

Without waiver of these objections, Abex responds that it maintained a corporate-wide research department. The purpose of this department included designing and developing new products for Abex.

INTERROGATORY NO. 50:

Did Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, maintain a medical and/or scientific library at any time from 1940 to the present? If so:

- (1) State the dates such library existed;
- (2) State the number of volumes maintained therein;
- (3) State the number of employees, part-time or full-time, assigned to the maintenance of said library; and
- (4) Identify the person(s) within the corporate structure to whom said library employees reported throughout the existence of the library.

RESPONSE TO INTERROGATORY NO. 50:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections Abex responds that it did not maintain an official medical library, although its medical department did have various books, articles, and journals relevant to industrial medicine.

INTERROGATORY NO. 51:

Identify any and all scientific or medical periodicals to which defendant, any predecessor