 or '72, probably one of those three years.

3 Q. You purchased it new?

4 A. Yes.

5 Q. And do you remember the model number?

6 A. 700 ADL.

7 Q. Is that "A" as in apple, "D" as in David, "L" as in
8 Larry?

9 A. There is no "E".

10 Q. No, "A" as in apple?

11 A. Right.

12 Q. And what is the caliber?

13 A. It's a 30 aught 6.

14 Q. 30 aught 6. Can you tell me a little bit about the
15 maintenance you've given the gun over the time that
16 you've owned it and the general condition of the gun?

17 A. Well, the gun remained in my closet probably five
18 years, or maybe six, before I ever fired it. I bought
19 it because it was a good buy and I thought some day I
20 might need one. And then, I started using it hunting.

21 The first thing I did with it was take it to a
22 gunsmith and have it scoped and the recoil pad mounted
23 on it, and he test fired it, zeroed it in for me --
24 which was the first time it had ever been fired -- and
25 then I started using it for hunting.

1 Generally, I take pretty good care of my guns. I
2 own quite a few guns, and I give them pre-season and
3 post-season cleaning and periodic cleaning after I've
4 used them; you know, swabbed down the barrel, kind of
5 thing, and make sure that they're in good shape.

6 Q. Okay. Do you still own this gun?

7 A. Beg your pardon?

8 Q. Do you still own the rifle?

9 A. Yes, I do.

10 Q. Do you know the serial number?

11 A. I have it real close to me here. I can get it for you.
12 Just one moment. Okay. The serial number is 3590929.

13 Q. Now, I understand you've had some problems with this
14 rifle?

15 A. Yes, I have.

16 Q. Could you describe for us what that problem is and tell
17 us a little bit about it?

18 A. Let me just put it back into the case so I won't have
19 to leave it on the floor. Just a second.

20 Okay. I can't be sure about the date because the
21 first or second year that I used the gun hunting, I was
22 hunting in one of the local wildlife management areas
23 with my two sons, and at the particular time, we were
24 riding on tailgate of a Bronco that we had -- standing
25 up on the tailgate -- one of my sons and I. The rifle

1 was loaded, and I decided to unload it and get inside
2 the car.

3 And I'm not too clear about this particular time, as
4 to whether I was specifically unloading the gun or just
5 thinking in terms of unloading the gun, but in any
6 event, the gun fired. And, of course, I had the gun,
7 you know, pointed in the air, and so forth. So --
8 well, out of the way.

9 Q. What did you do right before the gun fired? What were
10 you doing?

11 A. Well, I'm not sure if I, at that time, was trying to
12 release the safety or not. I think probably I was, but
13 I can't be sure at the present time. But it did
14 surprise me that the gun went off, because I was
15 thinking certainly there was no reason for the gun
16 going off.

17 Q. Did you have your finger on the trigger?

18 A. I'm not sure at that particular time. I'm not -- I
19 don't think it was, but I'm not sure. It's not a
20 practice of mine to keep a finger on the trigger unless
21 I'm thinking in terms of shooting the gun. But at that
22 time, I cannot be sure.

23 Q. Now, did this occur again?

24 A. Yes, it happened again approximately two years ago.
25 Again, I was hunting and I had arrived back in my hunt

1 camp and I was unloading the gun to get ready to take
2 it inside my trailer, and I had the gun pointed in the
3 air, as I usually did, and removed the safety and the
4 gun fired.

5 Q. When you say you removed the safety ----

6 A. I pushed -- on that particular model, you have to push
7 the safety in order to unload it.

8 Q. It's moving the safety from the on-safe position to the
9 fire position?

10 A. Right. And my finger was definitely nowhere near the
11 trigger at that time.

12 Q. Was there anything else, any foreign object, any part
13 of your body that might have been near the trigger?

14 A. No, I was holding the gun with it put on my knee and
15 unloading. I was unloading as properly as I could, and
16 it fired.

17 Q. Okay. Then what happened next?

18 A. Okay. The next time it happened was -- let's see. I
19 believe it was in January. Let me just check the date,
20 check my notes here.

21 I believe it was January 1981, and I had been out
22 hunting, and -- to no avail -- and when I came out of
23 the woods back to my car -- my Chevy Blazer -- I put
24 the gun inside its case because it was dark and you
25 can't hunt any longer.

1 I drove back to my camp and when I got to my camp,
2 I left the gun laying across the two front seats of my
3 car. And sometime later, probably a couple hours
4 later, I came to go to bed, and I was thinking that I
5 hadn't unloaded my gun. So, I walked out to my car and
6 unlocked it, opened the door, unzipped the case to put
7 it in and reached down to push the safety in order to
8 unload the gun, and the gun fired.

9 This time, the bullet went through both seats of my
10 car and exited out the far side door of the car and
11 punctured the tire on my hunting buggy, and that upset
12 me quite a bit. So, at that time, I decided I didn't
13 want to use the gun anymore.

14 Q. On this third occasion that you've just described for
15 us, did you have your finger or any part of your body
16 near the trigger of the gun?

17 A. Definitely not.

18 Q. Was there anything else in your gun case or near it
19 that might have been exerting pressure on the trigger?

20 A. No. I unzipped the gun case, and the barrel was still
21 inside the case because the part I was working with, of
22 course, is completely uncovered, and I very carefully
23 was trying to unload the gun.

24 Q. Now, am I correct in my understanding that this
25 particular model of rifle cannot be unloaded without

1 putting the safety from the on-safe position to the
2 fire position?

3 A. That's right. You can't remove the bolt -- you can't
4 bring the bolt back to unload it without putting the
5 gun on the fire position.

6 Q. Okay.

7 MR. CHAMBERLAIN: Thank you very much, Mr.
8 Reddick. Mr. Huegli may now have a few questions for
9 you.

10 EXAMINATION

11 (BY MR. HUEGLI):

12 Q. Mr. Reddick, do you own other rifles?

13 A. Yes, I do. I own several rifles, and my two sons own
14 model 700's.

15 Q. And do they all have the same safety mechanism?

16 A. Yes, I believe so. The other two guns are my boys'.
17 I'm certain that they have the same safety mechanism.
18 I was just trying to think if you can unbolt them
19 without releasing the safety. I don't believe you can
20 on those two guns that my boys own.

21 Q. Have your boys had any problems with their guns?

22 A. No.

23 Q. Okay. So, just your gun?

24 A. Yes, my gun has been the only one. The boys' are much
25 newer models than mine.

1 Q. Okay. And was your gun built in the early '70's?
2 A. I really don't know when it was built. A friend of
3 mine had a gunshop and was going out of business, and
4 as near as I can pinpoint it, I called his brother
5 today and asked him if he remembered when he closed out
6 his gunshop. And he said, "The best I can tell you is
7 early 1970." I really can't give you any closer time
8 than that.
9 Q. All right. You didn't buy it new then?
10 A. Yes, I bought it new.
11 Q. You sent it back to Remington, did you not?
12 A. Yes, I did.
13 Q. Did you or anybody else adjust the trigger screws on
14 that gun?
15 A. To my knowledge, no one adjusted it. Now, when
16 Remington contacted me, they said that someone had been
17 inside the trigger, but it didn't happen with my
18 knowledge.
19 Q. Do you know of anybody who might have adjusted the
20 trigger screws?
21 A. There's a possibility that the man who mounted the
22 scope adjusted them, but I can't be sure of that.
23 Q. Okay.
24 A. I have several guns, and somewhere amongst the line,
25 someone told me about one of my guns that the trigger

1 was a little tight, and they had loosened it. To be
2 frankly honest with you, I don't know if it was this
3 gun or not.

4 Q. Okay. So, do you know then whether or not the gun --
5 the trigger mechanism was in the same condition when
6 the episode happened as when it came from the factory?
7 Can you tell us about that?

8 A. As a matter of fact, I can't tell you about that
9 because I didn't inspect it before I went to Remington
10 Arms.

11 Q. Okay. We have a test report here -- Mr. Chamberlain
12 and I -- that's in front of us, that, I think, is going
13 to be in evidence, probably, in this case. And there
14 are going to be questions about the test reports, those
15 where there was red glue on the adjusting screws. Do
16 you recall ever seeing a red glue on the adjusting
17 screws?

18 MR. CHAMBERLAIN: I'll object.

19 THE WITNESS: I never looked at the trigger.
20 I was hesitant to send the gun to Remington without
21 having it inspected first, because it had been
22 adjusted, and sure enough, they came back and they told
23 me that it had been adjusted.

24 (BY MR. HUEGLI):

25 Q. Why were you concerned about that?

1 A. Well, I felt that there was a liability involved, and I
2 knew that the gun -- since it was new -- I felt that
3 Remington was responsible for the damage that had
4 occurred. And had the damage been to a greater extent,
5 I probably would have had the gun inspected before I
6 went to Remington. But when Remington came back and
7 told me -- and, you know, I'm trying to be perfectly
8 honest with both parties. When Remington came back and
9 said the trigger guard assembly had been tampered with,
10 my first reaction was, "Well, that's why I didn't want
11 to send it, because that's what I thought you were
12 going to do," what they told me.

13 In retrospect, and trying to determine if it could
14 have possibly happened, the only time it would have
15 been out of my possession overnight was when the man
16 mounted the scope on it. And he was a licensed
17 gunsmith, and he mounted the scope on it and mounted
18 the recoil pad and test fired the gun.

19 Now, I've had similar things done to several of my
20 guns, but somewhere along the line, someone made a
21 mention to me that "The trigger was a little tight, and
22 I loosened it up a little bit for you."

23 Now, I just don't know if it was that gun or not.
24 I really don't think it was, but thinking doesn't count
25 much, I understand.

- 1 Q. Have you had any trouble with the gun since you got it
2 back from Remington?
- 3 A. No, I haven't, but realize, with hunting guns, you
4 don't shoot them an awful lot. You take them out each
5 year and fire them three times and the scope is zeroed
6 in and you go hunting. But I have been extremely leery
7 of the gun ever since, and I have been extremely
8 careful and worrisome with my boys' 700's.
- 9 Q. What do you think caused this gun to fire?
- 10 A. Well, I think that -- my opinion is, that because of
11 the design of the gun, that probably somewhere during
12 the course of handling the gun with the safety on, your
13 finger comes in contact with the trigger and something
14 inside must release when you take the safety off. I
15 don't think it is, certainly, a normal situation.
- 16 Q. Do you know if your gun is any different than your
17 boys' guns?
- 18 A. No, I really don't know. They are both the same model;
19 they're different caliber. And the boys' guns were
20 purchased about three years ago.
- 21 Q. You've never taken your trigger assembly apart?
- 22 A. No.
- 23 Q. You've never soaked it in diesel oil?
- 24 A. No.
- 25 Q. What was the temperature when this happened, this one

1 where you shot through the car door?
2 A. The temperature was between forty and sixty.
3 Q. Okay.
4 A. It was January, and it probably was cold for us in
5 January.
6 Q. Was it dark when you reached in the case to pull the
7 gun out?
8 A. Yes. It was after dark, yes, but it was well lit
9 inside the vehicle. I have lights in there.
10 Q. Were you going to take the gun out of the car?
11 A. No.
12 Q. Were you ----
13 A. I was going to unload it and leave it right where it
14 was.
15 Q. Now, Remington sent you a letter back, did they?
16 A. Yes.
17 Q. Do you have it?
18 A. Yes, I do.
19 Q. Can you read it to us?
20 A. Okay. It says ----
21 Q. Could you read your letter to them?
22 A. Okay.
23 Q. Give us the date of it.
24 A. The date was March 3rd, 1981. It reads, "Dear Mr.
25 Stekl --" ----

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MR. CHAMBERLAIN: Mr. Reddick, the court reporter is having difficulty hearing you. Could you repeat that?

THE WITNESS: Oh, I'm sorry. I should have realized that you're trying to take this down and since it's long distance, it may not be a good connection.

It's addressed to Remington Arms, attention Jim Stekl. "Dear Mr. Stekl; Mr. Dennis Sanita asked me to send this letter directed to your attention. This gun has fired three separate times now as the safety was released. The first time, I wondered if my finger was near the trigger, but I was certain it was not. The second time it happened, I was unloading it and pushed the safety lever forward so I could unload it, and the gun fired as the safety went forward. My finger was nowhere near the trigger.

The last time was the most frightening. After being loaded and standing next to a tree in the evening, I put the gun in its leather case and placed the gun across the front seat of my Chevrolet Blazer. Before going to bed, however, I realized the gun should be unloaded. I opened the door on the driver's side of the car, moved the gun without the case out of the door with the front of the case still laying on the front of the seat. I unzipped the case without touching

1 anything near the trigger, and released the safety.
2 The gun fired and the bullet blew out the end of the
3 case, passed through both seats, went through the
4 passenger side door, coming out in three holes and
5 leaving five large indentations also on the outside of
6 the door. The largest pieces of bullet then punctured
7 in three places; the left rear tire of my hunting
8 buggy, which was parked next to the Blazer that have
9 forty-inch airplane tires and the sidewalls are
10 one-inch thick. The most frightening thing is that my
11 kids were asleep in the tent just on the other side of
12 the buggy, which is perfectly in line with where the
13 bullet passed.

14 That is the first time ever I had unloaded a gun
15 without pointing it toward the sky. Something is
16 definitely wrong with the trigger safety mechanism in
17 this gun, I suspect a problem such as you had with the
18 model 600 rifle.

19 Mr. Sanita said to include a list of damages with
20 the gun and you would inspect, repair or replace the
21 gun and reimburse me for the damages caused by this
22 incident. The seal has never been broken on the
23 trigger assembly. The only time that it has ever been
24 in the shop was to have a scope and recoil pad mounted.
25 I can never trust the gun again.

1 I have always used Remington products. I also have
2 two other model 700's, .243 caliber for my sons. I
3 also have two model 1100 shotguns and two model 870
4 pump shotguns. Now, I am worried about the 243's my
5 sons have. Do they have the same trigger safety
6 mechanism? They look the same from as much as I can
7 see. We will not use them again until I am sure they
8 are safe.

9 If you need to talk to me, my business telephone
10 number is (813) 299-6514 and my home number is (813)
11 299-4850. Please let me hear from you soon. Very
12 truly yours, Cal Reddick."

13 Q. Mr. Reddick, before you read the next letter, what do
14 you do for a living?

15 A. At the present time?

16 Q. Yes.

17 A. At the present time, I'm a businessman. I own an
18 electronic repair facility and I also own a video
19 store.

20 Q. Okay. Please continue. Read the Remington response,
21 if you would be so kind.

22 A. The letter is dated November 20th, 1981. "Dear Mr.
23 Reddick; With reference made to our recent telephone
24 conversation regarding your model 700, 30 aught 6
25 caliber rifle, serial number 3590929 that you returned

1 to us for examination, when it fired upon moving the
2 safety to the fire position, we found the gun to be in
3 perfect order. Again, we have installed a new trigger
4 assembly in the rifle and have made reimbursement to
5 you for the damage to your vehicle --" -- and they
6 stated the amount -- "Please allow from two to three
7 weeks for processing and delivery. We do regret any
8 inconvenience caused in this matter, Mr. Reddick, and
9 trust that our handling meets with your approval.
10 Sincerely yours --"

11 Q. And that's all they said?

12 A. Yes.

13 Q. They didn't say that it was their fault or anything of
14 that nature?

15 MR. CHAMBERLAIN: I will object to the form
16 of the question.

17 THE WITNESS: Not in this letter, no.

18 (BY MR. HUEGLI):

19 Q. How about over the phone or anything?

20 A. Yes, I had a telephone conversation when they called to
21 give me a report.

22 Q. What did they say and who did you talk to?

23 A. At that time, it was Mr. Stekl.

24 Q. What did Mr. Stekl tell you?

25 A. He told me they had inspected the gun and that the

1 trigger assembly had been gone into and that there was
2 red paint on the screws.

3 Q. Right.

4 A. And that the trigger pressure was -- I will have to
5 pick a number out of the air -- 3.5 is normal. It was
6 like 2.8.

7 Q. Okay.

8 A. It was lighter than normal.

9 Q. Yes.

10 A. However, they had been unable to duplicate the problem
11 with the gun, even with the lighter pressure. They had
12 test fired it many, many times and they had been unable
13 to duplicate it. And they felt that there was nothing
14 wrong with it.

15 I advised them during that phone conversation that
16 I certainly did not want the gun in its present
17 condition and that there had to be something wrong with
18 it. I think either changing the gun or exchanging the
19 gun, or some other satisfactory conclusion ----

20 Q. Okay.

21 A. And they suggested that they would change the trigger
22 guard assembly, if I would be satisfied with that, and
23 return the gun to me. I told them I would feel safe
24 with a new trigger guard assembly in the gun because I
25 know that is the mechanism that fires the gun, and I

1 felt that it would be safe with that mechanism changed.
2 Q. Okay. And then they sent you a check and paid for your
3 damages. How much were your damages?
4 A. I don't know if that's a figure I should disclose or
5 not. It was -- I really don't even -- well, I guess
6 not. Approximately \$400.
7 Q. And have you sent copies of those letters anywhere?
8 A. No.
9 Q. We are the first people to ask you about it then?
10 A. Yes.
11 Q. Has Remington recently contacted you in the last week
12 or so asking you to send copies?
13 A. No.
14 Q. Or has anybody else?
15 A. No, I have had no contacts with anyone except, I guess,
16 the lady attorney from your office, and you.
17 Q. Not from my office, probably from Mr. Chamberlain's.
18 A. Mr. Chamberlain's, correct. She was from -- I guess
19 she's the one. Well, I'm not sure. I'm not sure who's
20 who at this time.
21 Q. Was she from our office?
22 A. No.
23 MR. CHAMBERLAIN: Was it Kathy Janssen from
24 our office?
25 THE WITNESS: I forget who I was talking to.

1 (BY MR. HUEGLI):

2 Q. Well, you've been most helpful and I appreciate your
3 time this late at night for you.

4 A. It's not really that late for us here.

5 Q. I appreciate it. Thank you very much.

6 MR. HUEGLI: That's all the questions I have.

7 MR. CHAMBERLAIN: I've got a couple of
8 follow-up questions.

9 FURTHER EXAMINATION

10 (BY MR. CHAMBERLAIN):

11 Q. Have you talked to Mr. Huegli before this telephone
12 call?

13 A. I'm really not sure. Who is Mr. Huegli? .

14 MR. HUEGLI: That's me, the Remington lawyer.

15 THE WITNESS: No, I have never talked with
16 him.

17 (BY MR. CHAMBERLAIN):

18 Q. You are familiar with the term "hair trigger"?

19 A. Yes.

20 Q. Would you describe the pull on your Remington 700 that
21 you had, was it possible it had a hair trigger?

22 A. No, definitely not.

23 Q. It took more pressure than that to pull the trigger?

24 A. Yes. There was a fair amount of pressure required to
25 pull the trigger. I have some pistols with hair

1 triggers, and it's not the same pull.

2 Q. In the report that Mr. Huegli was referring to, it
3 indicated that Remington measured -- according to their
4 report -- measured the pull on your trigger at
5 two-and-a-half pounds, and their specification was 3.5.
6 Does that refresh your recollection?

7 A. Now, I'm not sure of the numbers. For example, the
8 average pull could have been 4.5 and they could have
9 told me that mine was adjusted to 3.5. I'm just not
10 sure of the numbers. As I recall, mine was adjusted
11 for probably sixty-five to seventy-five percent of what
12 they were requiring, as I understood the conversation.

13 Q. At least, that's what they told you, right?

14 A. Right.

15 Q. Okay. Now, do you own any other bolt action rifles?
16 Not Remingtons, but other brands?

17 A. Yes. I have a Western Field, which is a very old
18 rifle, .22 caliber. I own -- let's see. I'm not -- I
19 own a Marlin rifle. It's a .35 Remington caliber.

20 Q. That's a bolt action?

21 A. Pardon?

22 Q. That's a bolt action?

23 A. It's a lever action.

24 Q. Okay.

25 A. I guess you could refer to it as a lever action.

1 Q. Do either one of those rifles require you to take the
2 safety off to unload the gun?
3 A. You do on the .22 caliber, yes. You do on the old
4 Western Field, .22 caliber. Frankly, I'm not sure
5 about the .35 Marlin. I honestly hadn't had it that
6 long; I just bought it last year. I'm almost certain
7 that you have to, though I don't recall. I believe the
8 lever will come out without -- you know, I have it
9 here. I can find it.
10 Q. Do you have any other bolt action rifles?
11 A. No. I have some bolt action shotguns, but no other
12 rifles.
13 Q. And you think that those model 700's that you bought
14 for your boys, you purchased two or three years ago?
15 A. What did you ask me about those?
16 Q. Do you think that you purchased those two or three
17 years ago?
18 A. I probably would place it about three years ago, yes.
19 MR. CHAMBERLAIN: That's all the questions I
20 have. Jim, do you have anything to follow up with?
21 MR. HUEGLI: No, that's it.
22 MR. CHAMBERLAIN: You have the right, under
23 the Federal Rules of Civil Procedure, to read and make
24 any corrections that might be necessary to the
25 transcript of this deposition, or you can waive that

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right. We don't care what you do. If you want to read and make corrections and then sign it and send it back to us, that's all right, or if you would like, you can just waive that right.

THE WITNESS: I would like to have a copy of it. I don't know that I would want to amend it, but if it's okay, I would like to have a copy of it.

MR. CHAMBERLAIN: Do you want to waive your right and then we'll get you a copy of it after we get it transcribed?

THE WITNESS: Yes, that will be fine.

(Deposition concluded at 5:27 p.m.)

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STATE OF OREGON)
) ss
COUNTY OF MULTNOMAH)

I, the undersigned, Patricia Williams, a Notary Public for Oregon, do hereby certify that the telephone deposition of JAMES C. REDDICK was taken before me at the time and place mentioned in the caption of the foregoing deposition; that Mr. Peter R. Chamberlain appeared in behalf of the Plaintiffs Teri See and Darrel See and that Mr. James D. Huegli appeared in behalf of the Defendant Remington Arms Company, Inc., and the said witness being by me first duly sworn to testify the truth, the whole truth and nothing but the truth, in answer to oral interrogatories, testified as in the foregoing annexed deposition, Pages 1 to 25, both inclusive, set forth.

I further certify that all interrogatories propounded to said witness, together with the answers of said witness thereto, and all objections and other oral proceedings occurring upon the taking of said deposition, were then and there taken down by me in stenotype and thereafter reduced to typewriting under my direction, and that the foregoing annexed transcript, Pages 1 to 25, both inclusive, constitutes a full, true and accurate transcript of said deposition and proceedings, so taken by me in stenotype on said date, as aforesaid, and of the whole thereof.

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I further certify that I am not a relative or
employee or attorney or counsel for any of the parties,
or a relative or employee of such attorney or counsel,
or financially interested in said cause.

IN WITNESS THEREOF, I have hereunto set my
hand and notarial seal this 17th day of September, 1982.

Patricia Williams
Notary Public for Oregon
My commission expires: 6/9/84