

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:

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

ANSWER:

Warner Electric Brake & Clutch Company did not have a "medical department." Warner Electric Brake & Clutch Company did not have a medical "library." See Answer to Interrogatory No. 47, which is incorporated herein as if fully rewritten. The nurse at the Roscoe facility kept several medical books relating to a broad range of potential workplace injuries. She was employed at the Roscoe facility from approximately 1968 until 2003. Warner Electric Brake & Clutch Company did not have a "scientific library." Warner Electric Brake & Clutch Company engineers kept, for a time, journals, papers and other information regarding a variety of engineering topics at the S. Beloit facility.

INTERROGATORY NO. 51:

Identify any and all scientific or medical periodicals to which Defendant, any predecessor or any related company, or any medical department or industrial hygiene division thereof, subscribed from 1940 to the present, and for each periodical state the dates of such subscriptions.