

# REMINGTON ARMS COMPANY, INC.

INTER-DEPARTMENTAL CORRESPONDENCE




cc: Liberty Mutual (3)

bcc: J. A. Stekl  
Ilion

Bridgeport, Connecticut  
April 10, 1981

TO: R. B. SPERLING

FROM: J. H. CHISNALL 

RE: SEE VS. REMINGTON ARMS COMPANY, P604-8934 REG

Initial examination was made on the subject rifle in Baltimore, Maryland, 4/9/81 by J. Stekl and the writer with L. S. Martin present.

The Model 700 Varmint Special 6mm Remington caliber, Serial No. A6391951, was found to be in generally poor condition. Trigger assembly and bolt stop were full of solidified solvent, with the bolt stop inoperative (stuck in parallel position).

Trigger adjustment screws do not appear to have been adjusted, however, trigger assembly appears to have been removed some time previously as evidenced by reversed retaining pins.

The trigger pull was measured and found to be in excess of 72 ounces, well within specifications.

The safety was tested, and the rifle would not fire when the safety lever was moved to the "fire" position. The alleged incident could not be duplicated.

JHC:hss

S-P 0004

STANDARD CHARTER  
BANK

REGISTERED ENGINEER  
NUMBER 453K, PA.

RECEIVED

WILLIAM C. DAVIS, JR.  
13 Cone Street  
Wellsboro, Pa.  
16901

JAN 26 1983

R. B. SPERLING

TELEPHONE  
DIVISION

23 January 1983

James P. Hough, Esq.,  
Donna Williamson, Wyatt, Moore & Roberts  
1240 Stratford Plaza  
1700 S. 2nd Ave.  
Pottsville, PA 17854  
Re: See v. Remington

Dear Mr. Hough:

In accordance with our conversation and your letter of 1/19/83, I have prepared a copy of my report on the results of the physical examination conducted on 1/22/83. The report is being prepared in the form of a letter on a computer word processor and the report is done by the same method. I have not been able to do for domestic programs. It is hoped to be available to you in the near future.

I have received from Mr. Sperling a copy of the letter to you dated 1/19/83. I have also received a copy of the letter to you dated 1/22/83. I have no doubt that Mr. Hough, who prepared the letter, has done his work well. I will retain the letter for my own information, but do not consider it appropriate to detail it to you.

I have no further information to give you at this time. I have also received information from the book titled "The Court System" by Stuart G. Brown, published in 1970 by the American Bar Association, 200 East 42nd Street, New York, NY. I have not yet personally seen the book, but believe it is a good book for those employed by the American Bar Association and for those who are generally interested in the law. It is a book of reference and is considered a very good reference. I have also received information from the book titled "The Court System" by Stuart G. Brown, published in 1970 by the American Bar Association, 200 East 42nd Street, New York, NY. I have not yet personally seen the book, but believe it is a good book for those employed by the American Bar Association and for those who are generally interested in the law. It is a book of reference and is considered a very good reference. I have also received information from the book titled "The Court System" by Stuart G. Brown, published in 1970 by the American Bar Association, 200 East 42nd Street, New York, NY. I have not yet personally seen the book, but believe it is a good book for those employed by the American Bar Association and for those who are generally interested in the law. It is a book of reference and is considered a very good reference.

If I can be of further service to you in preparing your case, please do not hesitate to call. I will look forward to meeting you in Portland on February 2/83.

Sincerely,

W. C. Davis, Jr.  
W. C. Davis, Jr.

S-P 0109

CC: Bill Sperling

NOTES ON TESTING AT REMINGTON/ILION - 21-22 OCT 1982

RE: See v. Remington (M700 VS .243 Win. sn A6391951)

TEST PERSONNEL: J. Stekl, W. Warren, J. Linde, W. Davis

10/21/82: Gun had been placed in controlled-temperature box overnight at -20 degF by Remington personnel. I opened the box, found the gun inside, removed it from the cold-box, placed it in cradle resting horizontally, trigger-guard upward, simulating position lying across arms of chair. The gun was left undisturbed for 50 minutes at normal room temperature (approximately 70 degF). I attempted to lift the bolt, gun remaining in same position, as described by plaintiff. I found that somewhat awkward. I then disengaged the safety lever, re-engaged it, and attempted again to lift bolt handle, gun remaining in same position. I repeated this sequence for 100 trials. The gun remained cocked.

I placed the gun back into cold-box at approximately zero degF, bolt closed, safety engaged. Removed from cold-box after one hour, pulled trigger immediately. Noted trigger reset as intended by design. Attempted immediately to lift bolt handle, then disengaged and re-engaged safety. Repeated for 100 trials. The gun remained cocked.

10/22/82: Remington personnel placed gun outdoors, on roof of building, shaded from sun, at 7:30 AM. Ambient temperature was 37 degF. I resumed testing outdoors at 9:30 AM, temperature remained 37 degF. I found bolt closed, safety engaged. I pulled trigger, with safety engaged, noted trigger reset properly. I attempted to lift bolt handle, disengaged and re-engaged safety, repeated sequence for total 25 trials. The gun remained cocked.

Returned gun to laboratory indoors, allowed to return to normal indoor temperature of approximately 70 degF. Removed bolt, measured sear lift by engagement of safety, found it to be .006 inch. Noted when bolt stop was depressed and released, it rose steadily but very slowly, as if impeded by viscous resistance of congealed lubricant. Trigger and safety operation were normal, however. Noted trigger consistently reset correctly if pulled while safety was engaged. Tested trigger-pull force using spring scale, five

trials 4-1/2, 4-1/2, 4-5/8, 4-1/2, 4-1/2 pounds.

Repeated this sequence: With safety engaged, attempt to lift bolt, disengage safety, re-engage safety, repeat to 25 trials. Gun remained cocked.

Attempted to "trick" the safety, setting it at intermediate position, pulling trigger, then disengaging safety. Repeated for five trials. Gun remained cocked.

Removed stock. Noted gun was rebedded in epoxy-like compound. Found no interference of stock with fire-control parts. Noted guard screws had marred heads from prior work using poorly fitting screwdriver. Factory sealant on trigger adjustment screws appeared intact.

Stripped bolt, found interior parts lightly lubed, not notably dirty. Noted congealed oil around bolt stop and trigger assembly.

Noted sear/connector engagement appears normal, estimate approximately .020 to .025 inch. Checked trigger action by manually depressing sear, operation seems normal.

Removed rear pin holding trigger assembly, hinged assembly downward for further examination. Found it heavily fouled with sludge of congealed oil and solid particles. Sides of sear were coated with congealed oil, but nevertheless it appeared to function properly.

Photographs were taken by Remington photographer during principal test sequences.

Testing was concluded on 10/22/82.

WCD, Jr.

*Remington*



REMINGTON ARMS COMPANY, INC.

SPORTING ARMS-AMMUNITION-TARGETS-TRAPS

TELEX  
964-201  
STRATFORD, CT

BRIDGEPORT, CONNECTICUT NOTE OUR REVISED ADDRESS: TELEPHONE 203-333-1112

REMINGTON ARMS COMPANY INC.  
939 BARNUM AVE.  
P. O. BOX 1939  
BRIDGEPORT, CT 06601

October 6, 1982

VIA EMERY EXPRESS

James D. Huegli, Esq.  
Schwabe, Williamson, Wyatt,  
Moore & Roberts  
1200 Standard Plaza  
1100 S. W. 6th Avenue  
Portland, Oregon 97204

Re: See v.  
Remington Arms Company, Inc.

Dear Jim:

Enclosed are two copies of all the documented tests run on the Model 700, as requested by plaintiff's counsel.

Very truly yours,

REMINGTON ARMS COMPANY, INC.

*R. B. Sperling*  
Assoc.

R. B. Sperling  
Associate Counsel

RBS:hss

Enc.

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