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IN RE: ALL ASBESTOS-RELATED PERSONAL	§	IN THE DISTRICT COURT
INJURY OR DEATH CASES FILED	§	
BY BARON & BUDD, P.C. OR TO	§	DALLAS COUNTY, TEXAS
BE FILED BY BARON & BUDD, P.C.	§	
IN DALLAS COUNTY, TEXAS	§	191ST JUDICIAL DISTRICT

**WESTINGHOUSE ELECTRIC CORPORATION'S OBJECTIONS
AND RESPONSES TO PLAINTIFFS' INTERROGATORIES MAILED TO
DEFENDANT ON OR ABOUT SEPTEMBER 9, 1993**

TO: Plaintiffs, by and through their counsel of record, Russell W. Budd, Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.

Comes now Westinghouse Electric Corporation ("Westinghouse"), by and through its attorneys of record, and files these Objections and Responses to Plaintiffs' Interrogatories Mailed to Defendant on or about September 9, 1993.



Respectfully submitted,

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By: 
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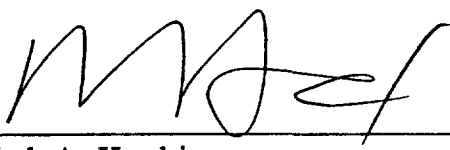
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ATTORNEYS FOR WESTINGHOUSE
ELECTRIC CORPORATION

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Westinghouse Electric Corporation's Objections and Responses to Plaintiffs' Interrogatories mailed to Defendant on or about September 9, 1993 have been forwarded to counsel for Plaintiffs via hand delivery and to all other known counsel of record via U.S. Mail, regular delivery, on this the 11th day of October, 1993.


Mark A. Hendrix
ATTORNEYS FOR DEFENDANT

**WESTINGHOUSE ELECTRIC CORPORATION'S OBJECTIONS
AND RESPONSES TO PLAINTIFFS' INTERROGATORIES
MAILED TO DEFENDANT ON OR ABOUT SEPTEMBER 9, 1993 - Page 2**

Preliminary Statement and General Objections

Westinghouse has a history of cooperation with plaintiffs' counsel, Baron & Budd, and has produced substantial discovery consisting of documents, witnesses and answers to interrogatories. The current interrogatories request verification of the authenticity of certain documents which presumably were previously produced by Westinghouse to Plaintiffs along with literally thousands of other documents. However, these documents were not prepared by Westinghouse and Westinghouse cannot attest to their authenticity. Specifically, since these documents consist of a collection of articles published in the Industrial Hygiene Digest, Westinghouse lacks the first hand knowledge necessary to determine whether each of these documents is genuine and authentic. Furthermore, many of the documents themselves are unintelligible due to the copy quality or contain unreadable bates numbers. Finally, some of these digests do not contain an index of articles and Westinghouse cannot confirm whether a complete copy of the digest or even a complete copy of each article is enclosed. In essence, Plaintiffs have failed to provide sufficient information for Westinghouse to provide accurate and meaningful responses.

Westinghouse's responses to these Interrogatories are made without in any way waiving: (1) the right to object, on the grounds of competency, relevancy, materiality, hearsay or any other proper grounds, to the use of any such information for any purpose, in whole or in part, in any subsequent stage or proceeding in this action or any other action; or (2) the right to object on any and all grounds, at any time, to any other discovery procedure relating to the subject matter of these Interrogatories.

Without waiving these objections and subject thereto Westinghouse further responds to the Interrogatories as follows:

INTERROGATORIES

INTERROGATORY NO. 1: For each document listed below, please answer whether such document is a true and correct duplicate of a genuine and authentic document:

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
a)	WH-581 <u>Industrial Hygiene Digest</u> , February 1937.
b)	WH-582 <u>Industrial Hygiene Digest</u> , April 1937.
c)	WH-583 <u>Industrial Hygiene Digest</u> , May 1937.
d)	WH-584 <u>Industrial Hygiene Digest</u> , June 1, 1937.
e)	WH-585 <u>Industrial Hygiene Digest</u> , September 1, 1937.
f)	WH-586 <u>Industrial Hygiene Digest</u> , October 1, 1937.
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i)	WH-589	<u>Industrial Hygiene Digest</u> , February 10, 1938.
j)	WH-590	<u>Industrial Hygiene Digest</u> , March 10, 1938.
k)	WH-591	<u>Industrial Hygiene Digest</u> , May 1, 1938.
l)	WH-592	<u>Industrial Hygiene Digest</u> , June 14, 1938.
m)	WH-593	<u>Industrial Hygiene Digest</u> , September 7, 1938.
n)	WH-594	<u>Industrial Hygiene Digest</u> , October 1938.
o)	WH-595	<u>Industrial Hygiene Digest</u> , November 1938.
p)	WH-596	<u>Industrial Hygiene Digest</u> , December 1938.
q)	WH-597	<u>Industrial Hygiene Digest</u> , January 24, 1939.
r)	WH-598	<u>Industrial Hygiene Digest</u> , February 24, 1939.
s)	WH-599	<u>Industrial Hygiene Digest</u> , March 23, 1939.
t)	WH-600	<u>Industrial Hygiene Digest</u> , April 22, 1939.
u)	WH-601	<u>Industrial Hygiene Digest</u> , May 5, 1939.
v)	WH-602	<u>Industrial Hygiene Digest</u> , September 13, 1939.
w)	WH-603	<u>Industrial Hygiene Digest</u> , October 17, 1939.
x)	WH-604	<u>Industrial Hygiene Digest</u> , November 22, 1939.
y)	WH-605	<u>Industrial Hygiene Digest</u> , November 28, 1939.
z)	WH-606	<u>Industrial Hygiene Digest</u> , January 17, 1940.
aa)	WH-607	<u>Industrial Hygiene Digest</u> , February 23, 1940.
bb)	WH-608	<u>Industrial Hygiene Digest</u> , March 18, 1940.
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gg)	WH-613	<u>Industrial Hygiene Digest</u> , April 1941.
hh)	WH-614	<u>Industrial Hygiene Digest</u> , June 1941.
ii)	WH-615	<u>Industrial Hygiene Digest</u> , July 1941.
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kk)	WH-617	<u>Industrial Hygiene Digest</u> , October 1941.
ll)	WH-618	<u>Industrial Hygiene Digest</u> , April 1942.
mm)	WH-619	<u>Industrial Hygiene Digest</u> , September 1942.
nn)	WH-620	<u>Industrial Hygiene Digest</u> , May 1943.
oo)	WH-621	<u>Industrial Hygiene Digest</u> , July 1943.
pp)	WH-622	<u>Industrial Hygiene Digest</u> , January 1944.
qq)	WH-623	<u>Industrial Hygiene Digest</u> , February 1944.
rr)	WH-624	<u>Industrial Hygiene Digest</u> , March 1944.
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vv)	WH-628	<u>Industrial Hygiene Digest</u> , December 1945.
ww)	WH-629	<u>Industrial Hygiene Digest</u> , February 1947.
xx)	WH-630	<u>Industrial Hygiene Digest</u> , March 1947.
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iii)	WH-641	<u>Industrial Hygiene Digest</u> , October 1951.
jjj)	WH-642	<u>Industrial Hygiene Digest</u> , February 1952.
kkk)	WH-643	<u>Industrial Hygiene Digest</u> , April 1952.
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qqq)	WH-649	<u>Industrial Hygiene Digest</u> , March 1954.
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xxx)	WH-656	<u>Industrial Hygiene Digest</u> , July 1956.
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ffff)	WH-664	<u>Industrial Hygiene Digest</u> , April 1960.
gggg)	WH-665	<u>Industrial Hygiene Digest</u> , August 1960.
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iiii)	WH-667	<u>Industrial Hygiene Digest</u> , November 1960.
jjjj)	WH-668	<u>Industrial Hygiene Digest</u> , January 1961.
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nnnn)	WH-672	<u>Industrial Hygiene Digest</u> , August 1961.
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pppp)	WH-674	<u>Industrial Hygiene Digest</u> , November 1961.
qqqq)	WH-675	<u>Industrial Hygiene Digest</u> , February 1962.
rrrr)	WH-676	<u>Industrial Hygiene Digest</u> , June 1962.

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yyyyy)	WH-709	<u>Industrial Hygiene Digest</u> , September 1967.
zzzzz)	WH-710	<u>Industrial Hygiene Digest</u> , October 1967.
aaaaaa)	WH-711	<u>Industrial Hygiene Digest</u> , November 1967.
bbbbbb)	WH-712	<u>Industrial Hygiene Digest</u> , December 1967.

ANSWER: See general objection. Without waiving its objection, Westinghouse states that the above-referenced documents are true and correct copies of documents maintained in Westinghouse's files, except insofar as they may contain exhibit stickers, handwriting, marginalia and/or other marks not found on the original documents.

Westinghouse lacks firsthand knowledge necessary to determine whether each of these documents is genuine and authentic. Westinghouse maintains general reference materials and technical libraries throughout the corporation, which may include various industrial periodicals, occupational health and medicine periodicals and other topical reference materials.

Westinghouse has not identified any information which indicates when various publications, including those of the Industrial Hygiene Foundation, were initially received. However, Westinghouse states that as a member of the National Safety Council, Industrial Health Foundation and American Industrial Hygiene Foundation, Westinghouse would have received the publications of those organizations which were routinely distributed to members of those organizations. The information sought regarding the referenced publications, including whether those documents were genuine and authentic when distributed to Westinghouse, should be sought from the organizations themselves and not from Westinghouse.

INTERROGATORY NO. 2: For each document listed below, please answer whether such document was kept and/or generated in the regular course of a regularly conducted business activity of any Westinghouse Entity by an employee or representative of any Westinghouse Entity with knowledge of the act, event, condition or opinion recorded.

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wwwww)	WH-707	<u>Industrial Hygiene Digest</u> , June 1967.
xxxxx)	WH-708	<u>Industrial Hygiene Digest</u> , August 1967.
yyyyy)	WH-709	<u>Industrial Hygiene Digest</u> , September 1967.
zzzzz)	WH-710	<u>Industrial Hygiene Digest</u> , October 1967.
aaaaa)	WH-711	<u>Industrial Hygiene Digest</u> , November 1967.
bbbbb)	WH-712	<u>Industrial Hygiene Digest</u> , December 1967.

ANSWER: See general objection and objection and response to Interrogatory No. 1.

Westinghouse further objects to the argumentative nature of this interrogatory in that it assumes that a Westinghouse employee or representative had "knowledge of the act, event, condition or opinion recorded" in each of these documents.

In addition, the quoted statement is vague and ambiguous on its face and overly broad in scope. Westinghouse objects to reviewing its records to identify organizations to which its employees (past or present) may have belonged, or the publications they may have received from those organizations, over the years. Furthermore, there is no central repository of such information. Individual Westinghouse health and safety professional employees have belonged to various professional, trade, industrial and safety, hygiene or health organizations and research foundations or organizations, such as the American Industrial Hygiene Association, Health Physics Society, and the Society of Safety Engineers. Westinghouse records do not include the dates individual memberships were commenced or terminated and who, if anyone, attended meetings or received publications.

Without waiving its objections, Westinghouse states that the above-referenced documents were received by a Westinghouse employee/representative in the course of his or her employment. Furthermore, these documents appear to be copies of documents produced to Plaintiffs' counsel during one of many previous document productions.

INTERROGATORY NO. 3: For each document listed below, please answer whether such document was found in your files in such a condition as to create no suspicion concerning its authenticity.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
a)	WH-581
b)	WH-582
c)	WH-583
d)	WH-584
e)	WH-585
f)	WH-586
	<u>Industrial Hygiene Digest, February 1937.</u>
	<u>Industrial Hygiene Digest, April 1937.</u>
	<u>Industrial Hygiene Digest, May 1937.</u>
	<u>Industrial Hygiene Digest, June I, 1937.</u>
	<u>Industrial Hygiene Digest, September 1, 1937.</u>
	<u>Industrial Hygiene Digest, October 1, 1937.</u>

g)	WH-587	<u>Industrial Hygiene Digest</u> , December 10, 1937.
h)	WH-588	<u>Industrial Hygiene Digest</u> , January 10, 1938.
i)	WH-589	<u>Industrial Hygiene Digest</u> , February 10, 1938.
j)	WH-590	<u>Industrial Hygiene Digest</u> , March 10, 1938.
k)	WH-591	<u>Industrial Hygiene Digest</u> , May 1, 1938.
l)	WH-592	<u>Industrial Hygiene Digest</u> , June 14, 1938.
m)	WH-593	<u>Industrial Hygiene Digest</u> , September 7, 1938.
n)	WH-594	<u>Industrial Hygiene Digest</u> , October 1938.
o)	WH-595	<u>Industrial Hygiene Digest</u> , November 1938.
p)	WH-596	<u>Industrial Hygiene Digest</u> , December 1938.
q)	WH-597	<u>Industrial Hygiene Digest</u> , January 24, 1939.
r)	WH-598	<u>Industrial Hygiene Digest</u> , February 24, 1939.
s)	WH-599	<u>Industrial Hygiene Digest</u> , March 23, 1939.
t)	WH-600	<u>Industrial Hygiene Digest</u> , April 22, 1939.
u)	WH-601	<u>Industrial Hygiene Digest</u> , May 5, 1939.
v)	WH-602	<u>Industrial Hygiene Digest</u> , September 13, 1939.
w)	WH-603	<u>Industrial Hygiene Digest</u> , October 17, 1939.
x)	WH-604	<u>Industrial Hygiene Digest</u> , November 22, 1939.
y)	WH-605	<u>Industrial Hygiene Digest</u> , November 28, 1939.
z)	WH-606	<u>Industrial Hygiene Digest</u> , January 17, 1940.
aa)	WH-607	<u>Industrial Hygiene Digest</u> , February 23, 1940.
bb)	WH-608	<u>Industrial Hygiene Digest</u> , March 18, 1940.
cc)	WH-609	<u>Industrial Hygiene Digest</u> , April 1940.
dd)	WH-610	<u>Industrial Hygiene Digest</u> , June 1940.
ee)	WH-611	<u>Industrial Hygiene Digest</u> , July 1940.
ff)	WH-612	<u>Industrial Hygiene Digest</u> , October 1940.
gg)	WH-613	<u>Industrial Hygiene Digest</u> , April 1941.
hh)	WH-614	<u>Industrial Hygiene Digest</u> , June 1941.
ii)	WH-615	<u>Industrial Hygiene Digest</u> , July 1941.
j:)	WH-616	<u>Industrial Hygiene Digest</u> , September 1941.
kk)	WH-617	<u>Industrial Hygiene Digest</u> , October 1941.
ll)	WH-618	<u>Industrial Hygiene Digest</u> , April 1942.
mm)	WH-619	<u>Industrial Hygiene Digest</u> , September 1942.
nn)	WH-620	<u>Industrial Hygiene Digest</u> , May 1943.
oo)	WH-621	<u>Industrial Hygiene Digest</u> , July 1943.
pp)	WH-622	<u>Industrial Hygiene Digest</u> , January 1944.
qq)	WH-623	<u>Industrial Hygiene Digest</u> , February 1944.
rr)	WH-624	<u>Industrial Hygiene Digest</u> , March 1944.
ss)	WH-625	<u>Industrial Hygiene Digest</u> , November 1944.
tt)	WH-626	<u>Industrial Hygiene Digest</u> , January 1945.
uu)	WH-627	<u>Industrial Hygiene Digest</u> , March 1945.
vv)	WH-628	<u>Industrial Hygiene Digest</u> , December 1945.
ww)	WH-629	<u>Industrial Hygiene Digest</u> , February 1947.
xx)	WH-630	<u>Industrial Hygiene Digest</u> , March 1947.

yy)	WH-631	<u>Industrial Hygiene Digest</u> , April 1947.
zz)	WH-632	<u>Industrial Hygiene Digest</u> , September 1947.
aaa)	WH-633	<u>Industrial Hygiene Digest</u> , January 1948.
bbb)	WH-634	<u>Industrial Hygiene Digest</u> , February 1948.
ccc)	WH-635	<u>Industrial Hygiene Digest</u> , August 1948.
ddd)	WH-636	<u>Industrial Hygiene Digest</u> , September 1950.
eee)	WH-637	<u>Industrial Hygiene Digest</u> , October 1950.
fff)	WH-638	<u>Industrial Hygiene Digest</u> , January 1951.
ggg)	WH-639	<u>Industrial Hygiene Digest</u> , February 1951.
hhh)	WH-640	<u>Industrial Hygiene Digest</u> , June 1951.
iii)	WH-641	<u>Industrial Hygiene Digest</u> , October 1951.
jjj)	WH-642	<u>Industrial Hygiene Digest</u> , February 1952.
kkk)	WH-643	<u>Industrial Hygiene Digest</u> , April 1952.
lll)	WH-644	<u>Industrial Hygiene Digest</u> , June 1952.
mmm)	WH-645	<u>Industrial Hygiene Digest</u> , September 1952.
nnn)	WH-646	<u>Industrial Hygiene Digest</u> , March 1953.
ooo)	WH-647	<u>Industrial Hygiene Digest</u> , June 1953.
ppp)	WH-648	<u>Industrial Hygiene Digest</u> , January 1954.
qqq)	WH-649	<u>Industrial Hygiene Digest</u> , March 1954.
rrr)	WH-650	<u>Industrial Hygiene Digest</u> , August 1954.
sss)	WH-651	<u>Industrial Hygiene Digest</u> , September 1954.
ttt)	WH-652	<u>Industrial Hygiene Digest</u> , September 1955.
uuu)	WH-653	<u>Industrial Hygiene Digest</u> , October 1955.
vvv)	WH-654	<u>Industrial Hygiene Digest</u> , January 1956.
www)	WH-655	<u>Industrial Hygiene Digest</u> , February, 1956.
xxx)	WH-656	<u>Industrial Hygiene Digest</u> , July 1956.
yyy)	WH-657	<u>Industrial Hygiene Digest</u> , September 1956.
zzz)	WH-658	<u>Industrial Hygiene Digest</u> , April 1957.
aaaa)	WH-659	<u>Industrial Hygiene Digest</u> , June 1957.
bbbb)	WH-660	<u>Industrial Hygiene Digest</u> , August 1957.
cccc)	WH-661	<u>Industrial Hygiene Digest</u> , February 1958.
dddd)	WH-662	<u>Industrial Hygiene Digest</u> , July 1958.
eeee)	WH-663	<u>Industrial Hygiene Digest</u> , March 19 60.
ffff)	WH-664	<u>Industrial Hygiene Digest</u> , April 1960.
gggg)	WH-665	<u>Industrial Hygiene Digest</u> , August 1960.
hhhh)	WH-666	<u>Industrial Hygiene Digest</u> , October 1960.
iiii)	WH-667	<u>Industrial Hygiene Digest</u> , November 1960.
jjjj)	WH-668	<u>Industrial Hygiene Digest</u> , January 1961.
kkkk)	WH-669	<u>Industrial Hygiene Digest</u> , February 1961.
llll)	WH-670	<u>Industrial Hygiene Digest</u> , March 1961.
mmmm)	WH-671	<u>Industrial Hygiene Digest</u> , May 1961.
nnnn)	WH-672	<u>Industrial Hygiene Digest</u> , August 1961.
oooo)	WH-673	<u>Industrial Hygiene Digest</u> , October 1961.
pppp)	WH-674	<u>Industrial Hygiene Digest</u> , November 1961.

qqqq)	WH-675	<u>Industrial Hygiene Digest</u> , February 1962.
rrrr)	WH-676	<u>Industrial Hygiene Digest</u> , June 1962.
ssss)	WH-677	<u>Industrial Hygiene Digest</u> , August 1962.
tttt)	WH-678	<u>Industrial Hygiene Digest</u> , December 1962.
uuuu)	WH-679	<u>Industrial Hygiene Digest</u> , March 1963.
vvvv)	WH-680	<u>Industrial Hygiene Digest</u> , May 1963.
wwwv)	WH-681	<u>Industrial Hygiene Digest</u> , July 1963.
xxxx)	WH-682	<u>Industrial Hygiene Digest</u> , August 1963.
yyyy)	WH-683	<u>Industrial Hygiene Digest</u> , December 1963.
zzzz)	WH-684	<u>Industrial Hygiene Digest</u> , January 1964.
aaaaa)	WH-685	<u>Industrial Hygiene Digest</u> , April 1964.
bbbbb)	WH-686	<u>Industrial Hygiene Digest</u> , May 1964.
ccccc)	WH-687	<u>Industrial Hygiene Digest</u> , June 1964.
ddddd)	WH-688	<u>Industrial Hygiene Digest</u> , September 1964.
eeeee)	WH-689	<u>Industrial Hygiene Digest</u> , October 1964.
fffff)	WH-690	<u>Industrial Hygiene Digest</u> , January 1965.
ggggg)	WH-691	<u>Industrial Hygiene Digest</u> , April 1965.
hhhhh)	WH-692	<u>Industrial Hygiene Digest</u> , May 1965.
iiii)	WH-693	<u>Industrial Hygiene Digest</u> , July 1965.
jjjj)	WH-694	<u>Industrial Hygiene Digest</u> , November 1965.
kkkkk)	WH-695	<u>Industrial Hygiene Digest</u> , January 1966.
llll)	WH-696	<u>Industrial Hygiene Digest</u> , April 1966.
mmmmm)	WH-697	<u>Industrial Hygiene Digest</u> , May 1966.
nnnnn)	WH-698	<u>Industrial Hygiene Digest</u> , August 1966.
ooooo)	WH-699	<u>Industrial Hygiene Digest</u> , September 1966.
ppppp)	WH-700	<u>Industrial Hygiene Digest</u> , October 1966.
qqqqq)	WH-701	<u>Industrial Hygiene Digest</u> , November 1966.
rrrrr)	WH-702	<u>Industrial Hygiene Digest</u> , January 1967.
sssss)	WH-703	<u>Industrial Hygiene Digest</u> , February 1967.
ttttt)	WH-704	<u>Industrial Hygiene Digest</u> , March 1967.
uuuuu)	WH-705	<u>Industrial Hygiene Digest</u> , April 1967.
vvvvv)	WH-706	<u>Industrial Hygiene Digest</u> , May 1967.
wwwvv)	WH-707	<u>Industrial Hygiene Digest</u> , June 1967.
xxxxx)	WH-708	<u>Industrial Hygiene Digest</u> , August 1967.
yyyyy)	WH-709	<u>Industrial Hygiene Digest</u> , September 1967.
:zzzz)	WH-710	<u>Industrial Hygiene Digest</u> , October 1967.
aaaaaa)	WH-711	<u>Industrial Hygiene Digest</u> , November 1967.
bbbbbb)	WH-712	<u>Industrial Hygiene Digest</u> , December 1967.

ANSWER: See general objection and objection in response to Interrogatory No. 1.

Westinghouse further objects to this interrogatory as being unintelligible. Westinghouse cannot respond to the plaintiffs' ambiguous inquiry as to whether a document was found "in such a

condition as to create no suspicion concerning its authenticity" as these documents were not prepared by or generated by Westinghouse. Subject to the foregoing objections and without waiving same, Westinghouse responds that each of these documents appears in the condition as found in Westinghouse files. Furthermore, except for the marginalia or other extraneous information, these documents are in a condition as to create no suspicion regarding their authenticity.

INTERROGATORY NO. 4: Has Westinghouse stipulated or agreed to the authenticity of any of the documents referenced in Interrogatory No. 1 with any person prior to the date of these Interrogatories?

ANSWER: Westinghouse is not aware of any stipulation to the authenticity of any of the documents referred to in Interrogatory No. 1 except to the extent Westinghouse may have stated that the documents were provided by Westinghouse via document production in various cases.

EVNSCJH:DISCV191307.1

IN RE: ALL ASBESTOS-RELATED PERSONAL
INJURY OR DEATH CASES FILED
BY BARON & BUDD, P.C. OR TO
BE FILED BY BARON & BUDD, P.C.
IN DALLAS COUNTY, TEXAS

§ IN THE DISTRICT COURT
§
§ DALLAS COUNTY, TEXAS
§
§ 191ST JUDICIAL DISTRICT

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF ALLEGHENY)

SS:

Before me, the undersigned authority, a Notary Public in and for said Commonwealth and County, personally appeared Daniel D. Vickovic, who, being duly sworn, deposes and says that he is ASSISTANT SECRETARY OF WESTINGHOUSE ELECTRIC CORPORATION, and that he signs the foregoing DEFENDANT WESTINGHOUSE ELECTRIC CORPORATION'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S INTERROGATORIES MAILED TO DEFENDANT ON OR ABOUT SEPTEMBER 9, 1993, on behalf of that defendant and is duly authorized so to do; that the matters stated in the foregoing document are not necessarily within the personal knowledge of deponent and that deponent is informed that there is no officer of WESTINGHOUSE ELECTRIC CORPORATION who has personal knowledge of all such matters; and that the facts stated in the foregoing document have been assembled by authorized employees and counsel of defendant and deponent is informed by those authorized employees that the facts stated in the foregoing document are true and correct.

Daniel D. Vickovic
Assistant Secretary

SWORN TO and subscribed
before me on this _____ day
of _____, 1993.

Notary Public

HA:INSVCJH\DISC\191307.1

**WESTINGHOUSE ELECTRIC CORPORATION'S OBJECTIONS
AND RESPONSES TO PLAINTIFFS' INTERROGATORIES
MAILED TO DEFENDANT ON OR ABOUT SEPTEMBER 9, 1993 - Page 16**