IN THE CIRCUIT COURT
FOR THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

In re: All Asbestos Litigation in Madison County

WESTINGHOUSE ELECTRIC CORPORATION'S SECOND SUPPLEMENTAL RESPONSE TO PLAINTIFFS' INTERROGATORY NUMBERS 7 AND 8 AND NOTICE OF COMPLIANCE

Westinghouse Electric Corporation ("Westinghouse"), by counsel, files this Second Supplemental Response to plaintiff's Interrogatory Numbers 7 and 8 in compliance with paragraph 4 of the Court's Order of October 29, 1987, and paragraph 13 of the Court's Order of November 17, 1987.

INTERROGATORY NO. 7: As to any product containing asbestos in any form, has this defendant, or any predecessor(s):

(a) Ever designed such a product?

(b) Manufactured such a product?

(c) Processed such a product?

(d) Sold such a product?

(e) Distributed such a product?

(f) Patented such a product?

(g) Relabeled such a product which was manufactured, sold or distributed by another company?

ANSWER: Westinghouse believes that the answer to Interrogatory No. 7(a), (b), (c), (d), and (e) is yes and investigation is continuing as to No. 7(f) and (g).



INTERROGATORY NO. 8: If your answer to No 7(b), 7(d) and 7(e) is "Yes", then give the trade name of the product, the year the defendant or predecessor first sold or distributed such product, and the year the defendant last sold or distributed such product.

ANSWER: During the time periods relevant to this litigation, Westinghouse manufactured and sold asbestos-containing products. Westinghouse also sold and distributed asbestos-containing products manufactured by other companies. In addition, Westinghouse manufactured, sold and distributed Westinghouse products which incorporated asbestos-containing components manufactured by other entities.

The following is a list of asbestos-containing products[1] that Westinghouse reasonably believes that it manufactured, sold or distributed during the relevant time periods:

air conditioners and compressors
arc chute on DHP breaker assembly
armatures
brakes for motors, bridge hoists, cranes and other industrial equipment, and linings
breakers
bus ways
capacitor-start capacitor-run motors
capacitor-start split phase motors
cement insulating material, BT-4105
circuit breakers
condensers
control equipment
control rod drive mechanisms
control items such as relays, contactors, overload relays, overhead controls, and control assemblies
CPL arrester
CRC test press

[1]Not all variations of these general product descriptions contained asbestos.

DC armatures for motors
DC contactor
electrical tape
electronic tubes
elevators
epoxy resin insulating material, B7-365
escalators
fans
flexible laminate
floodlights, aviation lights and light fixtures
fluorescent lights
fractional horse motors
gaskets
gas-pak gas heat electric cool air conditioner units (500)
generators
governors
heat transfer products
heating coils
high voltage incandescent lamp, 230V
immersible transducers
induction heating equipment and systems
JF autostarter
lighting arresters
magnetic controller
magnetic relay
mercury lamp
mercury vapor rectifier
micarta plate and tube
molded line traps
molded parts for electrical equipment, including:
    spacer barrier
    mounting or terminal blocks
    arc boxes and shields
    electrical insulator sleeve
    plug board
    barrier support
    coil shield
motors and motor insulating materials
moveable wall panels
network protectors
outdoor switches with heating elements
oxygen analyzer probe assembly
oxygen shield
power reclosures
protective relays
pumps and packing
range timer
reductor gears
safety switches
shaft seal main loop circulating pumps
single phase brake motors
sleeving
split-phase motors
SVS arrester

steam & gas turbines and ancillary insulating materials
switchgears
tape
thermal demand meter
traction motors
transducers
transformers
treated and untreated fabric and paper
valves and packing
varnish treated insulating material for electrical equipment
welding electrodes
welding machines
wire wound resistor assembly

Westinghouse also believes it may have distributed, through Westinghouse Electric Supply Company ("WESCO"), a Westinghouse division, asbestos-containing products manufactured by Westinghouse and other companies. The following is a list of asbestos-containing products of other companies that were advertised for sale through WESCO catalogs, and available for sale through various WESCO offices.

American Beauty Heater Cord
Armored Thermostat Cable
Asbestos Insulated Heat-resisting Fixture Cord, type AF
Asbestos Insulated Wire and Cable
Asbestos Ranger and Rheostat Wire "Rockbestos"
Collyer Asbestos Heater Cord
General Cable Asbestos Insulated Fixture Wire
General Cable Asbestos Insulated Flexible Cord
Heater Cord Type HPD
Rockbestos Asbestos Varnished Cambric Wire, Types ABC and AVP
Rockbestos Asbestos-covered Nickel Cord
Rockbestos AVC Boiler Room Wire and Cable
Rockbestos AVC Switchboard Wire
Rockbestos Heating Resisting Fixture Wire
Rockbestos Power Cable
Rockbestos Stove Wire
Rockbestos Table LH Hotbed or Industrial Heating Cable
Thermostat Cable

There may be other asbestos-containing products manufactured by companies other than Westinghouse that local WESCO offices distributed that are not included in the catalogs and,

consequently, are not on this list. Furthermore, there may have been additional asbestos-containing products that were advertised for sale in the WESCO catalogs, but which Westinghouse is unable to identify as having contained asbestos based upon the limited product descriptions in the catalogs. Accordingly, these catalogs are being made available to plaintiffs for inspection, upon reasonable notice.

Westinghouse has been unable to locate catalogs for certain years. Consequently, there may have been asbestos-containing products manufactured by companies other than Westinghouse which Westinghouse is unable to identify and list for those years.

Westinghouse also supplements this response by incorporating by reference any other asbestos-containing products not identified in the lists above which may have been manufactured, sold or distributed to plaintiffs' employers as reflected in purchase orders, purchase invoices, or other sales-related documents within the possession of plaintiffs' counsel and plaintiffs' employers, but which Westinghouse has not yet determined to have contained asbestos.

The information contained in this pleading is based on the results of a reasonable, good faith investigation of available records and interviews with current and former Westinghouse employees. Accordingly, Westinghouse will supplement this response if any additional information is obtained through continued investigation.

Respectfully submitted,

WESTINGHOUSE ELECTRIC CORPORATION

By: See Affidavit Attached

Counsel:

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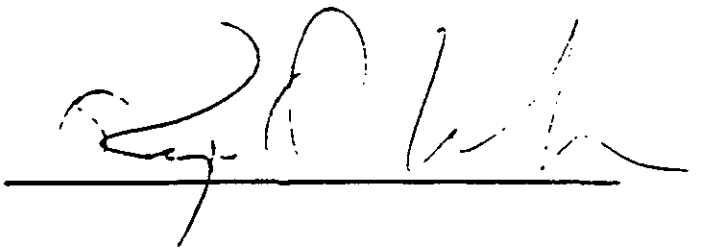
CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Westinghouse Electric Corporation's Second Supplemental Response to Plaintiffs' Interrogatory Numbers 7 and 8 and Notice of Compliance was mailed to all counsel of record for the parties and the respondent employers this 15th day of December, 1987.



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COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

Before me, the undersigned authority, a Notary Public in and for said Commonwealth and County, personally appeared R. E. PETERS, who, being duly sworn, deposes and says that he is ASSISTANT SECRETARY of WESTINGHOUSE ELECTRIC CORPORATION; that he is authorized to make this Affidavit for and on its behalf; and that the statements contained in the foregoing ANSWERS TO INTERROGATORIES are true and correct to the best of his knowledge, information and belief.

R E Peters
R. E. PETERS
Assistant Secretary

SWORN TO and subscribed
before me this 4th day
of December, 1987.

Rebecca S. Tate
Notary Public

REBECCA S. TATE, NOTARY PUBLIC
PITTSBURGH, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCT. 28, 1991
Member, Pennsylvania Association of Notaries