

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

JAMES LEE VANN, JR.,

Plaintiff,

v.

CHIAPPA FIREARMS USA, LTD., OLIN
WINCHESTER, LLC, and FICTITIOUS
DEFENDANTS 1-4, those persons, corporations,
partnerships or entities who were responsible for the
design, manufacturing, testing, marketing, selling,
and/or distribution of the product which caused
injuries to the Plaintiff and/or whose acts caused or
contributed to the damages sustained by the Plaintiff,
whose identities are unknown to the Plaintiff, but
which will be substituted by amendment when
ascertained,

Defendants.

Case No.: 7:25-cv-00079-WLS

**STIPULATED ORDER CONCERNING THE NUMBER OF REQUESTS FOR
PRODUCTION PERMITTED TO BE SERVED BY EACH PARTY**

Plaintiff JAMES LEE VANN, JR. ("Plaintiff") and Defendant CHIAPPA FIREARMS
USA, LTD. ("Chiappa") hereby stipulate and agree as follows:

1. Local Rule 34 limits the number of requests for production that can be served by each party to ten (10) requests.
2. Plaintiff and Chiappa agree that this is a complex product liability matter requiring more than the standard ten (10) requests for production by and between them under Local Rule 34.
3. Plaintiff and Chiappa stipulate and agree that in the interest of justice and proper disclosure, thirty (30) requests for production for Plaintiff to potentially be served on Chiappa and

thirty (30) requests for production for Chiappa to potentially be served on Plaintiff, are necessary here.

4. Plaintiff and Chiappa stipulate and agree that after the thirty (30) requests for production have been responded to, should either Plaintiff or Chiappa believe that additional requests for production are necessary, Plaintiff and Chiappa may stipulate to such additional requests, and in the absence of a stipulation and/or agreement, any party seeking additional requests for production may seek leave of Court for such additional requests.

SO STIPULATED AND AGREED:

/s/ C. Brian Jarrard

C. Brian Jarrard

GA Bar No. 389497

/s/ John J. Makowski

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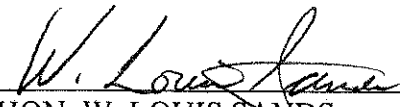
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**Attorneys for Defendant Chiappa
Firearms, USA, Ltd.**

SO ORDERED, this 9th day of December, 2025


HON. W. LOUIS SANDS
UNITED STATES DISTRICT COURT