

relevant to industrial medicine. Abex is aware that it received the American Industrial Hygiene Association Journal and the Journal of Occupational Medicine, Occupational Health and Safety.

Any such books, articles, and journals, if they exist, are currently maintained at Abex's facility in Brooklyn, New York.

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.

SECOND AMENDED ANSWER TO INTERROGATORY NO. 51:

See Objections and Answer to Interrogatory No. 50, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 52: Has Defendant, any predecessor or any related company, at any time since 1940:

- (a) been a member of a medical and/or scientific library or library association?
- (b) been a member of any organization or association which maintained a medical and/or scientific library?
- (c) been a member of any organization or association through which members obtained the use of, or access to, a medical and/or scientific library?

SECOND AMENDED ANSWER TO INTERROGATORY NO. 52:

See Objections and Answer to Interrogatory No. 50, which are incorporated by reference as though set forth herein in full.

INTERROGATORY NO. 53: If your answer to any subpart of Interrogatory No. 52 is "Yes,":

- (a) Identify the library(ies) involved and state the years during which Defendant, its predecessor or related company was a member of, or otherwise had use of or access to said library; and
- (b) If applicable, identify the organization or association through which Defendant, its predecessor or related company, obtained the use of or access to, such library(ies).