

such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER: To the best of current knowledge, no Abex medical director or industrial hygienist made any recommendations concerning exposure by end users of Abex's friction products.

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

- Has library been checked?*
- (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 did not maintain an official medical library, although its medical department did have various books and publications relevant to industrial medicine. Abex is aware that it received the American Industrial Hygiene Association Journal; Journal of Occupational Medicine; Occupational Health and Safety; Industrial Medicine, March 1944, and The Journal of the American Medical Association, April 2, 1949. Abex further states the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. Some of the documents and records are organized by subject matter. Discovery is continuing. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained