

lobbying, engineering, associations and research foundations or organizations you have been a member of since 1939 indicating:

- a. the date your first joined;
- b. the date, if any, your membership terminated;
- c. the names of your employees who attended meetings and the dates and designations of such meetings;
- d. the identity, location, and custodian of all documents including periodicals, reports, receipts for membership fees, meeting agendas, meeting handouts, papers, trip reports, notes, correspondence, memos and any other documents relating to said organizations and meetings.

ANSWER TO INTERROGATORY NO. 30: Because plaintiff has failed to identify exposure to any asbestos-containing products of this defendant, this interrogatory is objected to on the grounds that it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. All other grounds for objection are reserved pending possible future product identification.

31. Do you maintain a library dealing with industrial hygiene, medicine, safety and/or engineering? If so, state:

- a. the date you established the library;
- b. the location of the library;
- c. the name or names of the librarian(s) since 1939;
- d. the identity of all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety and/or engineering.
- e. the identity of all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER TO INTERROGATORY NO. 31: No.