

given off respirable asbestos fibers in his or her presence, Westinghouse will endeavor to answer this Interrogatory for such product(s), if any, to the extent Westinghouse reasonably can do so.

51. As to ARMCO/A.K. Steel Middletown Plant and/or ARMCO/A.K. Steel Hamilton Plant, and as to each Plaintiff/Decedent, please state whether Defendant contends that there was any substance other than asbestos which contributed or caused Plaintiff/Decedent's injuries. If your answer is yes, please state the following:

- a) The facts upon which you rely;
- b) The identity of the sources upon which you rely which substantiate these facts.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Without waiving these objections, Westinghouse states that its investigation and its discovery are ongoing. At such time as Westinghouse has obtained information regarding other sources of Plaintiffs' injuries, Westinghouse will supplement this response.

52. Would any respirator, mask or other breathing devices prevent inhalation of the asbestos dust and fibers contained in products listed in answer to Interrogatory No. 5? If so, state:

- a) When the respirator was sold;
- b) A detailed description of such respirator or other breathing devices, including name of manufacturer and model number;
- c) The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers;
- d) Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author and number;
- e) List all documents which mention, allude or refer to tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.