

NO. 91-11-10856-CV

GLENN W. COLLINS and	§	IN THE DISTRICT COURT OF
GLEND A. COLLINS	§	
	§	
VS.	§	
	§	MAVERICK COUNTY, TEXAS
REMINGTON ARMS COMPANY, INC.,	§	
E. I. DU PONT DE NEMOURS	§	
AND COMPANY, and GLENN W.	§	
SLADE, JR. D/B/A GLENN SLADE	§	
SPORTING GOODS	§	293RD JUDICIAL DISTRICT

**AFFIDAVIT OF ROBERT A. CHAFFIN  
REGARDING THE MAY 31, 1985 MEMORANDUM**

THE STATE OF TEXAS	§
	§
COUNTY OF HARRIS	§

BEFORE ME, the undersigned authority personally appeared ROBERT A. CHAFFIN, who after being first duly sworn, deposed and said:


"My name is ROBERT A. CHAFFIN. I am of full age and sound mind, have never been convicted of a crime and have personal knowledge of the facts stated herein and they are true and correct. I am an attorney licensed to practice in the State of Texas and my State Bar number is 04057500. I acquired these facts in the course of my representation of Plaintiffs in other cases against Remington Arms Company, Inc., in this cause, and as a result of my personal observations during the events recited below.

"On October 9, 1989, I was in the Houston offices of Vinson & Elkins at the invitation of Mr. David Demars, attorney for Remington Arms Company, Inc. to view documents produced in response to Plaintiffs' previous Requests for Discovery in Cause 13,461, styled Lauro Homer Chapa, et al. v. Remington Arms Company, Inc., et al., in the 229th Judicial District Court for Duval County, Texas. Part of that production included a one page document given the date of May 31, 1985. Although the document seemed to be part of a larger document, I was provided with only one page dated May 31, 1985.

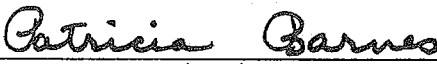
"In the course of my inspection of this document, I made a handwritten copy. I personally requested a photocopy of this document but Remington refused to provide a photocopy and Remington's refusal has continued to this day.

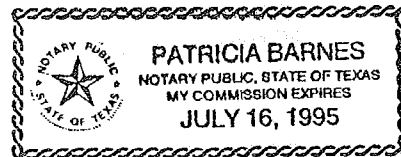
"The attached transcription of the May 31, 1985, document was prepared under my supervision and is a true and correct transcription of my handwritten notes."

Further, Affiant sayth not.

  
ROBERT A. CHAFFIN

SUBSCRIBED AND SWORN TO BEFORE ME, to certify which witness my hand and seal of office this 31<sup>st</sup> day of March, 1992.

  
Notary Public in and for  
the State of Texas



# **Firearms Business Team Meeting**

## **May 31, 1985**

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**File: Bolt Action Rifle**

**(Replacement for the Model 700)**

**J.W. Bower's letter to W.H. Coleman, II**

### **9. New Bolt Action Rifle**

**This rifle has been designed as a replacement for the Model 700. Technical improvements include:**

- ◆ **An improved fire control containing:**
  - **preset engagement and overtravel**
  - **customer adjustable trigger pull to a safe lower limit**
  - **steel trigger and sear**
- ◆ **a safety that blocks both the trigger and sear**
- ◆ **a bolt lock which allows the customer to unload the gun with the safety on**

**Marketing has completed initial focus panels to guide the design evolution.**

**Revisions to the fire control are in the final design stage. Additional prototypes will be ready for development testing this summer.**

FIREARMS BUSINESS TEAM MEETING  
MAY 31, 1985

FILE: BOLT ACTION RIFLE  
(REPLACEMENT FOR THE MODEL 700)  
J. W. BOWER'S LETTER TO W. H. COLEMAN, II

9. NEW BOLT ACTION RIFLE

THIS RIFLE HAS BEEN DESIGNED AS A REPLACEMENT FOR THE MODEL 700. TECHNICAL IMPROVEMENTS INCLUDE:

- O AN IMPROVED FIRE CONTROL CONTAINING:
  - PRESET ENGAGEMENT AND OVERTRAVEL
  - CUSTOMER ADJUSTABLE TRIGGER PULL TO A SAFE LOWER LIMIT
  - STEEL TRIGGER AND SEAR
- O A SAFETY THAT BLOCKS BOTH THE TRIGGER AND SEAR
- O A BOLT LOCK WHICH ALLOWS THE CUSTOMER TO UNLOAD THE GUN WITH THE SAFETY ON

MARKETING HAS COMPLETED INITIAL FOCUS PANELS TO GUIDE THE DESIGN EVOLUTION.

REVISIONS TO THE FIRE CONTROL ARE IN THE FINAL DESIGN STAGE. ADDITIONAL PROTOTYPES WILL BE READY FOR DEVELOPMENT TESTING THIS SUMMER.

PLAINTIFF'S  
EXHIBIT

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