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2 ANSWER: See 1.35 above.
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9 REQUEST FOR PRODUCTION I: Pursuant to CR 34, attach or
10 produce according to the above instructions a copy of all documents
11 identified in subparagraph (d) above.

12 RESPONSE: Objection--overly broad and cannot identify documents, if
13 any, which should be produced in response to this Request for
14 Production. J. E. Mencini is aware of state and federal safety and
15 health standards which we assume represent the state of domestic
knowledge. The standards are available to the general public and
production of same is objected to.

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17 1.37 Do you have or have you ever had person(s)
18 responsible for monitoring the state of current foreign knowledge
19 of the safety and health aspects of your industry?
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21 ANSWER: No.
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