

containing wire and cable products manufactured by others. In addition, the Hampton Micarta facility was listed as a subsidiary of Westinghouse when purchased in 1954. However, it soon became a part of the Micarta Division of Westinghouse. As a subsidiary it was known as Plywood-Plastics Corporation of Hampton, South Carolina. Also, in 1968 Westinghouse purchased its West Mifflin Pennsylvania Micarta Production facility from TRW. Although West Mifflin became part of the Insulating Materials division, for a period of time it operated as a subsidiary under the name Electro Insulation. Westinghouse is unaware of any other subsidiary which, while owned by Westinghouse, sold asbestos-containing products as a regular part of its business. However, given the difficulties set forth in the General Objection above, Westinghouse cannot conclusively foreclose the possibility that such subsidiaries may have existed in the past.

However, Westinghouse may have from time to time owned non-controlling security or ownership interests in various entities which have had some involvement with asbestos. For example, Westinghouse has from time to time had funds invested in U.S. Government securities and it is aware, through its attorneys, that the U.S. Government has on occasions in the past sold, supplied, distributed or otherwise placed asbestos-containing products in the stream of commerce through sales of surplus asbestos stocks or otherwise. Westinghouse is unable at this time to state with certainty every interest it ever owned in any entity that may have had some involvement with asbestos, and on that ground objects to any further answer to this interrogatory.

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, or Defendant's subsidiary);
- b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
 - 1) The trade or brand name.
 - 2) Its identification number (model, serial number, etc.).
 - 3) The time period it was manufactured, mined, marketed, distributed or sold.
 - 4) Its physical description including color, general composition, and form.
 - 5) A detailed description of its intended use and purpose.
 - 6) A detailed description of the type package in which it was sold, listing the dates of each type of package used, a physical description of the package,