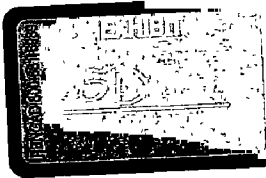


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6 Attorneys for Defendant STRICK
CORPORATION

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, SOUTHEAST DISTRICT

11 MARIA NELI RAMIREZ SILVA, et al.,
12 Plaintiffs,
13 vs.
14 KEYSTONE FREIGHT CORP., et al.,
15 Defendants.

CASE NO. VC048745

**STRICK CORPORATION'S
SUPPLEMENTAL RESPONSE TO
PLAINTIFFS' DEMAND FOR
PRODUCTION OF DOCUMENTS, SET
NO. ONE**

Assigned to Hon. Brian F. Gasdia, Dept. F

Action Filed: May 15, 2007
Trial Date: June 23, 2008

18 PROPOUNDING PARTY: PLAINTIFFS

19 RESPONDING PARTY: DEFENDANT STRICK CORPORATION

20 SET NO.: ONE

22 The responding party hereby supplements its prior responses to Plaintiff's Demand
23 for Production of Documents, Set No. 1, in particular Demand Numbers 3, 4, and 9. The
24 responding party incorporates all preliminary statements, objections and descriptions
25 contained in those responses as though fully set forth herein.
26

RESPONSES

SUPPLEMENTAL RESPONSE TO DEMAND NO. 3:

In addition to the documents already identified and produced by the responding party, the responding party hereby identifies and produces additional documents maintained by the responding party having do to with the discussion, design, development, testing, analysis, review and compliance of proposed and potential side underide devices. These documents are bates stamped SC 00451 through SC 00554.

SUPPLEMENTAL RESPONSE TO DEMAND NO. 4:

In addition to the documents already identified and produced by the responding party, the responding party hereby identifies and produces additional documents maintained by the responding party having do to with the discussion, design, development, testing, analysis, review and compliance of proposed and potential side underide devices. These documents are bates stamped SC 00451 through SC 00554.

SUPPLEMENTAL RESPONSE TO DEMAND NO. 9:

In addition to the documents already identified and produced by the responding party, the responding party hereby identifies and produces additional documents maintained by the responding party having do to with the discussion, design, development, testing, analysis, review and compliance of proposed and potential side underide devices. These documents are bates stamped SC 00451 through SC 00554.

DATED: April 18, 2008

MURCHISON & CUMMING, LLP

By: 

Friedrich W. Seitz
Richard C. Moreno
Attorneys for Defendant STRICK
CORPORATION

J:\FWS\27778\WTP\stricksuppsplf

○ To: J. Wilson

12/21/2010

Subj: Cost Est

Attached is my side guard cost estimate.

Please review for errors & go over it with Gary.

○

○

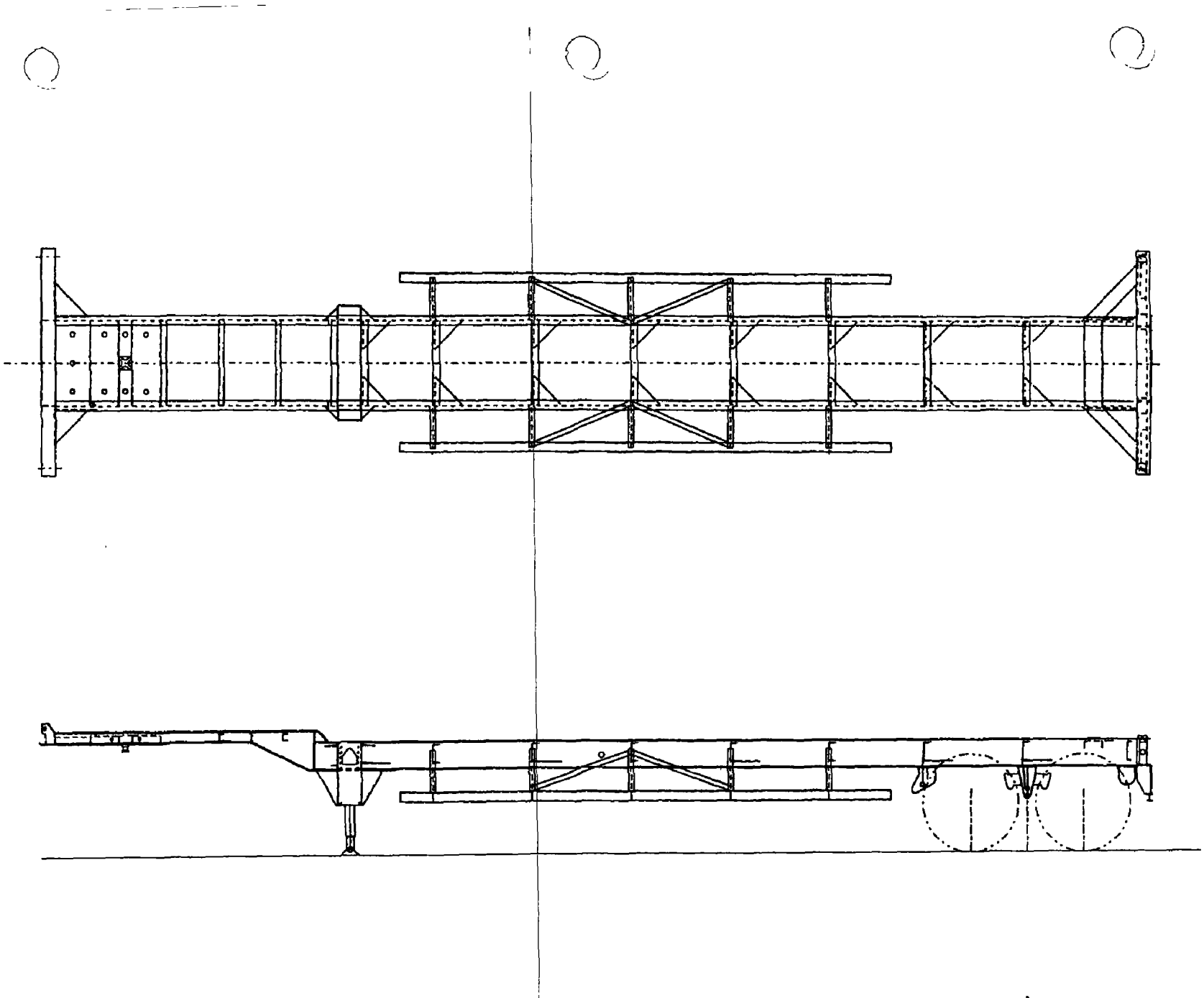
12/21/2010 *JMS*

PIPE GUARD ESTIMATE

slt @ 22¢/ft I @ 25¢/ft
 Tubing 28¢/ft 410 @ 735/ft

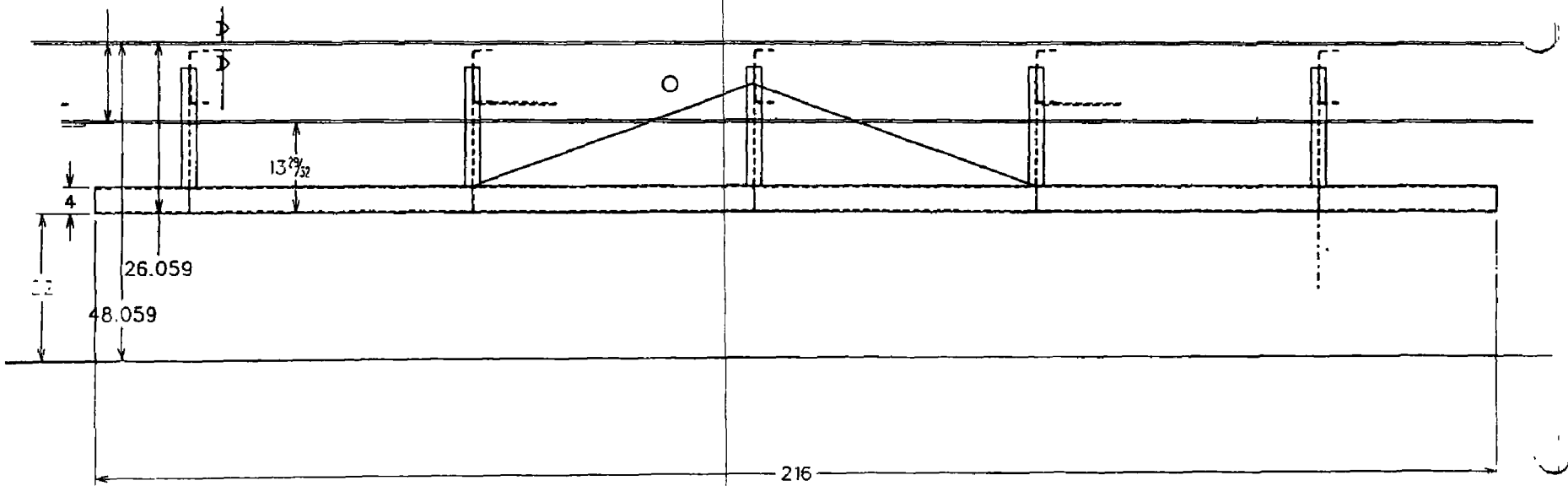
ITEM	DESCRIPTION	SIZE	WEIGHT EA	QUAN	MAT'L COST EA	LABOR & BUR EA	TOTAL
1	CROSS TIE	4" I 3.2# x 68"	18.1	5	4.52	—	22.65
2	SUPPORT	4" I x 21.7 are	6.4	10	1.60	1.60	32.00
3	LONGITUDINAL GUARD	4 x 4 x 3/16 x 216" (922)	170	2	47.60	—	95.20
4	XMBR	8 x 3 1/2 x 10g	21.6	5	4.15	1.60	31.75
5	GUSSET B590007	7g x 12 x 12 (13223)	3.65	20	.84	.64	29.60
6	CLIP	7g x 1 1/2 x 3 1/2	.27	20	.06	.50	11.20
7	3/8 BOLT & NUT	3/8 x 1		60	.05	—	3.00
8	DIAGONAL BRACE	4" I x 45" (48")	12.8	4	3.20	1.60	19.20
9	CLIP	2 1/2 x 5 x 10g	.50	8	.11	.50	4.98
10	3/8 BOLT & NUT	3/8 x 1		24	.05	—	1.20
	Paint						15.00
	WELD 20 GUSSETS			20		1.00	20.00
	WELD CLIPS			28		.15	4.20
	WELD CROSS TIES & LANG 7pc			5+2		.50	3.50
	INSTALL BOLTS			72		.10	7.20
	POSITION & INSTALL 4 guys 30 MIN			2hrs			70.00
							<u>\$ 4370.58</u>
	<u>DEDUCT</u>						
	Xmbc 12191	10g x 8	19.0	5	4.22	.96	< 25.90
	Gusset 13223	7g x 12 x 12	3.65	6	.84	.64	< 9.88
	WELD GUSSETS			6		1.00	< 6.00
	XMBR WELDING SAME						
							<u>2 (- 40.78)</u>
						TOTAL	<u>329.82</u> COST

[Handwritten scribble]



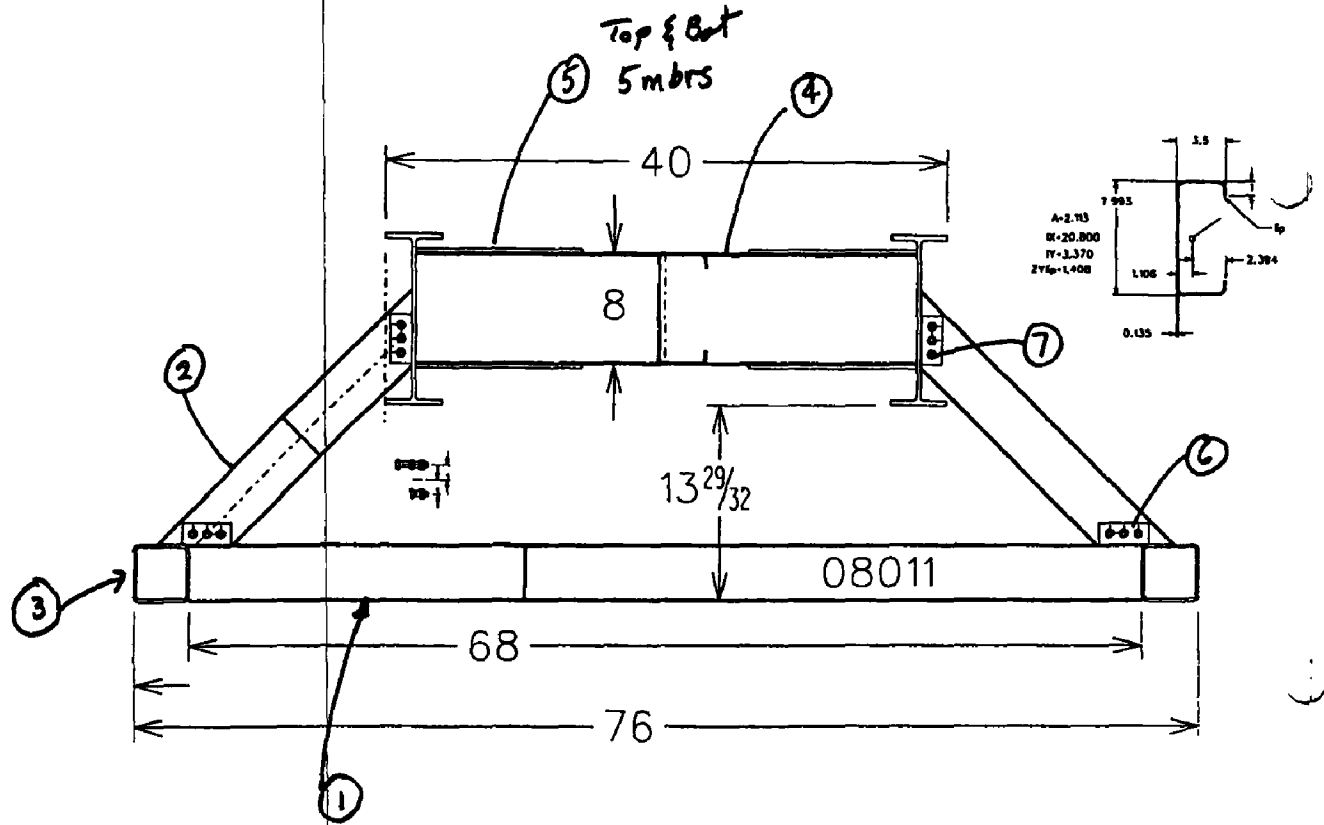
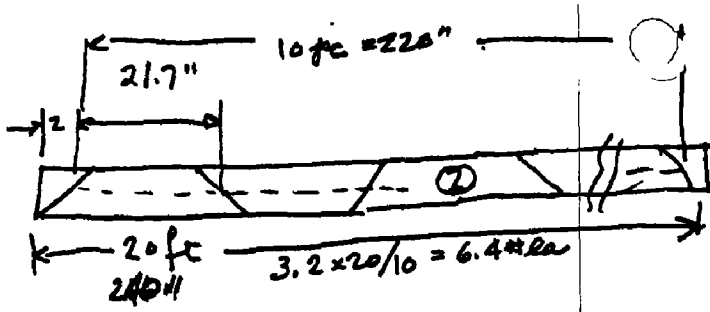
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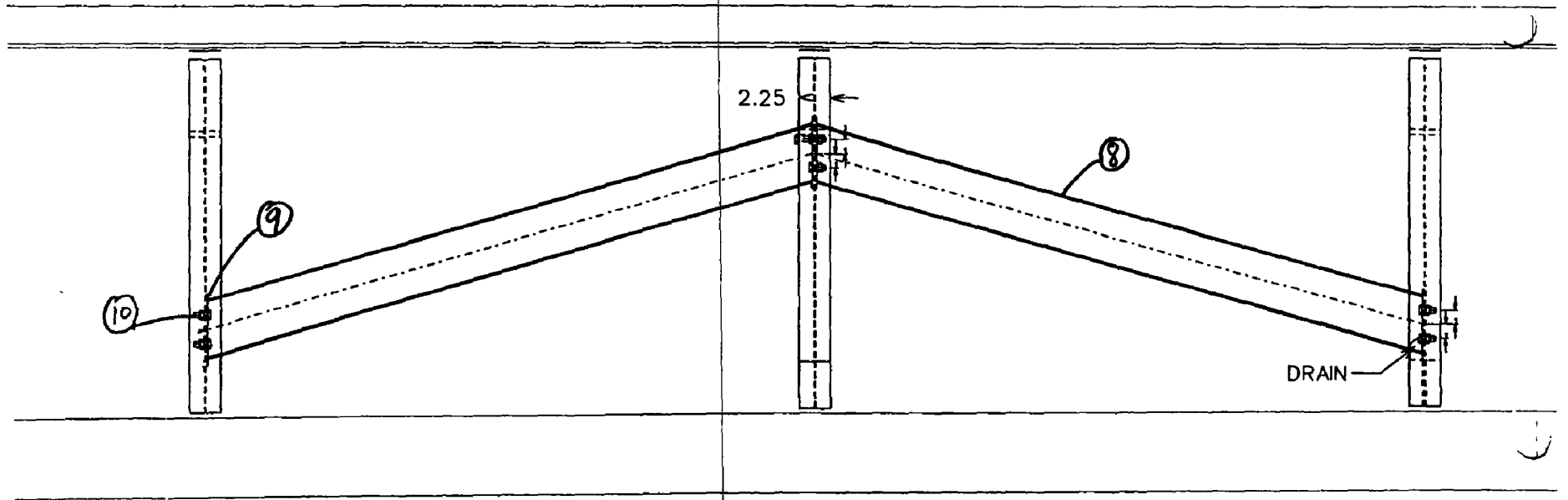
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bab



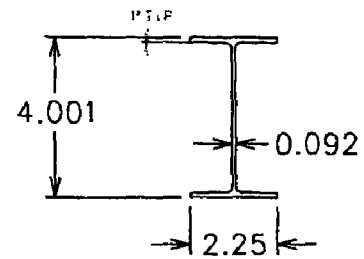
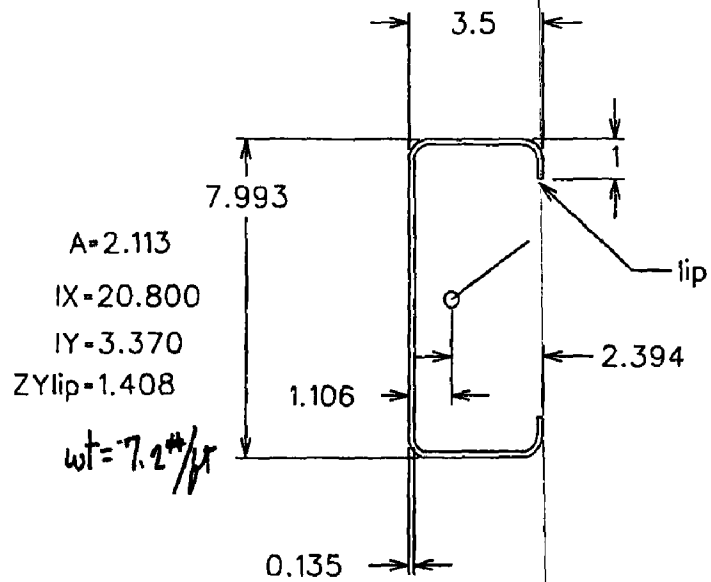
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12/11/2000



SC 0051.

12/21/2011
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