

1 RESPONSE: Admitted.
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7 4.12 Was defendant ever involved in a suit or claim by an
8 individual (or a union on behalf of an individual) instituted to
9 gain access to the medical or exposure records of defendant's
10 employees?

11 ANSWER: No.
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16 4.13 If the answer to the foregoing interrogatory is in
17 the affirmative, state:

- 18 (a) When such a suit occurred;
19 (b) The attorneys involved in representing each
20 party, together with the cause number and court
21 where filed;
22 (c) The individual and/or union involved;
23 (d) The nature of the medical records in question;
24 (e) Identify the custodian (by name, address and
25 position) of records relating to the above
26 subject.