

**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 4
SEE SECOND REQUEST FOR PRODUCTION**

1 E. Richard Bodyfelt
 2 Peter R. Chamberlain
 3 BODYFELT, MOUNT, STROUP
 4 & CHAMBERLAIN
 5 214 Mohawk Building
 6 308 S.W. Third Avenue
 7 Portland, OR 97204
 8 Telephone: (503) 243-1022

9 Of Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT

11 FOR THE DISTRICT OF OREGON

12	TERI SEE and DARREL SEE,)	
13	wife and husband,)	
14)	
15	Plaintiffs,)	Civil No. 21-886
16)	
17	v.)	
18)	
19	REMINGTON ARMS COMPANY, INC.,)	PLAINTIFFS' SECOND
20	a Delaware corporation,)	REQUEST FOR PRODUCTION
21)	
22	Defendants.)	

23 Pursuant to FRCP 34, plaintiffs request that defendant
 24 produce for inspection and copying, within 30 days of the date of
 25 service of this request, the documents set forth below. As used
 26 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 & Chamberlain, Room
 214, 708 S.W. Third Avenue, Portland, Oregon.

27 DOCUMENTS

28 14. All manufacturing, trade and governmental standards,
 29 codes or regulations with which defendant complied or attempted

1 to comply, whether suggested, voluntary or mandatory, in and
2 related to the design, manufacture and sale of the Remington
3 Model 700 rifle during the period 1975 through 1981.

4 15. All test procedures and test results for all tests
5 performed on the Remington Model 700 rifles which were the sub-
6 ject of the 49 gun examination reports produced by defendant.

7 16. The gun examination report for defendant's examination
8 of this rifle.

9 17. All test procedures and test results for all tests
10 performed on the trigger mechanism of the Remington Model 700
11 rifle in the design and manufacture of that weapon.

12 18. All test procedures and test results for all tests
13 performed on the safety mechanism of the Remington Model 700
14 rifle in the design and manufacture of that weapon.

15 19. All letters, memoranda, notes or other correspondence
16 which gave rise to the preparation of the 49 gun examination
17 reports previously produced by defendant.

18 20. All documents in your possession relating to the law-
19 suits previously produced by defendant.

20 DATED this 10th day of May, 1982.

21 BODYFELT, MOUNT, STROUP
22 & CHAMBERLAIN

23 By _____
24 Peter R. Chamberlain, Of
25 Attorneys for Plaintiffs
26