

Abex employees, it is objected to on the grounds that such information lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Abex further objects to this interrogatory on the grounds that it fails to distinguish among the different types of raw asbestos fibers, asbestos-containing building products and asbestos-containing automotive friction products. Subject to and without waiving these objections, Abex does not precisely know when it first became aware of any TLV's for asbestos.

28. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- (a) The date each such library was established;
- (b) The location of each library;
- (c) The name(s) of the librarian(s) since 1930;
- (d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- (e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

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. Subject to and without waiving these objections, Abex did not maintain an official medical library, although its medical department did have various books and publications relevant to industrial medicine.

29. Did Defendant in the 1920's or 1930's commission, or participate in the arrangements with Metropolitan Life Insurance