ANSWER: J. E. Mencini.

3.31 Identify all documents relating to the information kept on worker's compensation claims.

ANSWER: Materials as provided by State of Ohio, Bureau of Workman's Compensation which generally includes claimant's report, on Action index as maintained by the State Bureau, any medical reports filed with the State Bureau and any applications for adjustment of the claim which may be filed by any party to the proceeding. None until 1981 and as to the number of suits after 1981, irrelevant objection.

REQUEST FOR PRODUCTION P: Pursuant to CR 34, attach or produce according to the above instructions a copy of all documents identified in the preceding interrogatory.

RESPONSE: Irrelevant objection—overly broad and burdensome.