

RESPONSE: Objection. Defendant objects to this Request as it requires information in violation of the attorney work-product and attorney-client communication privileges. Moreover, this Request is overbroad, vague, unduly burdensome and requests information that is irrelevant in determining whether the defendant is liable to the plaintiff on any of the claims at issue. Further, this Request is unlikely to lead to the discovery of relevant and admissible information.

31. Produce all documents produced by Mr. Nicholas J. D'Andrea, Mr. Ed Earley and Mr. Bob Caridi in any other litigation, where credibility for anyone of them is or was at issue.

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