

NO. FBT CV 15 6048103 S : SUPERIOR COURT  
DONNA L. SOTO, ADMINISTRATRIX  
OF THE ESTATE OF  
VICTORIA L. SOTO, ET AL : JUDICIAL DISTRICT OF FAIRFIELD  
V. : AT BRIDGEPORT  
BUSHMASTER FIREARMS  
INTERNATIONAL, LLC, a/k/a, ET AL : MAY 12, 2016

**PLAINTIFFS' MOTION SEEKING ADDITIONAL ORDERS REGARDING  
THE REMINGTON DEFENDANTS' OBJECTIONS AND PRODUCTION  
OBLIGATIONS IN RESPONSE TO THE PLAINTIFFS' FIRST REQUEST  
FOR PRODUCTION**

The plaintiffs have today filed a Partial Objection to the Remington defendants' Motion for Extension of Time in which to object and respond to the Plaintiffs' First Requests for Production.

For the reasons set forth in that Partial Objection, the plaintiffs seek the following additional orders:

- A. The Remington defendants shall file any Objections to the first Requests for Production by May 16, 2016;
- B. Counsel for the Remington defendants and counsel for the plaintiffs shall confer regarding such Objections on or before June 2, 2016;
- C. Counsel shall contact Caseflow and select a hearing time the week of June 6, 2016, at which the Court may hear argument on such Objections, if it deems such argument necessary;
- D. The Remington defendants shall begin to produce documents not subject to objection on May 16, 2016, and shall complete production of such documents by June 13, 2016.



## CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, and emailed this day to all counsel of record, to wit:

*For Bushmaster Firearms International LLC, a/k/a;  
Freedom Group, Inc., a/k/a;  
Bushmaster Firearms, a/k/a;  
Bushmaster Firearms, Inc., a/k/a;  
Bushmaster Holdings, Inc., a/k/a  
Remington Arms Company, LLC, a/k/a;  
Remington Outdoor Company, Inc., a/k/a*

Jonathan P. Whitcomb, Esq.  
Diserio Martin O'Connor & Castiglioni, LLP  
One Atlantic Street  
Stamford, CT 06901  
[jwhitcomb@dmoc.com](mailto:jwhitcomb@dmoc.com)  
TEL: (203) 358-0800  
FAX: (203) 348-2321

Andrew A. Lothson, Esq.  
James B. Vogts, Esq.  
Swanson Martin & Bell, LLP  
330 North Wabash, #3300  
Chicago, IL 60611  
[alothson@smbtrials.com](mailto:alothson@smbtrials.com)  
[jvogts@smbtrials.com](mailto:jvogts@smbtrials.com)  
TEL: (312) 321-9100  
FAX: (312) 321-0990

*For Camfour, Inc.;*  
*Camfour Holding, LLP, a/k/a*

Scott Charles Allan, Esq.  
Renzulli Law Firm, LLP  
81 Main Street, #508  
White Plains, NY 10601  
[sallan@renzullilaw.com](mailto:sallan@renzullilaw.com)  
TEL: (914) 285-0700  
FAX: (914) 285-1213

*For Riverview Sales, Inc.;*  
*David LaGuercia*  
Peter Matthew Berry, Esq.  
Berry Law LLC  
107 Old Windsor Road, 2<sup>nd</sup> Floor  
Bloomfield, CT 06002  
[firm@berrylawllc.com](mailto:firm@berrylawllc.com)  
TEL: (860) 242-0800  
FAX: (860) 242-0804

/s/ Alinor C. Sterling  
**JOSHUA D. KOSKOFF**  
**ALINOR C. STERLING**  
**KATHERINE MESNER-HAGE**