

1 Service, Health Services and Mental Health Administration, Na-
2 tional Institute for Occupational Safety and Health, 1972.

3 INTERROGATORY NO. 72:

4 Please state when defendant obtained any information con-
5 cerning the likelihood of asbestos being hazardous to one's
6 health. Include in your answer how defendant first obtained this
7 information.

8 RESPONSE:

9 OBJECTION. Interrogatory No. 72 is objected to on the
10 grounds that it is overly broad, vague, ambiguous and unintelli-
11 gible.

12 INTERROGATORY NO. 73:

13 Please state whether or not defendant ever maintained a
14 library or collection of medical information pertaining to ef-
15 fects of asbestos upon human health. If so, please state:

16 (a) The location of said library or collection;

17 (b) The person(s) who maintained it;

18 (c) The bibliography of medical articles, materials,
19 and other reports that are or were a part of said library on said
20 subject, including journals, publications, reports and all memo-
21 randa published and received by defendant since 1930.

22 RESPONSE:

23 OBJECTION. Interrogatory No. 73 is objected to on the
24 grounds that it is overly broad, burdensome, and oppressive and
25 seeks information which is not reasonably calculated to lead to
26 the discovery of admissible evidence. Without waiving said ob-
27 jection, and in the spirit of liberal discovery, defendant will
respond that there are several books in the medical director's