

"can testify" with regard to various topics, however, Abex cannot determine from this question which person or persons it should identify.

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.

ANSWER: 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.

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