

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.

RESPONSE TO INTERROGATORY NO. 51:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of these objections, Abex responds that it is aware that it received the American Industrial Hygiene Association Journal and the Journal of Occupation Medicine, Occupational Health and Safety.

INTERROGATORY NO. 52:

Has Defendant, any predecessor or any related company, at any time since 1940:

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

RESPONSE TO INTERROGATORY NO. 51:

See General Objections. Abex further objects to this request on the grounds that it is compound, vague, ambiguous, overly broad as to time and scope, unduly burdensome, irrelevant to any issue in this action and not reasonably calculated to lead to the discovery of admissible evidence.

Abex further objects to this interrogatory on the grounds that it is over broad, oppressive,