

THE DISTRICT COURT OF THE NINTH JUDICIAL DISTRICT
OF THE STATE OF WYOMING IN AND FOR SUBLETTE COUNTY

Civil Action No. 2823

LARRY SLATTER,

Plaintiff,

vs.

REMINGTON ARMS MANUFACTURING
CO., and LENNIE LANE, d/b/a
LANE'S SPORTING GOODS,

Defendants.

REMINGTON ARMS MANUFACTURING COMPANY'S ANSWERS
TO PLAINTIFF'S INTERROGATORIES

Defendant Remington Arms Manufacturing Company
answers Plaintiff's Interrogatories as follows:

Q1. Identify by name and address the person
answering these interrogatories on behalf of Remington Arms
Manufacturing Company, and state his or her authority to
answer on behalf of said defendant.

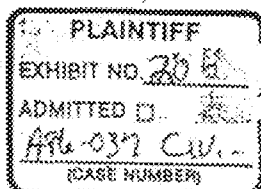
A1. Mr. Robert B. Sperling, Esq., Associate
Counsel, Remington Arms Company, Inc., 939 Barnum Avenue,
Bridgeport, Connecticut 06602.

Q2. The rifle in question is a Remington Model 700,
25-06 caliber, serial number 6853510. State whether or not
this rifle was manufactured by defendant, if so where and
when, and describe in detail who had possession thereof up
through the time defendant parted with possession and to whom
possession was delivered. If possession went through a
subsidiary company, trace possession until said subsidiary
company parted therewith.

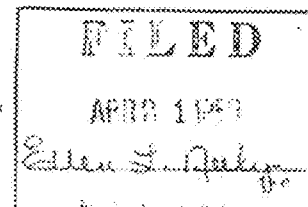
A2. Remington Arms Co., Inc. did manufacture the
rifle. Factory Order No. A32857. Invoice No. 63649. Sold
to Wyoming Wholesale, 464 North Kenwood, Casper, Wyoming.
Date shipped: 22 May 1975.

Q3. State whether or not said rifle was
manufactured for and intended for ultimate retail sale and if
so state whether or not any warranties, express or implied,
or disclaimer thereof accompanied said rifle and attach
copies of any such express warranties or disclaimer to your
answer.

A3. See attached copy of Owner's Manual.



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265 Reed Building
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Q4. State the period of time this model and caliber of rifle has been manufactured by defendant, the total dollar volume generated thereby and identify the volume and amount of such sales in the State of Wyoming. Attach a list of purchasers residing in Wyoming and their addresses.

A4. Remington has been manufacturing the Model 700 for a period of 10 years. There is no way to determine the dollar volume generated from the sale of the Model 700, 25-06 caliber, nor can we determine how many of the rifles were sold in the State of Wyoming. Remington sells to wholesalers who in turn sell to retailers. Wholesalers can sell to retailers wherever they are located.

Q5. State whether or not this model of rifle has been advertised in Wyoming by national publication or otherwise within the past two years, and if so identify when and in what manner, and attach copies of all said advertisements to your answer herein.

A5. Attached are copies of advertisements placed in National Sportsman Magazine during the past two years.

Q6. State whether or not defendant has ever received a complaint from any customer that a rifle manufactured by defendant discharged when a live round was chambered. If so supply the name and address of all such persons and if such complaint resulted in the filing of legal action against defendant, supply a copy of the complaint or other document which would identify the Court and cause thereof.

A6. See J. H. Chisnall's Memorandum dated 3 April 1980, attached hereto.

Q7. State in detail what, if any, steps defendant normally takes to protect against loosening of trigger assembly adjustment screws. In regard thereto, explain what tests are normally conducted, and if such tests were allegedly performed on this rifle, identify the person or persons performing such tests, or inspectors, by name, address and position with defendant, and supply copies of any documents evidencing such reports. If such documents are normally available but not for this particular rifle state why such documents are not available and supply a format of a report that normally would have been completed.

A7. Sealants are applied to all of the trigger adjustment screws following their adjustment at the factory. The trigger adjustment screws are placed in the trigger

assembly, adjusted and sealed by the trigger assembly assembler. The trigger assembly is placed into the rifle by the final assembler, who verifies the trigger adjustment screws. The stamp of the final assembler is placed on the rifle barrel.

Q8. Supply plaintiff with any correspondence or any inter office memoranda or any other documentation available from files of defendant relating to alleged defects in trigger assembly manufacture and describe in detail any steps that have been taken to remedy defects similar in nature to that complained of by plaintiff.

A8. There is no manufacturing defect in the Slatter gun. The gun is in its present dangerous condition (fires when jarred) because some time after the gun left the factory the trigger adjustment screws were loosened to reduce trigger pull to only one and one-quarter pounds. Remington seeks to guard against this type of alteration by sealing the screws and by stating in the Owner's Manual accompanying each gun that: "No adjustment of trigger by the owner is recommended. Trigger pull has been factory adjusted. Should any adjustments be necessary return rifle to factory, or see a Remington approved gunsmith."

Q9. Identify by name and address the person or persons that inspected plaintiff's rifle on behalf of defendant in October of 1979. Identify by name and address three other persons presently or previously employed by defendant that would have relevant knowledge of manufacturing and shipping procedures of rifles manufactured by defendant, particularly in regard to inspecting and testing thereof.

A9. The name and address of the person or persons that inspected Plaintiff's rifle on behalf of Defendant in October of 1979 are as follows: Mr. G. J. Hill, Remington Arms Co., Inc., Ilion, New York; Mr. P. G. Johnson, Remington Arms Co., Inc., Ilion, New York; Mr. R. F. Balaska, Remington Arms Co., Inc., Ilion, New York; Mr. J. A. Steel, Remington Arms Co., Inc., Ilion, New York; Mr. J. W. Brooks, Remington

Arms Co., Inc., Ilion, New York; and Mr. W. A. Warren, Remington Arms Co., Inc., Ilion, New York. Those other persons presently or previously employed by Defendant that would have relevant knowledge of manufacturing and shipping procedures of rifles manufactured by Defendant, particularly in regard to inspecting and testing thereof include the following: Mr. J. J. Burns, Remington Arms Co., Inc., Ilion, New York; Mr. J. R. Snedecker, Remington Arms Co., Inc., Ilion, New York; and Mr. J. P. Linda, Remington Arms Co., Inc., Ilion, New York.

Q10. Identify the place where defendant's records and documents relating to customer complaints are located and identify by name, a person at such place having custody thereof.

A10. Mr. J. M. Chishall, Supervisor of Product Services, 938 Barnum Avenue, Bridgeport, Connecticut 06602.

STATE OF CONNECTICUT)
COUNTY OF Fairfield) ss

The foregoing instrument was acknowledged before me by C. B. Swearing this 15th day of April 1980. Witness my hand and official seal. My commission expires: _____

S E A L

William J. Swearing
Notary Public

NOTARY PUBLIC

My Commission Expires March 31, 1983

CERTIFICATE OF SERVICE

I certify that the foregoing Remington Arms Manufacturing Company's Answers To Plaintiff's

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Interrogatories was served upon all parties to this action pursuant to the Wyoming Rules of Civil Procedure on 18 April 1980 and that copies were mailed to: Gerald Mason, Esq.

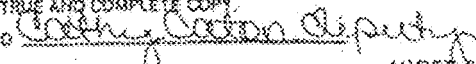

OF HIRST & APPELATE
Attorneys for Defendant
Remington Arms Manufacturing
Company
200 Boyd Building
Cheyenne, Wyoming 82001

THE STATE OF WYOMING

COUNTY OF SUBLETTE

I, DIANE E. NEAL SMITHLING, CLERK OF THE
NINTH JUDICIAL DISTRICT COURT WITHIN AND
FOR SAID COUNTY AND IN THE STATE AFORESAID
DO HEREBY CERTIFY THE FOREGOING TO BE
FULL, TRUE AND COMPLETE COPY.

SIGNED


Diane E. Neal Smithling, Clerk

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