

**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 5
DEFENDANT'S OBJECTION TO PLAINTIFFS'
REQUEST FOR PRODUCTION**

U.S. DISTRICT COURT
DISTRICT OF OREGON
FILED

FEB 23 1982

ROBERT M. CHRIST, CLERK
BY *[Signature]* DEPUTY

JAMES D. HUEGLI
Schwabe, Williamson, Wyatt,
Moore & Roberts
1200 Standard Plaza
Portland, OR 97204
Telephone: 222-9981

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

TERI SEE and DARREL SEE,	)	
wife and husband,	)	
	)	
Plaintiffs,	)	Civil No. 81-886
	)	
vs.	)	
	)	
REMINGTON ARMS COMPANY, INC.,	)	OBJECTION TO MOTION
a Delaware corporation,	)	FOR PRODUCTION PURSUANT
	)	TO FRCP 34(B)
Defendant.	)	

Defendant in the above-captioned matter specifically objects to plaintiff's Request for Production #7, #9, #11, #12 and #13, as said Request for Production is irrelevant and immaterial. There is no allegation contained in any of plaintiff's pleadings nor is there any allegation of fact in the record that Remington Model 600 Rifle has any bearing whatsoever upon the lawsuit in this case. The rifle in question, according to paragraph 5 of plaintiff's Complaint, is the Remington Model 700. Said request is cumbersome and burdensome, and the defendant refuses to comply with this request.

The defendant further objects to Request for Production

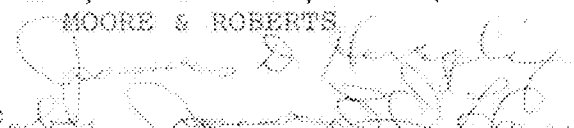
Page 1 - OBJECTIONS TO MOTION FOR PRODUCTION

SCHWABE, WILLIAMSON, WYATT, MOORE & ROBERTS
Attorneys at Law
1200 Standard Plaza
Portland, Oregon 97204
Telephone 222-9981

cont'd.

1 #8, as said Request for Production is too broad to enable
2 defendant to adequately produce said documents. If the
3 plaintiff would specifically request which tests they are
4 interested in, the defendant would be more adequately able
5 to analyze this request.

6 SCHWABE, WILLIAMSON, WYATT,
7 MOORE & ROBERTS

8 By: 
9 James D. Guegli, OSB #72306
Attorney for Defendant

CERTIFICATE — TRUE COPY

I hereby certify that the foregoing copy of _____
_____ is a complete and exact copy of the original.

Dated _____, 19____.

Attorney(s) for _____

ACCEPTANCE OF SERVICE

Due service of the within _____ is hereby accepted
on _____, 19____, by receiving a true copy thereof.

Attorney(s) for _____

CERTIFICATES OF SERVICE

Personal

I certify that on _____, 19____, I served the within _____
_____ on _____
attorney of record for _____
by personally handing to said attorney a true copy thereof.

Attorney(s) for _____

At Office

I certify that on _____, 19____, I served the within _____
_____ on _____
attorney of record for _____
by leaving a true copy thereof at said attorney's office with his/her clerk therein, or with a person apparently in
charge thereof, at _____, Oregon.

Attorney(s) for _____

Mailing

I hereby certify that I served the foregoing Objection to Motion for Production
_____ on Peter R. Chamberlain
_____ attorney(s) of record for plaintiff
on February 22, 1982, by mailing to said attorney(s) a true copy thereof, certified by me
as such, contained in a sealed envelope, with postage paid, addressed to said attorney(s) at said attorney(s) last
known address, to-wit: 229 Mohawk Building, Portland, OR 97204
_____ and deposited in the post office at Portland, Oregon, on said day.
Dated February 22, 1982.

Attorney(s) for Defendant

SCHWABE, WILLIAMSON, WYATT,
MOORE & ROBERTS
ATTORNEYS AT LAW
1800 Broadway Plaza
Portland, Oregon 97204
Telephone 252-7581

BACKING SHEET

FORM No. 100-1-1 STAVENS NEWS LAW FIRM INC., PORTLAND, ORE. 1/1/80-8