

- a) A list of each such claim by claimant's name, date filed, the caption and jurisdiction involved;
- b) The disease alleged in each such claim;
- c) A brief summary of the disposition of each such claim; and
- d) The name, address and job classification of the person or persons having custody of the records pertaining to each such claim.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to this interrogatory on the ground that it is overly broad, unduly burdensome, and seeks information that is irrelevant and immaterial to these proceedings and that is not reasonably calculated to lead to the discovery of relevant, material or admissible evidence. In addition, the attorney client privilege and work product doctrine may be applicable.

By way of further response, without waiving its objections, upon information and belief, based on the review of these records, Westinghouse responds no.

48. Did Defendant receive notice prior to 1968 that any person was claiming injury as a result of using asbestos products manufactured, sold, installed, an/or distributed by Defendant? If so, please state:

- a) The name and address of each claimant;
- b) The date of notice of each claim;
- c) A description of the claim;
- d) The type of injuries allegedly sustained;
- e) The name and address of each attorney representing the individuals making such claims;
- f) The style and court number of each such claim;
- g) The resolution of each claim.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to this interrogatory on the grounds that it is overly broad, burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and seeks information protected by the attorney/client privilege and the attorney work product doctrine.