ANSWER:

Objection: it is not relevant to this Defendant to inquire about periodicals to which Warner Electric subscribes today. Subject to and without waiving objections, *see* Answers to Interrogatory Nos. 47-50. Defendant does not believe that Warner Electric Brake & Clutch Company subscribed to medical periodicals except perhaps those used by the nurse. Defendant currently is unaware of scientific periodicals, if any, that Warner Electric Brake & Clutch Company subscribed to years ago.

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?

ANSWER:

Further objecting, it is not relevant to inquire about periodicals to which Warner Electric subscribes today. Subject to and without waiving objections, see Answers to Interrogatory Nos. 47-51, which are incorporated herein as if fully rewritten. Defendant currently is unaware of the answer to the questions asked in this interrogatory.

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