

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to responding to this Interrogatory concerning any products not alleged to have contributed to the alleged injuries of plaintiff(s), on the grounds that the Interrogatory, as applied to Westinghouse, is overly broad and unduly burdensome and seeks information which is irrelevant and immaterial to these proceedings and is not reasonably calculated to lead to the discovery of admissible evidence. If a particular plaintiff will specifically and credibly identify the Westinghouse product(s) alleged to have 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.

45. Does Defendant contend that asbestos-containing products can be manufactured so as to eliminate all potential health hazards to persons working with or around, installing or applying same? If so, please state the following:

- a) The date that Defendant first determined that another product could be used in place of asbestos;
- b) The chemical of the substitute;
- c) Whether the substitute is suitable for the purpose for which they are to be used;
- d) Whether Defendant used the substitute for asbestos to 1971;
- e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse further objects to this interrogatory as to products not claimed to have contributed to the alleged injuries of the plaintiffs. Westinghouse also objects to this interrogatory on the grounds that it calls for medical and scientific opinions, which Westinghouse is not competent to render.

Without waiving these objections, Westinghouse contends that some asbestos-containing products can be safe depending upon their low potential, if any, to release loose, friable fibers, or because the asbestos ingredient in them does not become airborne due to its location and how the product is used.