

1 (c) The results of the research or study.

2 RESPONSE TO INTERROGATORY NO. 33:

3 Wagner objects to this Interrogatory on the grounds
4 that it is irrelevant and is not calculated to lead to the dis-
5 covery of admissible evidence. Subject to that objection, Wag-
6 ner states that it conducted no such studies.

7 INTERROGATORY NO. 34:

8 Please state the names, addresses, dates of employment
9 and official title of the defendant's chief medical officers
from 1930 until the present.

10 RESPONSE TO INTERROGATORY NO. 34:

11 Wagner has not employed anyone in the position of
12 chief medical officer.

13 INTERROGATORY NO. 35:

14 Please state the name, address, title and dates of
15 employment of the immediate superior(s) of the individual iden-
tified in the preceding interrogatory.

16 RESPONSE TO INTERROGATORY NO. 35:

17 See Wagner's response to Interrogatory No. 34.

18 INTERROGATORY NO. 36:

19 Please describe in detail the duties and responsibil-
20 ities of the defendant's chief medical officer.

21 RESPONSE TO INTERROGATORY NO. 36:

22 See Wagner's response to interrogatory No. 34.

23 INTERROGATORY NO. 37:

24 Please state the names and addresses of all physicians
25 employed, retained or otherwise engaged by the defendant at any
26 of its facilities from the years of 1930 until the present time.

27

28