

**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 23
1980-81 MEMO**

OPERATIONS COMMITTEE
ELION DIVISION

JULY 17, 1980

MINUTE #14

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"Chart XXXVI shows Category I projects, intended to put us in a more secure position with respect to product liability:

1. The Model 700 bolt lock has been redesigned to operate independently of the safety and to allow the shooter to reload his gun with the safety in the "ON" position. Production costs are being developed by Industrial Engineering and the final version is now in test.
2. Three different designs of the M700 Fire Control are being considered. Two are ready for release to the Test Lab and one is still on the drawing board. Upon successful completion of the Model 700, work will continue to develop similar mechanisms for all of our bolt action rifles.

FIREARMS RESEARCH DIVISION
C A T E G O R Y I
NECESSITY

	<u>Eng.</u> <u>Manpower</u>	<u>Budget</u> <u>1980</u>	<u>Eng.</u> <u>Manpower</u>	<u>Budget</u> <u>1981</u>
M700 Bolt Lock	.7	115M	.5	75M
M700 Fire Control	1.2	120M	1.5	200M
M788 Safety	.3	20M	.5	60M
	2.2	255M	2.5	335M

Chart XXXVI

PLAINTIFF'S
EXHIBIT

FINANCIAL REPORTING DIVISION							
FINANCIAL REPORTING							
1980 - 1981							
	1980		1981				
	Assigned New Year	Estimated Expenditures	Assigned New Year	Estimated Expenditures		Estimated Completion	
NECESSITY				Crif. Paid.			
IT WORK STATE IMPROVEMENT	.7	\$ 135M	.6	\$ 75M	Necessary to reduce product liability.	End of year	August 1980 Nov. 1980 Following in 1981.
IT STATE CRASHES IMPROVEMENT	3.2	\$ 27M	1.9	3.6	200M	Necessary to reduce product liability.	Three prototypes June 1980 Nov. 1981
WORKS FOR SAFETY	.3	30M	.3	.5	40M	Necessary to reduce product liability.	Six prototypes June 1980 Nov. 1980 Design follow-up in 1981
Sub Total	2.2	\$ 275M	3.5	\$ 150M			
COMMITMENTS							
RESEARCH AND DEVELOPMENT	2.8	200M + 2700M	1.8	.7	\$ 150M	\$1.7M increased 3 year earnings 28% R.O.I.	Dec. 1980. Design follow-up upward addition of new engineers Nov. 1981
SALES AND PROMOTION	5.8	70M	2.8	5.5	\$ 70M	Sales earnings 70M	Four prototypes Sept. 1980 Design work followed last year completion Nov. 1980 October Nov. 1981
NEW TOOL DEVELOPMENT CUSTOMER SERVICE	3.2	91M	.8	.5	\$ 80M	Required to support sales of R group examination	August 1980 Design follow-up in progress. December 1980 - 1981
RESEARCH AND DEVELOPMENT TOTAL COST	3.2	260M + 82M	.8	8	\$ 60M	Increased earnings 30.25M earnings for 3 years	December 1980 1981 for design follow-up progress
NEW ACTION FASHION REVISION	1.9	125M	1.0	8 7.8	\$ 85M	Increased sales earnings	December 1981