

LABCO of Louisiana, Inc., 10/12/1983 until 2/13/1987
Moorehead Machinery & Boiler Company,
5/2/1983 until 2/13/1987
Process Mechanical, Inc., 5/2/1983 until 2/13/1987
O'Conner Combustor Company, 1983 until 1990

During the years Westinghouse had an interest in the above-listed companies, they were engaged in activities including boiler maintenance and service; construction and erection of interlocking fiberglass insulated aluminum panels; heater blanket construction and service; electrical product purchasing and supply; and rotating kiln incinerator construction and erection.

Westinghouse has no present knowledge or information that suggests any of the above-listed entities installed or supplied asbestos-containing products on the furnaces, pipes, boilers, or turbines at any site listed in this Interrogatory during the periods of time the companies were affiliated with Westinghouse. Westinghouse objects and is unable to respond to this Interrogatory to the extent it applies to periods of time during which Westinghouse neither owned nor operated the companies, and to which it calls for information that is not within Westinghouse's direct knowledge or control.

11. Did Defendant ever have any division or subsidiary engaged in the contract business of applying asbestos-containing refractory? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business.

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.