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2 ANSWER: Irrelevant objection.

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7 3.18 For each and every year from 1930 to present, state  
8 the number of such suits which were served upon you.

9 ANSWER: See response to 3.16. Irrelevant objection.

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15 3.19 Identify by name and address the person or persons  
16 who act as corporate custodian of documents pertaining to the third  
17 party litigation in which asbestos-related damage is alleged.

18 ANSWER: J. E. Mencini.