

**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 27  
ALEKSICH – SUPPLEMENTAL EXHIBIT LIST**

Mr. John W. Whelan and  
Mr. William P. Joyce  
BURGESS, JOYCE & WHELAN  
2801 South Montana Street  
Butte, MT 59701  
Telephone: 406-782-0484

Mr. William H. McDonald  
Mr. Richard C. Miller  
WOOLSEY, FISHER, WHITEAKER & McDONALD  
Post Office Box 1245  
Springfield, MO 65801  
Telephone: 417-869-0581

ATTORNEYS FOR PLAINTIFFS

FILED 363  
MAR 17 1995  
CLERK  
ST. Marylyn Bersack  
FBI - BUTTE

IN THE UNITED STATES DISTRICT COURT

MAR 17 1995

FOR THE DISTRICT OF MONTANA

BUTTE DIVISION

U. S. District Court  
District of Montana

LOUIS ALEKSICH, RAINELLE ALEKSICH,  
and LOUIS ALEKSICH, guardian ad litem  
for BRENT ALEKSICH, a minor

Plaintiffs,

vs.

REMINGTON ARMS COMPANY, INC.,  
and  
E. I. DuPONT DE NEMOURS AND COMPANY,

Defendants.

Cause No. CV-91-5-BU-PGH

SUPPLEMENTAL EXHIBIT LIST

\* Additional documents will be added to this list as they are produced by  
Defendant(s) or otherwise obtained.

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3000	Advice of Action re: Use of duPont oval trademark by Remington dated March 14, 1934	AL0013517		
3001	Advice of Action re: Use of duPont oval trademark by Peters Cartridge Company dated January 10, 1935	AL0013518		
3002	Advice of Action re: Use of duPont oval trademark by Remington Arms of Canada, Ltd. dated October 29, 1958	AL0013519		
3003	Memo to Board of Directors of Remington Arms Company from the President re: Use of duPont oval by Remington Arms Company dated May 3, 1968	AL0013522-23		
3004	Agreement between duPont and Remington regarding the duPont oval dated May 13, 1968	AL0013524-30		
3005	Letter to E.L. Grimm, Legal Department of duPont from J.H. Lewis dated August 22, 1973 re: duPont/Remington Agreement of May 13, 1968 re: Use of duPont Oval Trademark with attached drawings	AL0013531-38		
3006	Letter to John H. Lewis from E.L. Grimm re: use of duPont oval dated October 17, 1973	AL0013539		
3007	<u>How to Use the duPont Oval</u> dated January 20, 1983	AL001354-55		
3008	Memo to D.B. Mahoney from R.A. Partnoy dated September 24, 1981 re: Remington use of duPont oval with attached documents	AL0013540-53		
3009	Announcement re: New Corporate Logo from J.G. Williams Letter to February 1, 1983	AL0013556		
3010	<u>Corporate Identity</u> , a manual for the standard use of the company name, trademark and slogan	AL0013558-618		
3011	Lease Between Sporting Goods Properties, Inc., and E.I. duPont de Nemours and Company dated December 1, 1993	AL0013619-24		
3012	Sporting Goods Properties, Inc. Balance Sheet as of December 31, 1994	AL0013625-30		
3013	Organization Notice from C. T. Wagner dated July 27, 1974	AL0014173		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3014	Statement to Employees - Finance Dept. Consolidation from C. T. Wagner	AL0014175		
3015	Handwritten notes entitled M/600 and M/700 Trigger Assembly Improvements dated June 12, 1979	AL0014709-13		
3016	Memo to J. A. Stekl from E. G. Larson dated April 6, 1979 with attachment of handwritten notes by Bill Warren re: Returned M/600 Trigger Assemblies	AL0014714-16		
3017	Memo to Hall, Sanita and Stekl from E. G. Larson dated April 12, 1979 re: Returned Gun Procedure Memo of March 16, 1979	AL0014719-20		
3018	Handwritten memo to J. G. Hill from J. P. Linde dated March 12, 1979 re: M/600 and XP-100	AL0014723-24		
3019	Handwritten notes regarding problems with trigger assemblies	AL0014728-29		
3020	Memo to J.P. Linde from R.L. Hall re: Documents to be sent to H.K. Boyle dated December 12, 1978	AL0014745-46		
3021	Hand drawn graph of Rifles and Malfunctions	AL0014758		
3022	Memo from J.j.Burns from J. P. Linde dated November 29, 1978 re: Review of M/700 rifles returned to Arms Service	AL0014759		
3023	Memo to Workman, Walker, Linde, Albaugh, Forson from B.F. Barrett dated November 16, 1978 re: Bolt Action Fire Control--Design Review November 14, 1978	AL0014774-75		
3024	Handwritten note from Jerry Burns to J.P. Linde dated November 13, 1978 re: Trick Tests	AL0014777		
3025	Memo to J.P. McAndrews and E.F. Barrett from R. B. Sperling dated February 7, 1980 re: Status of M/700 Plant Audit	AL0014947		
3026	Memo to C. B. Workman from W. L. Ericson dated February 8, 1982 re: Patent Review Meeting of January 28, 1982	AL0015562-63		
3027	Document Entitled Firearms Research dated July 1984	AL0016119-20		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3028	Document Entitled M/7 Design Specification from F.E. Martin September 11, 1981	AL0016246-47		
3029	Folder of document entitled Belt Action Fire Controls	AL0016386-465		
3030	Memos re: M/700 Rifle that Misfired Because of Gummed Triggers dated October 1980	AL0017502-506		
3031	Trigger Assembly Special Replacement Program Sheet from Robert Cole dated September 23, 1982	AL0017508		
3032	Memo to C.B. Workman from W.H. Forson, Jr. dated April 30, 1981 re: Model Requirements-- M/700 Restyle	AL0017551		
3033	Memo to S.D. Bennett from A.E. Desmond dated June 18, 1981 re: M/700 Trigger Assembly--Present versus New Proposed Assembly	AL0017610		
3034	Memo to Bill Ericson from Kevin Cornell dated October 27, 1993 re: Recent Repair Survey	AL0017826		
3035	Letter from E. C. Gilbrith to Jim Sticles dated March 22, 1991 with attached affidavit of Robert J. Bauman and Engineering Report from Tom Butters	AL0017827-51		
3036	Handwritten data sheets regarding the 2' Pendulum Drop Test Report No. 840321 dated February 1984	AL0018471-87		
3037	Memo to J.H. Hennings from F.L. Supry re: Report No. 820331 entitled Evaluation of Lubricants on Firearm M/700 Cock and Fire Simulation dated April 1982 (with attached supplements)	AL0018672-716		
3038	Research Test and Measurement Report No. 830941 prepared by R. Howe on April 6, 1983	AL0020199-15		
3039	Remington DuPont Report "Experiences in the Design & Manufacture of Shotguns & Rifles" dated October 1945	AL0020729-59		
3040	Correspondence concerning relationship between Remington and The Connecticut Spring & Stamping Corporation dated October 1988	AL0021176-84		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3041	Memo to H.K. Boyle from F.T. Millner dated February 11, 1982 re: Service Requirement for M/700 Relative to Removal of Bolt Lock	AL0021431-32		
3042	Documents re: Assembly & Inspection Procedure--Mohawk 600 Trigger Assembly	AL0021786-95		
3043	Memo to C.B. Workman from J.W. Brooks dated September 12, 1978 re: Bob Nagle's Article on Hunting Rifle Safeties from March 78 <u>Rifle</u> magazine	AL0021838		
3044	Letter to Clem Morgello from R.A. Partnoy dated February 13, 1979 re: <u>Dunn's Review</u> Article on Product Recall	AL0021874		
3045	Letter from R.A. Partnoy to <u>Dunn's Review</u> dated January 15, 1979 re: January 1979 issue of <u>Dunn's Review</u>	AL0021875		
3046	Document from J. S. Martin dated December 3, 1969 re: New Center Fire Rifle	AL0022385		
3047	Memo to H.A. Brown from H.J. Haskin dated November 21, 1952 re: his inquiry of the M/721 complaint reports	AL0022407-09		
3048	Research presentation dated July 9-11, 1975	AL0022437-46		
3049	Listing and comparisons of justified complaints for October 1948	AL0022477-84		
3050	Listing and comparisons of justified complaints for September 1948	AL0022485-91		
3051	Memo to E. G. Larson from G. W. Martin dated March 26, 1975 regarding Mohawk 600 at Carter's in Houston, TX	AL0022637-38		
3052	Minutes of the product safety subcommittee held April 2, 1975, regarding M/600	AL0022649-50		
3053	Customer Complaint of John Ralston dated April 1, 1975	AL0022672-84		
3054	Memo to C. S. McCawley from R. A. Baldwin dated October 23, 1978 re M/660 recall ad	AL0022686		
3055	Memo to E. F. Sienkiewicz from E. G. Larson dated November 3, 1978 re briefing of personnel visiting gunsmiths	AL0022689		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3056	Memo to field service reps visiting TX from E. G. Larson dated October 30, 1978 re gun recall	AL0022690		
3057	Memo to McAndrews, William, Hooton and Partnoy from E. F. Barrett dated October 30, 1978 re: M/600 Recall-Status Report	AL0022707-09		
3058	Memo to E. G. Larson from J. A. Stekl dated February 4, 1980 re: M/600 Complaints Involving P.I. and/or Property Damage	AL0022714		
3059	Memo to J. Stekl from D. J. Sanita dated January 17, 1980 attaching GER #186 and customer complaint of Simms Hardware	AL0022715-18		
3060	Customer Complaint and GER #185 from Snappy ServiSenter dated November 29, 1979	AL0022719-22		
3061	Letter to R. L. St. John from Les Freer Gunsmith dated July 12, 1979	AL0022736-37		
3062	Typewritten draft of letter to the editor regarding M/600 recall	AL0022747		
3063	Letter to firearms distributors from E. J. Conroy regarding rifle recall dated February 8, 1979	AL0022748-50		
3064	Customer Complaint from Charles Murray dated November 13, 1978	AL0022760-63		
3065	Memo from S. M. Alvis to G. M. Calhoun dated May 19, 1964 re: Gun Safety--Special "Jar Off" Tests for Model 700 and 600	AL0022785		
3066	M/700 Customer Guns Returned by Complaint--Month Received and Yearly Total for 1962 and 1963	AL0022787-805		
3067	Listing and comparisons of justified complaints for August 1948	AL0022792-96		
3068	Letter to W. E. Leek from S. M. Alvis dated April 19, 1968 re: M/700 BDL Quality--Computer Aided Design	AL0022806-07		
3069	Memo to G. M. Calhoun from P. H. Burdette dated April 17, 1968 re: M/700 BDL Quality	AL0022808		
3070	Memo to R. A. Williamson from L. Fox dated March 21, 1968 re: Consumer's Union--M/700 BDL Varmint Special, Calibre 22-250	AL0022811		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3071	Memo to J. G. Williams from E. G. Larson re: Visit Report--Consumer's Union--Model 700 BDL 22-250 dated March 11, 1968	AL0022812-13		
3072	Article entitled Varmint Rifles from March 1978 issue of <u>Consumer Reports</u>	AL0022816-9		
3073	Document entitled M700 June 14, 1974 from the Custom Firearms Development	AL0022822		
3074	Memo to F. E. Morgan from E. G. Larson dated April 9, 1973, re: Bolt Gun Safeties	AL0022827		
3075	Memo to S. M. Alvis from F. G. Hart dated February 21, 1973 re: Model 700 Gun Owner's Guides	AL0022828		
3076	Memo to R. P. Kelly from S. M. Alvis dated February 21, 1973 re: M/700 Instruction Folder	AL0022829		
3077	Memo to G. M. Calhoun and S. M. Alvis from W. E. Leek dated April 24, 1968 with attached report entitled New Development Automatic, Pump and Lever Center Fire Rifles	AL0022858-72		
3078	Memo to H. A. Brown from M. H. Walker dated August 16, 1948 re: M/721 Modification of Safety Design	AL0022932-33		
3079	Packet of 1978 customer complaint information, including handwritten notes and copies of blank hold harmless and indemnity agreements	AL0023149-92		
3080	Memo from W. E. Leek to G. H. Pickney dated September 17, 1947 re: M/721 Performance at Extreme Low Temperature Conditions	AL0023221		
3081	Memo to W. E. Leek from G. H. Pickney dated August 29, 1947 re: M/721 Performance at Extreme Low Temperature Conditions	AL0023222		
3082	Memo from W. E. Leek to G. H. Pickney dated August 26, 1947 re: M/721 Performance at Extreme Low Temperature Conditions	AL0023234-35		
3083	Daily Progress Report from W. E. Leek re: M/721 Pilot Line Inspection dated April 9, 1947	AL0023239		
3084	Memo to J. S. Martin from R. C. Ecker dated January 15, 1970 (re: Trigger Creep)	AL0023332-35		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3085	Memo to W. E. Leek from C. B. Workman dated July 7, 1970 re: Statistical Method of Evaluating Firearms Design and Manufacture	AL0023383		
3086	Memo to J. P. Linde from D. E. Bullis dated December 1, 1975 re: Progress Report	AL0023392-93		
3087	Memo to A. D. Kerr and C. B. Workman from G. J. Hill dated January 6, 1976 re: Center Fire--Fire Control--Safety Problems, Center Fire--Design Process Problems	AL0023414-16		
3088	Memo to J. P. Linde from F. E. Martin dated March 25, 1976 re: M/700 Serial No. 623088 Caliber 243 Winchester Customer Complaint P.S.R.	AL0023418-19		
3089	Memo to J. P. Linde from F. E. Martin dated March 4, 1976 re: M/700 25.06 Serial No. 6486814 Customer Complaint	AL0023422-24		
3090	Memo to J. P. Linde from F. E. Martin dated March 3, 1976 re: M/700 L.H. 30.06 Serial No. 6858856 Customer Complaint	AL0023425-27		
3091	Memo to J. P. Linde from F. E. Martin dated January 14, 1976 re: Monthly Progress Report	AL0023428-29		
3092	Memo to J. P. Linde from Martin dated September 2, 1975 re: Monthly Progress Report	AL0023438-39		
3093	Memo to J. P. Linde from martin dated June 16, 1975 re: M/600 Fire Control	AL0023440		
3094	Memo from M.H. Walker to Barrett Workman, Lindy Albaugh and Forson dated November 20, 1978 re: Bolt Action Fire Control--Design Review November 14, 1978	AL0023503		
3095	Document marked M600 Fire Control	AL0023528-30		
3096	Memo from J.P. Lindy to W.E. Leek dated March 4, 1977 re: Mohawk 600 Rifles for Export to Australia	AL0023534-35		
3097	Letter to J. W. Boettner from G. Willick dated February 9, 1973 re: Model 700 Trigger Safety	AL0023540-41		
3098	Letter to Remington Arms Company from D. Tietjen dated March 22, 1973 re: Prohibitive Firearms Imports Models 700 and 541S	AL0023542		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3099	Memo to S. M. Alvis from F.E. Morgan dated February 22, 1973 re: Letter From Boustad Wood Pty. Ltd.	AL0023545		
3100	Memo to J.H. Chisnall from J.P. Lindy dated September 21, 1977 re: Letter From C.V. Thompkins, attached letter	AL0023559-60		
3101	Research Presentation for July 11, 1977	AL0023565-75		
3102	Memo to C.B. Workman from J.P. Lindy dated June 20, 1977 re: Memo of Visit with C.V. Thompkins	AL0023578-80		
3103	M/700 Safety Evaluation Serial No. 633870 25.06 E. Sliwa dated May 20, 1977	AL0023586		
3104	M/700 Safety Evaluation Serial No. 6859218 70 Win. J. Schiro dated May 20, 1977	AL0023587		
3105	M/700 Safety Evaluation Serial No. 6718369 30.06 E. Sliwa dated May 20, 1977	AL0023588		
3106	5-Year Development Projection Manual Firearms Design Group dated May 17, 1977	AL0023590		
3107	Memo to C.B. Workman from J.P. Lindy dated May 2, 1977 M/700 Fire Control Returned by Field Service Representatives	AL0023594-96		
3108	Notes for Operations Committee - Mohawk 600, Model 700 Fire Control Review dated April 25, 1977	AL0023597-99		
3109	Fire Control Design Considerations--Bolt Action Rifles dated January 19, 1977	AL0023605-06		
3110	Letter to Harry Creighton from J.A. Stekl dated January 22, 1975 re: M/700 Misfire	AL0023608-09		
3111	Memo to E.F. Barrett from J.P. Linde dated May 4, 1976 re: Release Trigger on Repair Guns	AL0023644		
3112	Letter to C.V. Thompkins from J.P. Linde dated September 29, 1976	AL0023653		
3113	Memo to J.P. Linde from F.E. Martin dated October 18, 1976 re: Progress Report July through September	AL0023654-55		
3114	Memo to W.A. Best from S.M. Alvis dated January 9, 1953 re: M/721 Quality and Endurance Testing	AL0023676		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3115	Handwritten notes and graphs re: M/721 Endurance Test 1952	AL0023677-701		
3116	Memo of Discussion S.M. Alvis dated March 24, 1954 re: M/721-722 Quality	AL0023714-16		
3117	Memo to H.J. Hackman from Quality Control Department (W.S. Bryant) dated May 18, 1954 M/721-22 Trigger Pull	AL0023720		
3118	Memo to C.B. Workman from J.P. Linde dated May 2, 1977 re: M/700 Fire Control Returned by Field Service Reps	AL0023757-59		
3119	Fire Control Alterations - Mohawk 600 dated April 19, 1977	AL0023763		
3120	<u>Gun Testing Manual</u>	AL0023826-88		
3121	NBAR Fire Control Design Objectives	AL0023959		
3122	Handwritten comparisons dated October 15, 1993 regarding the point of view regarding customer, marketing, manufacturing, liability, engineering processing, engineering design	AL0023960-65		
3123	Handwritten comparisons dated October 15, 1993 regarding the point of view regarding customer, marketing, manufacturing, liability, engineering processing, engineering design with additional handwritten notes	AL0023977-83		
3124	NBAR Fire Control Design Objectives with handwritten notes by Bill W. dated October 22, 1993	AL0023984		
3125	Document regarding project title: Center Fire Rifle System Research dated January 1982	AL0024003-04		
3126	Document regarding project title: Bolt Action Rifle Development Program dated January 1982	AL0024005-06		
3127	Gunsmith Call Report from Sportswest-Div. of Pay'n Save Corp. dated September 24, 1982	AL0024034		
3128	Memo to J.P. Linde from C.J. Miller and R.E. Nightengale dated September 27, 1977 re: 17 REM Primer Blanking	AL0024072-073		
3129	Memo to E.G. Larson from E.F. Sienkiewicz dated July 21, 1977 re: Model 700, .17 Caliber Rifles	AL0024076		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3130	M/700 Problem	AL0024467		
31311	Memo to D.J. Sanita from E.G. Larson dated January 23, 1980 re: M/600 recall	AL0024608		
3132	Memo to E.G. Larson from E.F. Sienkiewicz dated February 22, 1979 re: Rifles Returned for Fire on Safe Release	AL0024651		
3133	Customer Complaint of Susan McGinnis dated January 18, 1979, GER #65	AL0024694-99		
3134	Letter from E.F. Sienkiewicz to O.K. Baxley re: Customer Complaint for M/700 Rifle, Serial No. 307270 dated December 11, 1978	AL0024700		
3135	Memo to P.H. Holmberg from R.L. Sassone, dated May 2, 1980,, re New Format Instruction Book	AL0025065		
3136	Memo to Druane Ricci from Ronald Crass, dated February 3, 1983 re: Rejected trigger connector	AL0025181		
3137	Handwritten note to John - M/700 Sear Safety Cam	AL0025778		
3138	Memo from T.W. Rawson dated October 19, 1981 re Summary Executive Bolt Action Rifle Competitive Audit	AL0025561-65		
3139	Memo from J.W. Brooks dated April 9, 1981 re: trigger Assembly Parts	AL0025676-77		
3140	Memo to Clark Workman from Wayne E. Leek January 25, 1982.	AL0026166-91		
3141	Letter to Rogers S. White from Wayne E. Leek dated January 24, 1982	AL0026195-96		
3142	Model XP-100 testing results dated December 14, 1962	AL0027816-25		
3143	Research test and measurement report no. 812441 dated September 10, 1982	AL0027889-99		
3144	Memo to T. L. Capeletti from T. W. Rawson dated April 16, 1982	AL0027925-27		
3145	Handwritten notes entitled, Bolt Action Program dated January 5, 1982	AL0027940-41		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3146	Document from F. E. Martin entitled Bolt Action Program - 1984 Introduction, Fire Control Revision and Redesign, December 21, 1981	AL0027947		
3147	Memo to C. B. Workman from T. L. Capeletti dated March 2, 1981 regarding potential improvements to Bolt Action Rifles	AL00280164-65		
3148	Memo to J. P. Glass from T. L. Capeletti dated December 11, 1980 regarding potential improvements to Bolt Action Rifles	AL0028067-68		
3149	Hand drawn graph entitled Current Remington Bolt Action Fire Controls	AL0028132		
3150	Procedure for replacement of trigger housing assembly on Model Seven Lightweight	AL0028287-90		
3151	Document from J. P. Linde Model XP 100 sequence of events dated January 26, 1979	AL0028613-615		
3152	Document from C. P. Workman from B. K. Daubenspek dated February 8, 1979 entitled XP-100 changes to sear	AL0028619		
3153	Document from J. H. Chambers to T. W. Rawson and R. E. Schrader dated January 27, 1983, Customer Clues to Quality--Bolt Action Center Fire Rifles--Final Report	AL0028671-72		
3154	Document from C. A. Riley to P. H. Holmberg, June 1, 1982, entitled New Bolt Action Rifle	AL0028726-30		
3155	Letter to Clark Workman from Merle Walker March 12, 1982,	AL0028744-45		
3156	Memo to A. A. Hugick from C. J. Sweet dated January 5, 1979--M700 Classic Pilot Line Field Cycle Test (243 Calibre)	AL0028926		
3157	Research test and measurement report dated 820331 prepared by Fred Supry on March 22, 1982	AL0029379-401		
3158	Memo to J. P. Linde from G. J. Hill dated March 5, 1982 M-700 Bolt Lock Change, Bolt Will Open With Safe On	AL0029404		
3159	Letter from Nick Harvey, Sporting Shooter Magazine to Clark Workman dated April 20, 1982	AL0029409-10		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3160	Memo to C. B. Workman from J. W. Brooks dated August 19, 1981, regarding M-700 Cleaning and Lubrication	AL0029472		
3161	Memo to C. B. Workman from T. L. Capeletti dated April 28, 1981, regarding M-700 features for possible use in advertising	AL0029490		
3162	Document from R.L.S., M-700 Field Service Gunsmith Bulletin	AL00295203-05		
3163	Rules for recording experiments	AL0029556		
3164	Booklet of Experiments by F. E. Martin dated beginning April 8, 1980 to January 13, 1982, containing handwritten notes and photos	AL0029557-90		
3165	Index of research notebooks dated August 19, 1980	AL0029592		
3166	Research department procedure technical notebooks dated April 30, 1981	AL0029594-98		
3167	Research department procedure technical bound notebooks dated October 11, 1968	AL0029599-602		
3168	Remington Research Booklet with handwritten notes and drawings for years 1943-44	AL0029603-688		
3169	Receiving and estimating report from Peoria Police Department dated September 3, 1976	AL0029689-91		
3170	Handwritten notes from J. W. Bower to Harvey Boyle dated December 29, 1975	AL0029692		
3171	Memo from J. W. Bower to C. B. Workman dated March 10, 1975 re: M/700 600 Fire Control Malfunctions	AL0029693		
3172	Letter to George Martin from Les Freer dated January 28, 1975 regarding trigger malfunctions	AL0029694		
3173	Letter to George Martin from Raymond Osbon dated January 29, 1975 regarding M/600 trigger malfunction	AL0029695		
3174	Memo from J. W. Bower to E. R. Carr dated March 18, 1975, Progress Report--M/600-700 Fire Control System	AL0029703		
3175	Memo from E. R. Carr to Fred Milleuer dated December 21, 1973, M/700--Customer Complaints: Fires on Safe--Follows Down	AL0029705		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3176	GER from Fulks Sporting Goods, Inc. dated February 1, 1973	AL0029706		
3177	GER from J. Foster, dated January 30, 1973	AL0029707		
3178	GER from Sportsman's Headquarters dated January 23, 1973	AL0029708		
3179	GER from Beikrich Ammunition Corporation dated January 16, 1973	AL0029709		
3180	GER serial no. 6403732 dated January 22, 1973	AL0029710		
3181	GER from Cooper's Sporting Goods dated January 15, 1973	AL0029711		
3182	GER from C. H. Dana, Jr. dated January 12, 1973	AL0029712		
3183	GER from Estell Curry dated January 11, 1973	AL0029713		
3184	GER from John's Sports Center dated January 9, 1973	AL0029714		
3185	GER from W. K. Fraysur dated January 4, 1973	AL0029715		
3186	GER from Dunham's dated January 4, 1973	AL0029716		
3187	GER from Oshman's Sporting Goods Company dated January 2, 1973	AL0029717		
3188	GER from Kayton Manufacturing Company dated December 22, 1972	AL0029718		
3189	GER from Morley Brothers dated December 22, 1972	AL0029719		
3190	GER from Valley Home Supply Company dated December 18, 1972	AL0029720		
3191	GER from Southern Wisconsin Sports Center	AL0029721		
3192	GER from Bruce Wiggins Sports Shop dated December 18, 1972	AL0029722		
3193	GER from Dick's Sports Shop dated December 18, 1972	AL0029723		
3194	GER from Gallingham & Jones, Inc. December 15, 1972	AL0029724		
3195	GER from Best Products dated December 15, 1972	AL0029725		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3196	GER from Bill's Sport and Hobby Shop dated December 14, 1972	AL0029726		
3197	GER from Graf & Sons, Inc. dated December 7, 1972	AL0029727		
3198	GER from Community Hardware Company dated December 5, 1972	AL0029728		
3199	GER from Herter's, Inc. dated December 5, 1972	AL0029729		
3200	GER from Frontiersman Sports, Inc. dated November 27, 1972	AL0029730		
3201	GER from Donaldson's Gun Shop dated November 22, 1972	AL0029731		
3202	GER from Bay City Hardware Company dated January 4, 1972	AL0029732		
3203	GER from Charles W. Fisher dated November 16, 1972	AL0029733		
3204	GER from Montgomery Ward, Richmond, CA dated November 15, 1972	AL0029734		
3205	GER from Ron Shirk's Shooters Supplies dated November 13, 1972	AL0029735		
3206	GER from Grants' for Guns, Inc. dated November 13, 1972	AL0029736		
3207	GER from John Payne dated November 10, 1972	AL0029737		
3208	GER from Loar Jewelry Company dated October 30, 1972	AL0029738		
3209	GER from Halstead House & Garden dated October 20, 1972	AL0029739		
3210	GER from Denny's Home dated October 18, 1972	AL0029740		
3211	GER from Southern Gun Distributer, Inc. dated October 10, 1972	AL0029741		
3212	GER from K-Mart Enterprises, Royal Oak, MI dated October 5, 1972	AL0029742		
3213	GER from DESA Industries dated October 4, 1972	AL0029743		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3214	GER from Klinedinst & Hopper October 24, 1972	AL0029744		
3215	GER from Schoellkopf Company dated August 24, 1972	AL0029745		
3216	GER from Henry L. Frame dated August 16, 1972	AL0029746		
3217	GER from Highspire Sporting Goods, Inc. dated August 14, 1972	AL0029747		
3218	Document from L. Fox to L. J. Boyle and S. M. Alvis dated August 14, 1972 regarding complaint in fitting telescopes	AL0029748-50		
3219	GER from S. R. Mayhoul dated July 24, 1972	AL0029751		
3220	GER from Billings Police Department dated July 21, 1972	AL0029752		
3221	GER from Leo D. Jones dated July 21, 1972	AL0029753		
3222	GER from Gustave Gunderson dated July 14, 1972	AL0029754		
3223	GER from H. L. Peters, Inc. dated July 13, 1972	AL0029755		
3224	GER from Christman's Inc. dated July 12, 1972	AL0029756		
3225	GER from Meyer Howe & Sportings, Inc. dated July 6, 1972	AL0029757		
3226	GER from Sportsmen's Den dated June 19, 1972	AL0029758		
3227	GER from Leo's Custom Stocks dated June 14, 1972	AL0029759		
3228	GER from J. V. Eliot, Jr. dated June 12, 1972	AL0029760		
3229	GER from Ron McKinney dated June 16, 1971	AL0029761		
3230	GER from Odell Howe Company dated May 1, 1972	AL0029762		
3231	GER from Rudy's Gun Exchange dated May 1, 1972	AL0029763		
3232	GER from William H. Ulery dated November 15, 1971	AL0029764		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3233	GER from Christy Gun Works dated November 12, 1971	AL0029765		
3234	GER from Gen. Sports Supply Company dated October 4, 1971	AL0029766		
3235	GER from Alvin A. Smith dated May 9, 1972	AL0029767		
3236	GER from Brach Hardware Company March 13, 1972	AL0029768		
3237	GER from Gibson Products, Inc. dated march 10, 1972	AL0029769		
3238	GER from Ackerman's First Aid Supplies dated March 13, 1972	AL0029770		
3239	GER from Gibson Products Company dated march 8, 1972	AL0029771		
3240	GER from Connors Sporting Goods dated March 7, 1972	AL0029772		
3241	GER from Donald Gagnon dated February 25, 1972	AL0029773		
3242	GER from Wisler Western Arms, Inc. dated December 7, 1967	AL0029774		
3243	GER from Denver, CO dated January 22, 1970	AL0029775		
3244	GER from Lima, OH dated November 2, 1970	AL0029776		
3245	GER from Eau Claire, WI dated November 3, 1970	AL0029777		
3246	GER from Nagel's Gun Shop dated January 24, 1971	AL0029778		
3247	GER from Joe W. Harris dated March 9, 1971	AL0029779		
3248	GER from National Park Services, Kahului, Maui, HI dated June 2, 1971	AL0029780		
3249	GER from National Park Services, Kahului, Maui, HI dated June 28, 1971	AL0029781		
3250	GER from National Park Services, Kahului, Maui, HI dated June 28, 1971	AL0029782		
3251	GER from Allen L. Wood dated September 26, 1971	AL0029783		
3252	GER from The Sportsman dated November 8, 1971	AL0029784		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3253	GER from Big Bear Stores, Inc. dated December 14, 1971	AL0029785		
3254	GER from Biggs Sporting Goods dated November 18, 1971	AL0029786		
3255	GER from Pecos Sporting Goods dated December 27, 1971	AL0029787		
3256	GER from Durk's Supply Shooter dated February 1, 1972	AL0029788		
3257	GER from Bill Dotsun's, Inc. dated February 2, 1972	AL0029789		
3258	GER from Blish, Mise & Silling, Inc. dated February 1, 1972	AL0029790		
3259	GER from Bonitz Brothers, Inc. dated January 31, 1972	AL0029791		
3260	GER from Mark Road, Shooters Supply dated January 28, 1972	AL0029792		
3261	GER from Bay City Hardware Company dated January 27, 1972	AL0029793		
3262	GER from Dunn's Sporting Goods, Inc. dated January 26, 1972	AL0029794		
3263	GER from Caddie Labar's Distributor Company dated January 12, 1972	AL0029795		
3264	GER from H&H Sporting Goods, Inc. dated December 21, 1971	AL0029796		
3265	GER from Jensen Byrd Company dated December 13, 1971	AL0029797		
3266	GER from Queen City Distributing Company dated December 8, 1971	AL0029798		
3267	GER from GYH Sport, Inc. dated December 9, 1971	AL0029799		
3268	GER from Bob's Gun Shop dated November 30, 1971	AL0029800		
3269	GER from Bowling, Inc. dated November 8, 1971	AL0029801		
3270	GER from United Dist. dated July 30, 1971	AL0029802		
3271	GER from H. P. Cox, Meek High School dated June 29, 1971	AL0029803		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3272	GER from J. C. Penney, King of Prussia, PA dated June 29, 1971	AL0029804		
3273	GER from National Park Services, Kahului, Maui, HI dated June 3, 1971	AL0029805		
3274	GER from Max Mermelstein Dist. dated April 28, 1971	AL0029806		
3275	GER from Schoenstein's dated April 23, 1971	AL0029807		
3276	GER from Montgomery Ward dated April 26, 1971	AL0029808		
3277	GER from Tempe, AZ police Department dated April 22, 1971	AL0029809		
3278	GER from Lloyd Company dated April 23, 1971	AL0029810		
3279	GER from Kenneth Johnson dated March 15, 1971	AL0029811		
3280	GER from Globe #10 dated March 1, 1971	AL0029812		
3281	GER from Erbacher's Sports Center dated March 1, 1971	AL0029813		
3282	GER from Green Brook Sportsman dated January 26, 1971	AL0029814		
3283	GER from Lefayor's Ski Shop dated January 4, 1971	AL0029815		
3284	GER from John M. Angelo dated January 12, 1971	AL0029816		
3285	Correspondence from L. Fox Regarding Model 700 to Hugh wilson dated November 3, 1969	AL0029817-18		
3286	GER from Flo. dated October 1970, serial no. G834951	AL0029819		
3287	GER from Oconto, Wisconsin dated November 2, 1970	AL0029820		
3288	GER from Shae's Hardware dated November 9, 1972	AL0029821		
3289	GER from Dakin Sports Goods Co. dated November 12, 1970	AL0029822		
3290	GER from Gold Bush Sales dated November 17, 1970	AL0029823		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3291	GER from [illegible] dated December [illegible]	AL0029824		
3292	GER from R. Royse dated December 3, 1970	AL0029825		
3293	GER from Saddle Elec. Co., Vernal, Utah dated November 23, 1970	AL0029826		
3294	GER from Kroegers Farm Supply dated December 12, 1970	AL0029827		
3295	GER from Harder Spt. Goods dated December 15, 1970	AL0029828		
3296	GER from Leonard's, Ft. Worth, TX, dated December 21, 1970	AL0029829		
3297	GER from J. L. Hunting Company, Detroit, MI dated December 21, 1970	AL0029830		
3298	GER from K-Mart Sporting Division, St. Clair Shores, MI dated January 6, 1971	AL0029831		
3299	GER from Remington Arms of Canada dated January 11, 1971	AL0029832		
3300	Model 700 Customer Guns Returned by Complaint-Month received and Yearly Total dated 1963 (includes 1962 total)	AL0029833		
3301	Model 700 Total Complaints (Except up to Std. for 1962 and 1963	AL0029834		
3302	Model 700 - Functional Month Produced/Month Returned for 1962 and 1963	AL0029835		
3303	Model 700 Stock Broken/Stock Finish & Checkering for Month Produced/Month Returned 1962 and 1963	AL0029836		
3304	Handwritten list--M/700 trial use of LPS instead of Molycot for use of control of trigger pool dated May 18, 1974	AL0029838		
3305	Handwritten document M/700 trigger and trigger connector	AL0029839		
3306	GER from Centralia, IL dated October 16, 1970	AL0029841		
3307	GER from Markleysburg, PA dated October 15, 1970	AL0029842		
3308	GER from Livonia, MI dated October 16, 1970	AL0029843		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3309	GER from Davison, MI dated October 2, 1970	AL0029844		
3310	Memo to J. H. Carter, G. E. Fletcher, J. P. Linde, M/700 Fire Control - Remove Bolt Lock dated February 8, 1982	AL0029845-46		
3311	M/700 Fire Control Conversion - Remove Bolt Lock [no date]	AL0029847		
3312	Memo from T. L. Capeletti to C. B. Workman dated December 16, 1981	AL0029854-56		
3313	Memo to Clark Workman from Wayne Leek dated January 15, 1982	AL0029868-70		
3314	Memo to Rogers S. White from Wayne Leek January 4, 1982	AL0029871-72		
3315	Memo to Clark Workman from Wayne Leek dated January 15, 1982	AL0029877-902		
3316	Letter to Clark Workman from Merle Walker dated March 12, 1982	AL0029957-58		
3317	Memo to T. L. Capeletti from F. E. Martin dated March 16, 1982	AL0029959		
3318	GER from Oshman's dated January 23, 1973	AL0029978		
3319	GER from Dick Chalot Sporting Goods, dated December 20, 1972	AL0029979		
3320	GER from James Harter dated October 11, 1972	AL0029980		
3321	GER Al Knabb dated July 6, 1972	AL0029981		
3322	Letter from C. F. Prosser to A. D. Kerr, Trip to New York City Police Academy dated June 30, 1972	AL0029982		
3323	GER Joseph D. Puoy dated May 17, 1971	AL0029983		
3324	GER North Shore Sporting Goods dated April 27, 1971	AL0029984		
3325	GER Olson's Sporting Goods dated March 12, 1971	AL0029985		
3326	Listing of M/600 Guns Returned by complaint, month received and yearly total for 1966, including 1964 and 65 totals)	AL0029986-99		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3327	Memo to R. L. Hall from E. R. Carr dated February 7, 1975 regarding Mohawk 600 Safety Malfunction	AL0030000		
3328	Memo to W. E. Leek from A. A. Hugick and F. E. Martin dated January 28, 1975 regarding Mohawk 600 Quality Audit	AL0030002-14		
3329	GER from Leonard R. Griffith dated January 24, 1971	AL0030015		
3330	GER from George Ozenduff dated October 3, 1972	AL0030016		
3331	GER from New York City Police Department dated June 21, 1972	AL0030017		
3332	GER from New York City Police Department dated June 21, 1972	AL0030018		
3333	GER from New York City Police Department dated June 21, 1972	AL0030019		
3334	GER from New York City Police Department dated June 21, 1972	AL0030020		
3335	GER from Lakeview Sporting Shop dated June 17, 1972	AL0030021		
3336	GER from W. H. Smith Hardware dated July 16, 1971	AL0030022		
3337	GER from Schneider's dated May 16, 1972	AL0030023		
3338	GER from J. W. Cummings, Sr. dated December 28, 1971	AL0030024		
3339	GER from Thompson's in Howard, PA dated December 27, 1971	AL0030025		
3340	GER from D. J. Piasecky dated November 18, 1971	AL0030026		
3341	GER from Gun Rack, Inc. dated September 23, 1971	AL0030027		
3342	GER from R. J. Gramazio dated July 28, 1971	AL0030028		
3343	GER from Coast to Coast Stores in Nampa, ID dated July 28, 1971	AL0030029		
3344	GER from Chubon's Hardware dated March 15, 1971	AL0030030		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3345	GER from James Rittenhouse dated June 8, 1970	AL0030031		
3346	GER from Florida Howe Company dated November 16, 1970	AL0030032		
3347	GER from Al Fishing Tackle, Inc. dated November 6, 1970	AL0030033		
3348	GER from Greene, NY dated November 2, 1970	AL0030034		
3349	GER from Bronx, New York, New York dated November 4, 1970	AL0030035		
3350	Procedure for Replacement of Trigger Housing Assemblies Models 600, 660 and Mohawk 600 only dated October 27, 1978	AL0030036-45		
3351	Procedure for Replacement of Trigger Housing Assemblies Models 600, 660 and Mohawk 600 only dated December 1, 1978	AL0030106-110		
3352	Handwritten document entitled Null Screw Driver Test dated April 2, 1979, Revised 1986	AL0030137-39		
3353	Appropriation request for Project No. FD-721 entitled Model 721-722 Bolt Action High Power Center Fire Rifle dated April 13, 1948	AL0030144-182		
3354	Research test and measurement report no. 830423 by C. E. Ritchie dated February 12, 1983	AL0030245-283		
3355	Memo to C. B. Workman from A. A. Hugick regarding M/700 - 30.06 1,000 proof evaluation test dated July 19, 1973	AL0030417-419		
3356	Article by Bob Hagel entitled "Hunting Rifle Saftics" from <u>Rifle</u> magazine March/April 1978	AL0030475-76		
3357	Document from J. P. Linde entitled Recall of Mohawk 600 Rifles--Updated Status dated October 26, 1978	AL0030506-509		
3358	News Release dated October 25, 1978 regarding recall of M/600 Rifles.	AL0030517-523		
3359	Memo to J. R. Ayers from H. K. Boyle dated November 30, 1978 regarding M/600 Trigger Assemblies	AL0030534		

Exhibit Number	Description	Bates Number(s)	Offered	Admitted
3360	Memo from J. P. Linde to R. L. Hall dated February 12, 1979 regarding status of XP/100 Pistol	AL0030534		
3361	Document entitled Common Parts M/700-600 Fire Controls dated November 2, 1978	AL0030544		
3362	Handwritten document from R. H. Brown to R. L. Hall dated October 24, 1978	AL0030553		
3363	Memo to C. B. Workman from A. A. Hugick dated June 23, 1966, regarding drop testing of M/600 Powder Metal Sears	AL0030562-67		
3364	Typewritten List of Rifle Type Trigger Pull and Firing Pin Indent from C. J. S. June 14, 1982	AL0030671		
3365	Memo to E.G. Larson from A.J. Stekl dated February 26, 1980 re: Fred Woodrick Phone call of February 25	AL0170509		
3366	Interim Report - Functional and Endurance Test of Standard Fire Control and Alternate Safety Type 1 Fire Control for M/721-722 Rifles dated September 15, 1948	AL0031905-916		
3367	Memo to L. Fox from Alvis re M/700 Fire Control - Trigger Adjusting Screw dated February 22, 1972	AL0031917-19		
3368	Memo to E.G. Larson from E.F. Sienkiewicz re Rifles Returned for Fire on Safe Release, dated February 22, 1979	AL0031429		
3369	Memo to J.E. Preiser from E.G. Larson dated February 26, 1979 re: Returned Bolt Action Rifles	AL0031452		

Respectfully submitted,

WOOLSEY, FISHER, WHITEAKER & McDONALD  
A Professional Corporation

By Richard C. Miller  
Richard C. Miller, Bar No. 29595

Post Office Box 1245  
Springfield, MO 65801  
(417) 869-0581

F:\C88\Alexsich.Zex

CERTIFICATE OF SERVICE

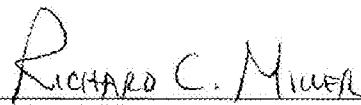
The undersigned hereby certifies that a copy of the foregoing was mailed to all attorneys of record by placing same in the United States Mail, postage prepaid, duly addressed to their business address on the 16th day of March, 1995.

Mr. Frank Burgess  
Burgess, Joyce & Whelan  
2801 South Montana Street  
Butte, MT 59701

Mr. John Shaw  
Bryan Cave  
3300 One Kansas City Place  
1200 Main Street  
P.O. Box 419914  
Kansas City, MO 64141-6914

Mr. A. Lance Tonn  
Lucas & Monaghan, P.C.  
P. O. Box 728  
Miles City, MT 59301

Mr. Robert Carlson  
Coretti, Pohlman, Allen, Black & Carlson  
P. O. Box 5090  
Butte, MT 59703-0509

  
\_\_\_\_\_  
Richard C. Miller

WOOLSEY, FISHER, WHITEAKER & McDONALD  
P. O. Box 1245  
300 S. Jefferson, Suite 600  
Springfield, MO 65801  
Telephone: (417) 869-0581

02285/89001  
P:\afr\remingto\aleksich.2ex