Friedrich W. Seitz (SBN 51536) 1 Richard C. Moreno (SBN 190869) MURCHISON & CUMMING, LLP 801 South Grand Avenue, 9th Floor Los Angeles, California 90017-4613 3 Telephone: (213) 623-7400 Facsimile: (213) 623-6336 4 E-Mail: fseitz@murchisonlaw.com 5 rmoreno@murchisonlaw.com Attorneys for Defendant STRICK 6 CORPÓRATION 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 COUNTY OF LOS ANGELES. SOUTHEAST DISTRICT 9 10 MARIA NELI RAMIREZ SILVA, et al., 11 CASE NO. VC048745 12 Plaintiffs. STRICK CORPORATION'S SUPPLEMENTAL RESPONSE TO 13 VS. PLAINTIFFS' DEMAND FOR PRODUCTION OF DOCUMENTS, SET 14 KEYSTONE FREIGHT CORP., et al., NO. ONE 15 Defendants. Assigned to Hon. Brian F. Gasdia, Dept. F. 16 Action Filed: May 15, 2007 Trial Date: June 23, 2008 17 18 PROPOUNDING PARTY: PLAINTIFFS 19 RESPONDING PARTY: DEFENDANT STRICK CORPORATION 20 SET NO.: ONE 21 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

27

28

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.

21 DATED: April 18, 2008

J:\FWS\27778\NTP\stricksuppspltf

MURCHISON & CUMMING, LLP

22

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

20

23

24

25

26

27

28

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

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

By:

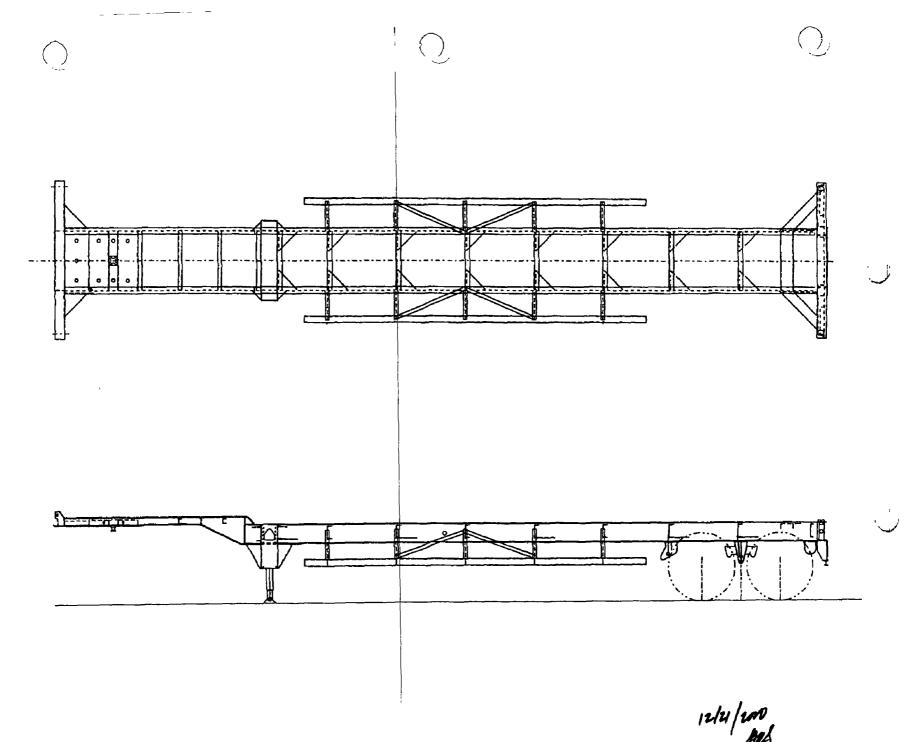
C To: J. Wilson

12/4 /2000

Sulj Cost Bot

Attached is my side guard cost estimate. Please review for errors & go over it with Gary.

| 12/21 | from Jad. | SIDE GUARE |) Es | 57 MATI | SHO Tubij | 224/# J 284/# 69 | 1@254/# BQ735/h |
|-------|---|-------------------------------|--|--------------|------------------|---------------------|--------------------|
| ITEM | DESCRIPTION | SIZE | WEIGHT | QUAN | MAT'L COST EA | LABOR | TOTAL |
| | CROSS TIE | 4"I3.2" × 68" | 18.1 | 5 | 4.53 | | 22.65 |
| 2 | CROSS TIE SUPPORT LONG TUDINAL GUAR XMBT GUSSET BS 10007 CLIP | 4" I ×21.7 are, | 6.4 | (0 | | 1.60 | 32.00 |
| 3_ | Long + 401NA - GUAR | 0 4x4+3/1672164/9A | 170 | 2 | 47.60 | | 95.20 |
| 4 | X Sbc | 8×34 ×109 79×12×12 (13223) | 21.6 | 5 | 4.15 | 1.60 | 31.75 |
| 5 | GUSSET B590007 | 74×12×120 (13223) | 3.65 | 20 | -84 | .64 | 29.60 |
| 4_ | CLIP | 79x 18x34 | 27 | 20 | .06 | .50 | 11.20 |
| -7- | 3/8 BOLT & NUT | 3/2×1 | | 60 | .05_ | | 3.10 |
| 8 | DIAGONAL BRACE | 4"] × 45" (48") | /2.8 | 4 | 3,20 | 1.60 | 19.20 |
| 9 | | 2%×5 + 10 | -50 | 8 | 11 | - 20 | 4.88 |
| 10 | 3/8 Boct & nut | 1/2×5 × 19 1/84 | | 24 | 5 | | 1.20 |
| | Paint | | ļ <u> </u> | | | | 15.00 |
| ļ | WELD 20 GUSSETS | | | 20 | | 1.00 | 20.00 |
| ļ.——— | WELD CLIPS | | ļ <u> </u> | 28 | | •15 | 4.20 |
| | MELD CLOSS TIES ELE | ng /pc | | 5+2 | | .50 | 3.50 |
| | NSTALL BOLTS | | - | 72 | | -10 | 7.10 |
| ļ | POSITION & INSTA | AL 4 GRAS SO WIN | <u> </u> | 2hrs | <u> </u> | -9 | 70.00 |
| | DE DUCT | | | | | 7 | (+370,58 |
| | ×nbr 12191 | 109 ×8 | 19.0 | 5 | 4.22 | .96 | < 25.90 |
| | Gusset 13223 | 10g x8 7g x12x12 | 3,65 | 6 | . 94 | .64 | 9,88 |
| | WELD GUSSETS | | | 6 | | 1,00 | 74.00. |
| | XMDT WELDING | SAME | | | | | |
| | , | | | | | 2 | - 40.78 |
| | | | | | | - | |
| | | | | | | TOTAL | 329. 8 |
| | | | | | | | (051 |
| | | | | | | | |
| | | | | | , | | |
| | | | ļ | | | | <u> </u> |
| | | | <u> </u> | | | | |
| 1 | | | | | | | |
| | | | | | | | |
| | | | | <u> </u> | | | |
| | | | | - | | | - |
| | | † | | | | | CC 005 |



クつ DD 5.1