

1 OBJECTION. Defendant refers the plaintiff to the objection
2 set forth in Response to Interrogatory No. 40, supra, and incor-
3 porates the same by reference herein as though fully set forth.
4 Without waiving said objection and, in the spirit of liberal
5 discovery, defendant responds that it appears that in or about
6 1936, American Brake Shoe and Foundry Company agreed to contribute
7 monies to a study to be conducted by Dr. LeRoy Gardner at Saranac
8 Laboratory, Saranac Lake, New York, and in 1937, American
9 Brake Shoe and Foundry Company committed \$250 per annum for three
10 years by way of contribution.

11 INTERROGATORY NO. 44:

12 Please state whether the defendant had a department, divi-
13 sion or section devoted to scientific and/or medical research
14 during the period from 1930 until the present time.

15 RESPONSE:

16 OBJECTION. Interrogatory No. 44 is objected to on the
17 grounds that it is overly broad, vague, ambiguous and unintelli-
18 gible. Without waiving said objection and, in the spirit of
19 liberal discovery, this defendant will respond that it did not
20 have a department, division or section specifically devoted to
21 medical research during the indicated time period.

22 INTERROGATORY NO. 45:

23 Please state the scientific or medical periodicals to which
24 the defendant, its medical department or industrial hygiene divi-
25 sion subscribed during the period between 1930 and 1972 specify-
26 ing the date said subscriptions were begun.

27 RESPONSE:

OBJECTION. Defendant refers the plaintiff to the objection