

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

TERI SEE and DARREL SEE,

No. 3:13-cv-01765-BR

Petitioners ,

vs.

**REMINGTON ARMS COMPANY,
LLC.,** A Delaware Limited Liability
Company, and **SPORTING GOODS
PROPERTIES, INC.,** A Delaware
Corporation

**PETITION FOR RELIEF FROM
JUDGMENT TO REMEDY FRAUD ON
THE COURT**

Defendants.

**EXHIBIT 2
SEE FIRST REQUEST FOR PRODUCTIONS**

E. Richard Bodyfelt
 Peter R. Chamberlain
 BODYFELT, MOUNT & STROUP
 229 Mohawk Building
 222 S.W. Morrison
 Portland, OR 97204
 Telephone: (503) 243-1022

Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON

TERI SEE and DARREL SEE,)	
wife and husband,)	
)	
Plaintiffs,)	Civil No.
)	
v.)	
)	
REMINGTON ARMS COMPANY, INC.,)	REQUEST FOR PRODUCTION
a Delaware corporation,)	
)	
Defendant.)	

Pursuant to FRCP 34, plaintiffs request that defendant produce for inspection and copying, within 45 days from the date of service of this Request, the documents set forth below. As used in this Request, the word "document" shall be given its broadest possible meaning and shall include, but not be limited to, all forms of documents set forth in FRCP 34(a). Production shall be at the offices of Bodyfelt, Mount & Stroup, 222 S.W. Morrison, Room 229, Portland, Oregon, 97204.

DOCUMENTS

1. Exemplars of all product literature provided or intended for provision to purchasers of the Remington Model 700 rifle for

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Exhibit "A"

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 Attorneys at Law
 229 Mohawk Building
 Portland, Oregon 97204

*rec'd first nice manuals but nothing else
 this may be all*

D/L
10/79

1 the five-year period preceding October 27, 1979.

2 *2-1* *Rec'd field service manuals*
3 All service manuals produced and used or intended for use
4 by defendant in the repair, replacement or servicing of the Rem-
5 ington Model 700 rifle for the five-year period preceding Oct-
6 ober 27, 1979.

7 *3.* All design and manufacturing drawings and specifications
8 relating to any and all safety mechanisms used, intended for use
9 (whether used or not), proposed for use (whether used or not), or
10 deleted from use on defendant's Model 700 rifle.

11 *4.* All design and manufacturing drawings and specifications
12 relating to any and all trigger mechanisms used, intended for use
13 (whether used or not), proposed for use (whether used or not), or
14 deleted from use on defendant's Model 700 rifle.

15 *✓* *5.* All product complaints, claims, notices, lawsuits, letters,
16 memoranda or other information received, or generated, by defendant
17 that claim, indicate, suggest or conclude that defendant's Model 700
18 rifle discharged when the safety was being disengaged.

19 *✓* *6.* All documents which relate in any way to any recall cam-
20 paigns for defendant's Model 700 rifle.

21 *7.* All documents which relate in any way to any recall cam-
22 paigns for defendant's Model 600 rifle.

23 *8.* All documents relating to all tests performed by defendant
24 on its Model 700 rifle. — *index* *+ all tests done on the 49 similar failures*

25 *9.* All documents relating to all tests performed by defendant
26 on its Model 600 rifle.

10. All primary and excess insurance policies which do or may

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only info provided re the 600
are drawings
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1 provide coverage for all or part of plaintiffs' claims.

2 (11.) All memoranda, correspondence, reports, letters or
3 other documents generated as part of defendant's design, manu-
4 facture, testing and/or modification of the safety mechanisms
5 on defendant's Model 600 rifle.

6 (12.) All memoranda, correspondence, reports, letters or
7 other documents generated as part of defendant's design, manu-
8 facture, testing and/or modification of the trigger mechanisms
9 on defendant's Model 600 rifle.

10 (13.) All manufacturing, trade and governmental standards,
11 codes or regulations with which defendant complied or attempted
12 to comply, whether suggested, voluntary or mandatory in the design,
13 manufacture and sale of the Remington Model 600 rifle.

14 DATED this 18th day of September, 1981.

15 BODYFELT, MOUNT & STROUP

16
17 By _____
18 Peter R. Chamberlain, of
19 Counsel for Plaintiffs
20
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22
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