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2 ANSWER: Irrelevant objection.
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6 3.18 For each and every year from 1930 to present, state
7 the number of such suits which were served upon you.
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9 ANSWER: See response to 3.16. Irrelevant objection.
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14 3.19 Identify by name and address the person or persons
15 who act as corporate custodian of documents pertaining to the third
16 party litigation in which asbestos-related damage is alleged.
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18 ANSWER: J. E. Mencini.
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