

51. Identify all individuals who are now or have ever been employed by you including their current address who can testify or have testified concerning:

- (a) The history of that portion of your organization responsible for preventive medicine or occupational hygiene;
- (b) Your company medical policy, practices, and procedures;
- (c) The history of that portion of your organization responsible for product safety;
- (d) The nature and extent of your knowledge, over time, of health hazards actually, allegedly, or possibly associated with exposure to asbestos or asbestos products;
- (e) Actions taken by you to warn, direct or indirect purchasers of asbestos products or protect their employees of health hazards;
- (f) Actions taken to warn or protect persons such as plaintiff and spouse against hazards of asbestos.

**ANSWER TO INTERROGATORY NO. 51:** Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.

52. Did or does defendant maintain a medical library?  
If yes, state:

- (a) Date established;
- (b) location;
- (c) Names and addresses of librarians;
- (d) Title, author, and publisher of all journals and books bought or subscribed to during the period 1930 through 1978;
- (e) To whom journals in the area of asbestos, industrial hygiene, medicine safety or engineering were distributed.