

1 ANSWER: Irrelevant objection.
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7 3.23 For each and every year since 1930 to the present,
8 state the number of such suits which were served upon you.

9 ANSWER: See answer to 3.16, and to years after 1981, irrelevant objection.
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14 3.29 Do you retain records of the worker's compensation or
15 third party claims described in the foregoing interrogatories?
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17 ANSWER: Yes.
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21 3.30 Identify with name and address the corporate
22 custodian of records concerning claims of workers.
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